

eHealth Ontario

# eHealth Ontario AODA Multi-Year Accessibility Plan

2013 to 2017

eHealth Ontario  
10/9/2013

***This multi-year plan has been reviewed and approved by the Chief Compliance Officer and will be sent to the Board of Directors of eHealth Ontario for approval.***

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## Our Commitment

eHealth Ontario is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We are committed to meeting the needs of people with disabilities in a timely manner.

eHealth Ontario believes in integration; we will achieve this by removing and preventing barriers to accessibility, and by meeting our accessibility requirements under Ontario's accessibility laws.

## Introduction

eHealth Ontario is a designated public sector organization that is subject to the provisions of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA); its purpose is to ensure greater accessibility for Ontarians with disabilities. Since becoming law, eHealth Ontario has been required to comply with its provisions, which are being phased in between 2010 and 2025. The AODA is Ontario's roadmap to become barrier-free by 2025. It includes accessibility standards in:

- Customer service
- Information and communications
- Employment
- Transportation
- The built environment

This Multi-Year Accessibility Plan (Accessibility Plan) outlines eHealth Ontario's compliance with the AODA; outlines current achievements with regards to accessibility; sets out eHealth Ontario's upcoming obligations pursuant to the AODA; and identifies how eHealth Ontario will meet those obligations. eHealth Ontario is committed to fulfilling our requirements under the AODA and making its premises and services accessible to all Ontarians.

## Section One: Past Achievements to Remove and Prevent Barriers

Starting January 1, 2012, all public sector organizations have been required to be compliant with the Accessibility Standards for Customer Service (Ont. Reg. 429/7). eHealth Ontario complies the requirements of this regulation. As well, it has begun initiatives to ensure compliance with some of the requirements of the Integrated Accessibility Standards Regulation (IASR) in the areas of employment, information and communication, and procurement.

In recent years, eHealth Ontario has made some notable accomplishments in accessibility, and these are listed below. An additional accomplishment was the establishment of an AODA Working Group.

## Accessibility Standards for Customer Service Regulation

### Customer Service

eHealth Ontario strives at all times to provide goods and services in a way that respects the dignity and independence of persons with disabilities. eHealth Ontario is also committed to giving people with disabilities the same opportunity to access our goods and services and allowing them to benefit from the same services, in the same place and in a similar way as other customers.

In 2011-2012, eHealth Ontario filed its customer service accessibility report, and made the following advancements in the areas of accessible customer service:

- Customer Service Accessibility Policy published online in 2009.
- Training on customer service continues to be provided to all staff, volunteers, and other third parties who provide services, and all people who are involved in the development and approvals of customer service policies, practices and procedures. eHealth Ontario will continue to ensure that new staff and staff who commence new duties that involve interaction with the public or other third parties will undertake training as part of their orientation, if they haven't already done so.
- A record of to whom and when training is delivered is monitored and confirm that training obligations continue to be met with regard to the Customer Services regulation requirements.
- We welcome feedback, and provide contact information on our website to facilitate feedback processes.
- Clients and staff have several options available to provide feedback on the accessibility of the agency's customer services, including telephone (TTY), fax, and email. A process is in place to ensure that all feedback collected is reviewed and analyzed to identify potential gaps in customer services, and to ensure appropriate actions are taken.
- eHealth Ontario will continue to provide customers with notice in the event of a planned or unexpected disruption in the facilities or services used by persons with disabilities. This notice includes information about the reason for the disruption, how long the disruption is expected to last, and a description of any alternative facilities or services available (if any).

## Integrated Accessibility Standards Regulation (IASR)

### 1. Information and Communications

eHealth Ontario will follow best practices when developing, implementing, and maintaining information and communications strategies and products to ensure that information and communications are available and accessible to people with disabilities. This includes websites, intranet sites, communication materials, telephone communications and face-to-face interactions. The goal is to achieve the most effective and efficient access to information for all users.

eHealth Ontario will be required to make its information and communications practices accessible to people with disabilities beginning in January 2014. In preparation for this timeline the following activities have been undertaken:

- A full assessment of the eHealth Ontario portal was undertaken and through a redesign full compliance with WCAG 2.0 Level A guidelines (international website accessibility standards) have been achieved. All new content or major enhancements launched after January 1, 2014 will be fully compliant as required.
- Relevant eHealth Ontario portal management and staff have received training on web accessibility.
- AODA checklist/guidelines produced for portal staff.
- Business requirements and design documentation (BRDs/FDDs) includes specific requirements for accessibility/AODA for portal
- Portlet accessibility audit is performed annually.
- An AODA awareness campaign was held with all business area Vice Presidents, and their delegates, to promote and inform on our obligations under this regulation.

## 2. Employment

eHealth Ontario is committed to inclusive and accessible employment practices that attract and retain talented employees with disabilities. eHealth Ontario is currently compliant with the 2012 requirements of the Accessible Employment Standards Regulation.

- In 2012, eHealth Ontario was required to provide individualized workplace emergency response information to employees who have a disability where necessary and upon request
- If the employee requires assistance in case of an emergency, and consented to have information about his or her accommodation needs shared, eHealth Ontario provided the workplace emergency response information to the person designated by eHealth Ontario to provide assistance to the employee.

## General Requirements

### Procurement

eHealth Ontario must consider accessibility when procuring goods and/or services. Where applicable, procurement documents should specify the desired accessibility standard to be met and provide for the evaluation of proposals in respect of those standards.

- A Procurement Accessibility policy has been included within the overall eHealth Ontario Procurement Policy (section 8.6).
- Accessibility requirements have been embedded into the procurement process.
- Regular reviews are conducted to ensure compliance and continuous improvement in procurement practices.
- Staff has been advised of the tools and resources available to help them ensure accessibility from beginning to end.

- All procurement bids submitted by potential vendors were evaluated using accessibility criteria, such as demonstrated experience, where applicable.
- A statement regarding accessibility policy has been included in contracts and RFPs where applicable.
- Created a policy to decide how to incorporate accessibility into its scoring when choosing a bidder.

## Section Two: Strategies and Actions

The strategies below summarize the eHealth Ontario plans for each of the applicable Accessibility Standards under the Accessibility for Ontarians with Disabilities Act.

Only those requirements in the General Requirements and under the IASR that apply to our organization have been included. The Accessible Transportation Standards do not apply to eHealth Ontario because we do not provide public transportation and therefore are not included.

eHealth Ontario will ensure that it continues to comply with existing accessibility requirements under both the Accessibility Standards for Customer Service Regulation and the IASR. We have also come into compliance with the General Requirements of the IASR to create an accessibility policy for the IASR, our first multi-year accessibility plan and accessibility requirements around procurement.

### Accessibility Standards for Customer Service Regulation

eHealth Ontario is committed to providing accessible customer service to people with disabilities. This means that we will provide goods and services to people with disabilities with the same high quality and timeliness as others. eHealth Ontario will continue to be in compliance with the Customer Service Standard, and will provide updates to staff with relevant information as needed.

There are no new requirements under these standards after 2012, however, in every year of this plan and beyond, eHealth Ontario will continue to ensure that it is in compliance.

Activity	Timeline
1. Continue to provide new staff and volunteers with accessible customer service training as part of onboarding	Ongoing
2. Refresh training is available for all existing employees and volunteers	Annually
3. Staff will continue to communicate with people who have disabilities in a way that take their disability into account	Ongoing
4. Review and update policies and standards regularly to ensure high quality, accessible customer service	Ongoing (e.g. annually)
5. Consult with key stakeholders and advisory groups on emerging or changing requirements	Ongoing (e.g. annually)

6. Embed accessibility requirements into staff training and orientation materials	Ongoing (e.g. annually)
7. Review customer feedback and take appropriate action	Ongoing
8. Continue to implement service disruption protocol by posting signs to advise the public where alternate service may be obtained, while repairs to existing service location are completed	Ongoing

## Integrated Accessibility Standards Regulation (IASR)

### 1. General Requirements

#### *a. Accessibility Policies and Plans*

Section 3 of the Regulation requires broader public sector organizations to develop, implement, and maintain policies on how they achieve or will achieve accessibility requirements by January 1, 2013. Section 4 of the IASR requires the creation of a multi-year plan by January 1, 2013. We are required to make our policies and plans public by posting a copy on our website and providing alternate formats on request. eHealth Ontario is compliant with the General Requirements of the IASR as an IASR policy and a procurement policy has been created, and a multi-year accessibility plan has been published.

#### *b. Training*

In 2014, Section 7 of the IASR requires that eHealth Ontario provide training to meet the accessibility standards referred to in the regulation and on the Human Rights Code. The training will target employees, volunteers and all persons who participate in developing the organization’s policies and all providers of goods, services, or facilities who act on behalf of the organizations by January 1, 2014.

Activity	Timeline
1. Training on the AODA and Ontario Human Rights Code will be delivered to all employees, volunteers and all persons who participate in developing the organization’s policies; and all other persons who provide goods, services or facilities on behalf of the organization as required, i.e. when a new staff are on boarded or there are changes to a policy	2014 and ongoing (e.g. during new employee orientation)
2. A record of training, including dates and number of trained people will be maintained	Ongoing
3. A plan for refresh training on a periodic basis for employees on an ongoing basis will be created	2014

#### *c. Procurement*

As per Section 5 of the IASR, eHealth Ontario is required to incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, whenever it is practicable to do so. When accessibility criteria are not incorporated an explanation will be provided when requested.

eHealth Ontario is committed to accessible procurement processes. We ask potential suppliers to tell us about the accessible options they offer. We include accessibility considerations in our evaluation criteria.

Activity	Timeline
1. Continue to work with contractors to ensure goods and services they may be providing are fully accessible	Ongoing
2. Vendors will continue to be asked to provide accessible options in their proposals. Accessibility considerations will continue to be part of the evaluation criteria to determine successful vendors	Ongoing

## 2. Information and Communications

eHealth Ontario is committed to making our information and communications accessible to people with disabilities.

### a. Feedback

Section 11 of the IASR requires that all organizations that have processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats or providing appropriate communications supports, upon request, by January 2014. eHealth Ontario must notify the public about the availability of accessible format and communication supports.

Activity	Timeline
1. Employees and volunteers receive specific instructions on how to handle feedback during training	Ongoing beginning January 2014
2. Alternate formats are available on request for all feedback forms	Ongoing beginning January 2014

### b. Accessible Website and Web Content

Section 14 of the IASR requires that all new internet websites or websites undergoing a major refresh, and web content (content published after January 1, 2012) on those sites must conform with the international accessibility standard known as the Web Content Accessibility Guidelines or WCAG 2.0, Level A starting January 1, 2014.

Activity	Timeline
1. All new websites and web applications starting January 1, 2014 will conform with WCAG, 2.0	January 1, 2014
2. WCAG Level A guidelines included in development of all new portlets, or changes to existing portlets.	Ongoing beginning 2014
3. New Portal redesign initiatives include accessibility compliance as part of core requirements.	Ongoing beginning 2013
4. Accessibility review performed prior to each major portlet and portal release.	Ongoing beginning 2013

5. Accessibility web testing performed on a regular basis where compliance is required	Ongoing beginning 2013
6. AODA/accessibility session held annually for ALL staff. Follow up with slide deck and revised documentation.	Annually
7. AODA checklist/guidelines reviewed and revised annually and socialized with immediate team AND project teams.	Annually beginning 2013
8. Business requirements and design documentation (BRDs/FDDs) includes specific requirements for accessibility/AODA.	Ongoing beginning 2013
9. All online training modules developed with audio and captioning. Size is scalable. Available in other formats if required.	Ongoing beginning 2013
10. Lobbying software vendors for portlets to provide more accessibility compliant toolkit.	Ongoing beginning 2013
11. Design walkthroughs and usability testing performed with potential users of new products and services.	2013
12. Design walkthroughs and usability testing performed with potential users of new products and services to include, wherever possible, a representative sample of users with disabilities.	Ongoing beginning 2014
13. New portal/portlet content produced will follow guidelines for all online documentation and communications (e.g. PDFs).	Ongoing beginning 2014
14. All project documentation includes specific requirements and techniques to be employed for achieving AODA Level A compliance.	Ongoing beginning 2014
15. Any new content, applications or sites will be built to WCAG 2.0 Level A standards. Aim to build to Level AA.	Ongoing beginning 2014
16. Any new portal technology or software upgrade(s) will ensure Level A accessibility compliance is in-built, Level AA being a nice-to-have.	Ongoing beginning 2014
17. Standard accessibility test cases will be used in unit / internal testing as well as formal QA testing.	Ongoing beginning 2014
18. Ongoing staff/customer feedback sought on product and services accessibility innovations and improvements.	Ongoing beginning 2014

### *c. Employment*

eHealth Ontario is committed to fair and accessible employment practices that attract and retain talented employees with disabilities. We will continue to ensure compliance with the 2012 requirement to provide employees with individualized emergency response plans. New employees with accommodation needs will develop individuals emergency plans with their managers. There are no new requirements under employment for 2013; however other requirements come into effect by January 1, 2014.

i. Recruitment

In compliance with Sections 23 and 24 of the IASR, eHealth Ontario will:

Activity	Timeline
1. Let job applicants know that we will accommodate disabilities during the selection process and will consult with them and make adjustments that best suit their needs.	4 <sup>th</sup> Quarter 2014
2. The eHealth Ontario Careers website will be updated to ensure accessibility. Tools, tips and resources in alternate formats will be available for candidates who are preparing for an interview with eHealth Ontario.	4th Quarter 2014
3. Notify successful applicants of your policies for accommodating employees with disabilities.	4th Quarter 2014
4. Make an effort to ensure job postings are available in a variety of forms and access points to ensure that potential applicants with accommodation needs are aware of the postings.	4th Quarter 2014

i. Informing Employees of Supports

In compliance with Section 25 of the IASR, eHealth Ontario will:

Activity	Timeline
1. Inform staff about eHealth Ontario's policies for supporting employees with disabilities.	
2. New employees receive information on supports during the orientation process.	
3. All employees will be given updated information whenever there is a change to existing policies on the provision of job accommodations.	

ii. Accessible Formats and Communication Support for Employees

In compliance with Section 26 of the IASR, eHealth Ontario will:

Activity	Timeline
1. Consult with employees who have disabilities to provide them with the accessible formats and communication supports they require to do their jobs effectively.	

iii. Individual Accommodation Plans

In compliance with Section 28 of the IASR, eHealth Ontario will:

Activity	Timeline
1. Develop written individual accommodation plans for	

employees with disabilities. Each plan will include information on accessible formats and communication supports required, individual emergency response requirements and any other accommodation needed.	
2. Maintain the privacy of the accommodation plans.	

iv. Return to Work

In compliance with Section 29 of the IASR, eHealth Ontario will:

Activity	Timeline
1. Outline the steps that will be taken to help employees return to work when they have been absent because of a disability or need some form of accommodation to return to work.	

v. Performance Management and Career Development

In compliance with Sections 30 and 31, eHealth Ontario will:

Activity	Timeline
1. Make performance management accessible by ensuring accommodation plans are reviewed for adjustments to help employees succeed, provide accessible feedback.	2014
2. Update existing performance management process to ensure that accessibility is built into the process.	2014
3. Develop list of considerations concerning accessibility that each manager will include in performance management and career development	2014

*d. Accessible Formats and Communication Supports*

In 2015, eHealth Ontario is required to be compliant with Section 12 of the IASR, meaning that, upon request, we must provide or arrange for information in accessible formats and/or will provide communication supports for people with disabilities. eHealth Ontario will ensure that the information will be provided in a timely manner, at no extra cost, and will consult with the person making the request to determine the most appropriate format or support.

Starting in 2014, eHealth Ontario will begin planning and implementing the activities necessary to ensure compliance to the requirements of Section 12.

**Design of Public Spaces**

Beginning in 2016, eHealth Ontario will be required to maintain the access parts of our public spaces in accordance with the Accessibility Standard for the Design of Public Spaces. eHealth Ontario will put procedures in place to prevent service disruptions to the accessible parts of our public spaces.

Initiative	Timeline
1. Procedures will be established for handling temporary disruptions in service when an accessible part of our public spaces stops working, such as putting up a sign explaining the disruption and outlining an alternative. Formal procedures will be established and communicated to the Facilities team. <sup>1</sup>	February 2014
2. Preventative and emergency maintenance procedures will be established for the accessible parts of our public spaces, such as posting when regular maintenance occurs and letting people know about alternatives. Formal procedures will be established and communicated to the Facilities team. <sup>2</sup> (Informal procedures are currently followed by posting signs where access is limited or unavailable)	February 2014.

## For More Information

For more information on this accessibility plan, please contact

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Standard and accessible formats of this document are free on request from

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<sup>1</sup> Informal procedures are currently followed by posting signs where access is limited or unavailable.

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