



AODA Compliance

Interactive guide

Introduction

The Accessibility for Ontarians with Disabilities Act (AODA) was enacted in 2005, and is based on the 2001 Ontarians with Disabilities Act. It establishes standards that both public and private organizations must follow to ensure greater access for Ontarians living with a disability. The goal is to create a barrier-free Ontario by 2025.

The AODA is broad in scope, establishing accessibility standards for information and communications, employment, transportation, the design of public spaces, and customer service.

In this guide, we will focus on accessible websites and web content, which are included in the information and communications standards. To comply with this section of the AODA, all internet websites and web content must be accessible for individuals with disabilities. This includes any information found on a web page or web application, such as text, images, forms, and sounds.

So where do you begin when it comes to AODA compliance, and how do you know if your website and web content meet accessibility standards? Our interactive guide, with an accompanying checklist, will help get you started.

Requirements and penalties

By January 1, 2021, the AODA required that all public-sector organizations of any size and private organizations with 50 or more employees ensure their public-facing web content conforms with the Web Content Accessibility Guidelines (WCAG) 2.0 AA standards, except for:

- Success Criterion 1.2.4 (live captions)
- Success Criterion 1.2.5 (pre-recorded audio descriptions)

WCAG was developed by the Web Accessibility Initiative of the World Wide Web Consortium (W3C), and is a set of technical success criteria that, when followed, improve the accessibility of websites and web content. WCAG success criteria are categorized into three levels: A, AA, and AAA, with A representing the base level of conformance and AAA the maximum. Each level builds on the previous level like a pyramid. So, in order to meet Level AA, you must meet all of Level A, and in order to meet Level AAA, you must meet all of Level AA. There are also various versions of WCAG: 1.0, 2.0, 2.1, and 2.2. Each version builds upon the previous, adding additional success criteria to keep pace with changing technology and user needs.

To demonstrate WCAG conformance, all businesses and nonprofits with 20 or more employees are required to file an accessibility compliance report with the Government of Ontario, confirming compliance with AODA requirements. The first deadline was June 30, 2021, and the most recent deadline was December 31, 2023. Public-sector organizations must complete this report every two years. Private-sector organizations with 20 to 49 workers, or 50 or more workers, must complete accessibility compliance reports every three years.

Failure to comply with the AODA can result in significant financial penalties. In the most severe cases:

- A corporation / organization can be fined up to \$100,000 per day.
- Directors and officers of a corporation / organization can be fined up to \$50,000 per day.

Who must comply with the AODA?

Organizations are required to make their websites and web content conform with WCAG 2.0 AA standards if they are:

- A public-sector organization (government, municipalities, educational institutions).
- A private organization with 50+ employees (business, nonprofit, private education).

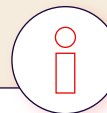
It's worth noting that smaller private-sector organizations must also meet AODA requirements; however, the law's web accessibility provisions apply specifically to those with 50 or more employees.



Testing against WCAG

While WCAG itself is not a piece of legislation, it is widely considered the international benchmark for web accessibility and is adopted in numerous accessibility laws. When a website or web content conforms with WCAG 2.0 AA standards (which include the Level A standards), it is compliant with the web accessibility requirements in the AODA.

To gauge WCAG conformance, first conduct an evaluation of your website or web content. This evaluation can consist of the step-by-step process of thoroughly and diligently testing whether that experience is usable by people with disabilities.



While conformance with WCAG 2.0 is the stated AODA requirement, the W3C has released more recent versions of the standards: WCAG 2.1 and WCAG 2.2. These versions build upon WCAG 2.0 with additional success criteria that improve usability on mobile phones and tablets, as well as focus on specific enhancements for users with low vision, cognitive and learning disabilities, and motor disabilities. Although not technically required for AODA compliance, as the best practice, the W3C recommends conformance with the latest version of WCAG. It will not only provide improved accessibility for every user, it will also ensure your organization is up to date in its compliance efforts as we anticipate future policy changes and updated legal rulemaking. To learn more about conformance with the most recent version of WCAG, access our [Must-Have WCAG Checklist](#).

A comprehensive WCAG accessibility evaluation typically involves a combination of automated testing and extensive manual evaluation.

Automated testing

Automated testing (or scanning) is a great first step in the testing process. Organizations will differ in how they incorporate automated testing into their workflows. Two common approaches to automated accessibility testing are ad-hoc and integrated.

Option 1: Ad-hoc approach

In an ad-hoc approach, specific teams connected to the web, software, or product development life cycle will usually choose tools that support their work and integrate automated testing in their own workflows, perhaps sharing data and results with other teams, perhaps not. If choosing this approach, we recommend you determine which tools will work with your firewall settings, as well as for your design and developer teams. Quality assurance (QA) teams will likely need to leverage even more tools to ensure compliance and usability. Consider the following list of common automated testing tools as you get started.

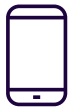




Design accessibility

A color contrast checker, like the [Level Access Accessible Color Picker](#) for Chrome, is an online tool that enables users to select or enter the hex codes of foreground and background color to reveal the contrast ratio between the two, ensuring you meet WCAG requirements. If the two colors do not have a high enough contrast, these tools will offer suggestions or allow you to adjust either color until the proper contrast is met, providing the new hex code. The [WebAIM Contrast Checker](#) is another popular tool in this category.

Additionally, designers may want to explore [freely available accessibility design kits](#) by leading brands and thought leaders in Figma, along with licensable tools such as the [Level Access Figma plugin](#).



Mobile accessibility

Two tools serve the mobile accessibility space. [Accessibility Scanner](#) checks the accessibility of Android apps. For iOS, [Accessibility Inspector](#) can be used. Both apps are utilized by development and QA teams.



Document accessibility

The Document Accessibility Toolbar is a dedicated accessibility ribbon menu for Microsoft Word that makes it quicker and easier to create accessible documents. This toolbar features a range of hand-picked and custom-built functions to optimize and validate a document for accessibility.

For Windows users, the [PDF Accessibility Checker \(PAC 2021\)](#) tool checks PDFs for accessibility. Mac users may want to explore the Accessibility Checker capabilities in Adobe Acrobat Professional.

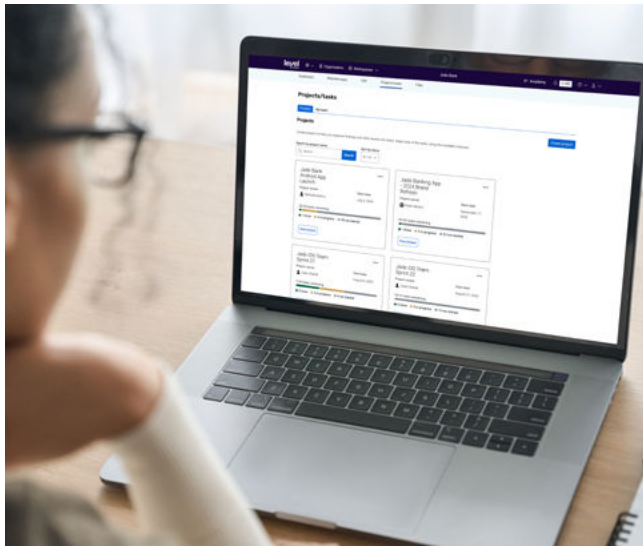


Web accessibility

For a quick, at-a-glance survey of a website's accessibility, teams can start with a free page scanner, like the [one we offer at Level Access](#).

For a more in-depth scan, the [WAVE](#) tool by WebAIM scans a URL, delivering a report that uses a simple red, yellow, or green icon to show errors, warnings, and elements that pass.

There are also some tools that help teams embed automated testing for accessibility in their development workflows, such as our [free automatic and continuous testing tools](#).



Option 2: Integrated approach (recommended)

While free tools like the ones we've listed can help you get an initial overview of your digital experiences' accessibility, when it comes to maintaining sustainable digital accessibility compliance, managing and applying results from multiple different testing tools, being used by multiple teams, quickly becomes unmanageable. An integrated accessibility management platform offered by an expert third-party provider helps to organize and streamline testing data and remediation work. Seek a solution that offers specific tools for different creative roles, such as designer and developer suites, and integrates with existing project management tools, such as Jira. A truly sustainable solution will also offer robust monitoring insights and dedicated dashboards to track progress made and efficiency gained over time.

Manual and functional testing

Manual and functional testing will build upon automated testing results. In this process, accessibility experts, which should include people with disabilities, check website features and key user flows using assistive technology. This evaluation will confirm or dismiss any issues reported in an automated scan, as well as identify any new issues that should be resolved.



There are several ways to accomplish manual testing:

Option 1

Build an in-house team of accessibility testers to perform QA on digital assets in development.

Option 2

Hire an outside consultant to provide a one-time report outlining issues identified and barriers encountered.

Option 3

Work with an accessibility partner on an ongoing basis. A partner should provide automated testing as well as give you access to an expert team to manually check digital assets using assistive technology. These partners will also work with you to develop prioritization reports outlining the critical, high, medium, and low-level issues; monitor your digital properties on an ongoing basis; validate fixes; and integrate seamlessly into your backend systems for better team collaboration.

WCAG 2.0 A and AA checklist

As you create or review your content, or partner with a company to conduct accessibility testing, the following checklist will serve as a helpful guide for meeting the WCAG 2.0 success criteria required for AODA compliance.

Level A checklist

Success criterion	Description	Pass/Fail	Complete
<u>1.1.1 – Non-text Content</u>	Text alternatives are provided for non-text content.	☐ ☐	☐
<u>1.2.1 – Audio-only and Video-only (Pre-recorded)</u>	A transcript is provided for audio-only content and a transcript or audio description is provided for video-only content.	☐ ☐	☐
<u>1.2.2 – Captions (Pre-recorded)</u>	Captions are provided for video with audio.	☐ ☐	☐
<u>1.2.3 – Audio Description or Media Alternative (Pre-recorded)</u>	A transcript and / or audio descriptions are provided for video with audio.	☐ ☐	☐
<u>1.3.1 – Info and Relationships</u>	Information and content relationships implied by formatting are communicated in text or in a way that works with assistive technology.	☐ ☐	☐
<u>1.3.2 – Meaningful Sequence</u>	The reading order of content is meaningful, no matter how a user accesses or consumes it.	☐ ☐	☐
<u>1.3.3 – Sensory Characteristics</u>	Instructions rely on more than one sense.	☐ ☐	☐
<u>1.4.1 – Use of Color</u>	Color is not the only way used to distinguish an element, convey meaning, indicate an action, or prompt a response.	☐ ☐	☐

Level A checklist *(continued)*

Success criterion	Description	Pass/Fail	Complete
<u>1.4.2 – Audio Control</u>	A mechanism is provided to control audio that plays on page automatically for more than three seconds.	☐ ☐	☐
<u>2.1.1 – Keyboard</u>	All functionality is operable using a keyboard (with exceptions).	☐ ☐	☐
<u>2.1.2 – No Keyboard Trap</u>	The focus does not get trapped on any element in keyboard-only navigation.	☐ ☐	☐
<u>2.2.1 – Timing Adjustable</u>	If a page has a time limit, users can turn the time limit off, adjust it, or extend it.	☐ ☐	☐
<u>2.2.2 – Pause, Stop, Hide</u>	User controls are provided for moving or dynamically changing content.	☐ ☐	☐
<u>2.3.1 – Three Flashes or Below</u>	No content flashes more than three times per second, or the flash is below flash thresholds.	☐ ☐	☐
<u>2.4.1 – Bypass Blocks</u>	When blocks of content are repeated on multiple pages, a mechanism is provided to bypass / skip them.	☐ ☐	☐
<u>2.4.2 – Page Titled</u>	Page titles clearly describe the page topic or page purpose.	☐ ☐	☐
<u>2.4.3 – Focus Order</u>	The tabbing order of the content is meaningful and supports operation.	☐ ☐	☐
<u>2.4.4 – Link Purpose (In Context)</u>	The purpose of each link can be determined from the link text alone or from the link text and its related context.	☐ ☐	☐
<u>3.1.1 – Language of Page</u>	Each page has a human language assigned.	☐ ☐	☐
<u>3.2.1 – On Focus</u>	Interactive elements receiving focus do not trigger any functionality.	☐ ☐	☐
<u>3.2.2 – On Input</u>	Interactive elements receiving input do not trigger any functionality.	☐ ☐	☐

Level A checklist *(continued)*

Success criterion	Description	Pass/Fail	Complete
<u>3.3.1 – Error Identification</u>	When input error is detected, the user is notified and the error is described.	☐ ☐	☐
<u>3.3.2 – Labels or Instructions</u>	A persistent visible label and / or instructions are provided for elements that require user input.	☐ ☐	☐
4.1.1 – Parsing	HTML code is clean and well formed in a way that it can be interpreted by browsers and assistive technology. *Note: Criterion 4.1.1 – Parsing, has been removed in WCAG version 2.2 and is now considered automatically met for versions 2.1 and 2.0.		
<u>4.1.2 – Name, Role, Value</u>	All user interface components communicate their accessibility properties and actions to assistive technology.	☐ ☐	☐

Level AA checklist

Success criterion	Description	Pass/Fail	Complete
<u>1.4.3 – Contrast (Minimum)</u>	The contrast ratio between regular-sized, non-decorative text and its background is at least 4.5:1.	☐ ☐	☐
<u>1.4.4 – Resize Text</u>	Text can be resized up to 200% without loss of content or function.	☐ ☐	☐
<u>1.4.5 – Images of Text</u>	Aside from a few specific exceptions, there are no images of text.	☐ ☐	☐
<u>2.4.5 – Multiple Ways</u>	There is more than one way to reach each page.	☐ ☐	☐
<u>2.4.6 – Headings and Labels</u>	Headings and labels are clear and descriptive.	☐ ☐	☐
<u>2.4.7 – Focus Visible</u>	Keyboard focus is clear and visible.	☐ ☐	☐
<u>3.1.2 – Language of Parts</u>	Assistive technology can distinguish and reflect when the human language on a page changes.	☐ ☐	☐
<u>3.2.3 – Consistent Navigation</u>	Navigational elements are consistently displayed, including their location and the order of their content.	☐ ☐	☐
<u>3.2.4 – Consistent Identification</u>	Components with the same functionality are consistently identified.	☐ ☐	☐
<u>3.3.3 – Error Suggestion</u>	Users receive helpful / specific suggestions when they make errors.	☐ ☐	☐
<u>3.3.4 – Error Prevention (Legal, Financial, Data)</u>	When users enter financial or legal data, submissions are reversible, and data is checked and confirmed before submission is finalized.	☐ ☐	☐

Your AODA compliance solution

Whether you want help evaluating the state of accessibility for your website or web content, or you're ready to make them accessible, Level Access is here to help. Our team of experts will work with you on a continual basis, equipping you with the tools, technology, training, and legal support needed to make your website and web content compliant, and keep them that way. We'll also help you create and submit an Accessibility Compliance Report satisfying the AODA requirement, publish a public-facing accessibility statement, and implement an enterprise-wide accessibility policy to maintain compliance with the AODA, ADA, Section 508, and other global requirements.

To learn more about the Level Access solution, or to [request a demo](#), visit LevelAccess.com

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