



FACILITATION OF THIRD PARTY ACCESSIBILITY CERTIFICATION CONSULTATION

Final Report

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I. Executive summary

Accessibility refers, at its most general, to the relationship between a person's needs and goals and the environment or system. A voluntary accessibility certification model could be a valuable tool in working towards [a more inclusive, accessible Ontario](#). Certification would publicly recognize organizations that display excellence in accessibility, complementary to the framework prescribed by the [Accessibility for Ontarians with Disabilities Act \(AODA\)](#), in accordance with [Ontario's Human Rights Code \(the Code\)](#).

To this end, the [Accessibility Directorate of Ontario](#) (the Directorate) engaged Deloitte to facilitate a three-phase public consultation process to explore the merits, viability and design of a third party accessibility certification model. This process followed the ["open dialogue" methodology](#), where participants not only advance their own views on a topic, but go on to engage one another in the search for common ground (see Appendix E for more information on open dialogue and public engagement).

Project approach

The three-phase consultation process engaged over 400 members of the accessibility advocacy, business, not-for-profit, academic, and broader public sector in person and online to discuss the viability, risks, development and design of an accessibility certification model.

Phase 1

- Over 200 participants explored the interest in certification as an approach, including its challenges, opportunities, and viability
- While some voiced serious concerns that certification would undermine existing accessibility initiatives in Ontario, the majority felt the idea was worth pursuing

Phase 2

- 60 working group members and approximately 20 online respondents further explored five functional components of a certification for business: model scope and design, incentives for business, governance and leadership, self-sustainability, and branding and marketing
- Phase 2 participants created a set of guiding principles and recommendations that collectively provide a framework for a viable certification model

Phase 3

- 7 organizations submitted certification model prototypes demonstrating how they might realize the Phase 2 principles and recommendations

Results

According to the working group principles, a viable certification model would be:

- Hybrid, creating a feedback loop between community feedback and user

- experience with organizational capacity
- Collaborative, involving input from multiple communities and areas of expertise, including lived experience
- Inclusive, applying across standards and sectors (e.g., not only built environment or communications)
- Multi-functional, with education, assessment, accreditation and recognition services based on inclusive design best practices

The leader of a certification model would:

- Ensure that certification augments and reinforces vs. undermines or duplicates legislation
- Define key phrases, including accessibility, certification
- Balance the fluid and community driven nature of a hybrid model with the rigour and reliability required for business
- Pilot in a community or champion sector

The 7 prototypes created in Phase 3 illustrated how these principles might be actioned. The public particularly favoured prototypes that were:

- Simple, understandable, easy to use, and low cost for businesses, organizations, and other members of the community
- “Hybrid”, relying on lived experience and professional assessment to evaluate and recognize businesses’ performance in serving the needs of the community
- Collaborative and representative in design, delivery, and leadership, with ties to the community and various coordinating bodies and inclusive of all abilities and categories of accessibility

Lessons learned

As with any open-ended and iterative process, there were lessons learned that might be applied in future consultations.

- The relatively short consultation timeframe created a barrier to participation and careful deliberation for some
- The open, iterative co-design process, while productive, sometimes limited the ability to have a clear line of sight on next steps
- The initiative struggled to broaden its audience beyond those already engaged in or aware of the accessibility space

Opportunities for development and next steps

According to public feedback, organizations interested in developing a more detailed proposal for their accessibility certification model should consider the following:

- Their capacity to develop and deliver a sustainable certification program that is comprehensive and transformative for the culture surrounding accessibility
- A model that appeals and adapts to businesses, organizations, and communities of different sizes and types
- A model that is transportable, promoting the cultural shift beyond geographic

boundaries

In order to deliver a program of this breadth and impact, potential lead organizations will need to collaborate and partner with individuals with lived experience, certification and accessibility experts, and community agents. Raising the bar on accessibility in Ontario will require the knowledge, efforts, skills, and good will of all Ontarians.

II. Background and context

An opportunity exists to further advance the value of accessibility in Ontario by 2025 and beyond. While the passage of the [AODA](#) in 2005 made Ontario the first province to move to a modern regulatory regime mandating proactive accessibility standards, the legislation does not always capture the performance of accessibility, as measured by daily individual and community experiences of inclusivity.

In the interest of using a variety of tools to advance accessibility in Ontario:

- The [Directorate](#) engaged Deloitte to facilitate an open, multi-stakeholder public consultation to explore the creation and viability of a third party accessibility certification program
- The consultation included persons of all abilities, including accessibility advocates, businesses, certification experts, non-profit organizations, and members of the broader public sector

Research and literature review

A literature review and series of research consultations was conducted over summer 2015 to gauge the level of interest and viability in certification as an approach to accessibility. The response indicated an interest in further exploring the initiative. For more information, please see Appendix F.

The research identified four potential outcomes from accessibility certification:

- Reduce attitudinal barriers and promote the value of accessibility
- Lead organizations to a better understanding of what they can do to increase their accessibility and how accessibility can benefit their organization
- Give a wider range of people improved access to goods and services
- Support a gradual cultural shift toward embracing the business case for accessibility, making accessibility part of daily life

The research found six key success factors for certification models:

1. Engage multiple stakeholders throughout the certification development process.
2. Develop a clear understanding of the underlying issue(s) and objective(s) of the certification program.
3. Develop standards that are balanced, flexible and directly aligned with the underlying goals of the program.

4. Use a trusted, third-party certifier to provide credible, independent and objective assurances that program objectives are being achieved.
5. Use logos and other incentives to promote interest and uptake in a certification program.
6. Use of a pilot program and well-defined monitoring and evaluation procedures to ensure long-term relevance and success

III. Project approach and methodology

Public consultation and engagement

This process was used as a [Public Engagement](#) demonstration project, part of [Ontario's Open Government Initiative](#). The intent was to maintain a transparent, open-ended, and rigorous process, seeking the broadest possible input on the merit of a certification model.

As such, the process relied on constant engagement with individuals of all abilities. Every phase relied on a feedback loop between in person discussions and social media and online response via [certifiedforaccess.ca](#). For more information on open dialogue, see Appendix E.

The consultation process

The consultation process was iterative in its structure and implementation throughout the project, remaining flexible in response to community needs and discussion.

Phase 1 (November – January 2016)

Phase 1 had two objectives:

1. To explore the level of interest in an accessibility certification model
2. To engage in a balanced discussion of its challenges, opportunities, and viability as an approach.

Through roundtable sessions, online feedback, and one on one discussions with over 200 participants, Phase 1 identified barriers, challenges and opportunities surrounding accessibility in Ontario. For more information on Phase 1 findings, see Appendix A.

Phase 2 (February – March 2016)

Phase 2 discussions had two objectives:

1. To provide recommendations on how components related to the assigned focus area might be realized in an accessibility certification model
2. To identify key considerations and risks associated with the assigned focus area

Over 80 individuals provided input across five working groups, three one-on-one interviews, and through online feedback. Working group members developed principles

and recommendations for a viable certification model. For more information on Phase 2 findings, see Appendix B and Appendix C.

Phase 3 (March – May 2016)

Phase 3 had three objectives:

1. To illustrate how the working group recommendations might be actualized
2. To outline the capacity required to develop and lead a sustainable model
3. To gauge community reaction, needs and preferences with regards to an accessibility certification model

Based on the working group recommendations, seven organizations prepared model prototypes illustrating how they would design and deliver the accessibility certification model. Approximately 300 respondents commented on the different prototypes. For an overview of the prototypes and the feedback received, see Appendix D.

IV. Key themes and results

Accessibility certification prototypes

Seven prototypes were submitted in Phase 3 to illustrate how the working group guiding principles could be actioned. Public feedback on the prototypes was gathered via social media and on certifiedforaccess.ca and is summarized below.

1. Accessibility Certification Model, proposed by AccessAbility Advantage (A+), a joint venture of March of Dimes Canada and Quadrangle Architects
 - **Description:** An accreditation program, recognizing excellence in the five AODA categories according to best practices standards and SME verification
 - **Feedback:** Clear and flexible with good use of recognized standards; more detail needed on evaluation and involvement of persons with lived experience
2. Accessibility & Inclusion Index, proposed by Canadian Business SenseAbility (CBSA)
 - **Description:** An expansion of the Canadian Business SenseAbility disAbility Inclusion Index (DII), building in expert verification and awards
 - **Feedback:** Inclusive with good use of a tested tool; concerns included scale-ability, affordability, and singular organizational focus on business
3. Business Innovation Guide for Inclusive Design and Accessibility (BIG IDeA), proposed by the Inclusive Design Research Centre
 - **Description:** A consortium-led platform supporting accessibility improvement based on a virtuous cycle of customer reviews and verification by experts
 - **Feedback:** Innovative, transparent design with equal consideration for

users, businesses, and community; some found it complex and vague on cost

4. Certified4Access, proposed by Get Inclusive
 - **Description:** A program for accessibility training, assessment, and certification, based around a public-facing website for administration and information
 - **Feedback:** Clear four-part focus and a centralized website with good existing standing in the community; more detail needed on accreditation and standards
5. Certified for Access, proposed by T4G
 - **Description:** The digital accessibility leader for a partnership-led tiered recognition and learning-based certification program
 - **Feedback:** Simple and portable with good tiered approach and focus on collaboration; more details needed on adaptability to small communities
6. RHF Certification Program, proposed by the Rick Hansen Foundation
 - **Description:** A national certification and accreditation program focused on the built environment
 - **Feedback:** Comprehensive, with defined timelines and strong organizational capacity; limited focus on built environment
7. Training Academy Awareness Program, proposed by Marisol Pestana
 - **Description:** A training academy focused on the travel and tourism industry, with recognition for completed seminars and modules
 - **Feedback:** Sound approach to education and awareness for a range of types of disabilities; limited sectoral scope and vague on cost and implementation

For a more detailed overview of the accessibility certification prototypes and the feedback received, please see Appendix D.

Prototype alignment with the guiding principles

The working group guiding principles offer a useful rubric to:

1. Evaluate how closely the prototypes align with public sentiment
2. Reasonably assess the level of responsiveness a similar certification model might encounter in the community

The following details how the public thought the prototypes compared to the working group principles, grouped by theme.

At a broad level, all the prototypes aim to increase awareness, recognize success and support improvement. **Respondents favoured prototypes with the following attributes:**

- Clear, simple, and user-friendly
- Delineating levels of certification
- A simple evaluation and report back process
- A single storefront for business achievements, information and resources
- Incorporated all types of accommodation and types and size of business

Respondents thought the prototypes could be improved by:

- Providing more detail on adaptability to different sizes of business and rural vs. urban communities
- Leveraging partners, collaborators or community partners to increase scope and representativeness

Each prototype addresses some but not all of the guiding principles. Through collaboration and partnership, however, there is an opportunity to create a certification model that might demonstrate the principles in their totality.

Model design principles

While all the prototypes presented hybrid models, some relied more heavily on evaluation by accredited experts (e.g., models by the Rick Hansen Foundation and AccessAbility Advantage) while some based evaluation on user feedback, with professional evaluators used for verification (e.g., the BIG IDeA platform).

Respondents favoured prototypes that:

- Took a hybrid approach, with some variation on evaluation and report back by accredited professionals, with standards for evaluation, results, and improvement validated by user feedback, creating a continuous feedback loop
- Used a tiered approach, with clear criteria set for each successive level of recognition
- Measured progress towards criteria with an index
- Provided clear, simple branding for each level (e.g., bronze, silver, gold, platinum)
- Established transparent standards, tools, evaluation, and internal review processes

Respondents thought the prototypes could be improved by:

- Further clarifying how standards would be established and reinforced, while remaining fluid and responsive to user, business and organizational feedback
- Details on portability beyond Ontario

Community participation principles

Much of the response to the prototypes emphasized the importance of community participation. **Respondents favoured prototypes that:**

- Engaged with the lived experience of persons of all abilities, in the design, implementation, operations, and ongoing review of the program
- Included opportunities for collaboration with existing organizations or initiatives in

the accessibility sphere

Respondents thought the prototypes could be improved by:

- Increasing representation of a range of communities and persons of all abilities
- Further details on how the model might apply to rural communities

Respondents were divided:

- While some respondents liked Canadian Business SenseAbility's focus on the benefits of accessibility for business, others preferred a focus on accessibility as the "right thing to do"
- Models with multi-step evaluation processes and associated costs may have appealing rigour but may be too complex and costly for business
- Highlighting inclusive design (e.g., the BIG IDeA platform) might offer a third way, promoting innovation while aligning with existing business plans for growth

Legal principles

No prototype contradicted the legal principles, though some tied their criteria more explicitly to AODA, the Ontario Human Rights Code, and other existing standards (e.g., AccessAbility Advantage's model). **Respondents favoured prototypes that:**

- Offered a measure of rigour through evaluation or verification by accredited professionals

Respondents thought the prototypes could be improved by:

- Specifying how the certification leader would design and deliver services in both official languages (e.g., collaboration with a defined partner)

Respondents were divided:

- Too much basis in legislation might limit the scope of certification, missing aspects of accessibility not covered by the five standards
- Tying certification too closely to legislation might confuse the public or result in a non-compliant organization being recognized

Leadership principles

The public felt strongly that the leadership model should be collaborative. This might include partnerships with coordinating bodies, including chambers of commerce and professional associations, or between businesses (e.g., the Training Academy Awareness Program would partner with travel and tourism boards). **Respondents favoured prototypes that:**

- Had organizational capacity, including the ability to sustain partnerships, brand recognition and strong ties to the community
- Grew from existing or already piloted programs

Respondents thought the prototypes could be improved by:

- Providing more details on how and with whom leadership would collaborate (e.g.,

respondents liked that the Rick Hansen Foundation model defined its partners)

Respondents were divided:

- An organization with a strong existing focus may have too many competing priorities or a bias in terms of scope (e.g., a current focus on employment or built environment may limit attention to digital accessibility)

Prototype strengths

Taking the principles together, **respondents favoured prototypes that were:**

- Simple, understandable, easy to use, and low cost for businesses, organizations, and other members of the community
- “Hybrid”, relying on lived experience and professional assessment to evaluate and recognize businesses’ performance in serving the needs of the community
- Collaborative and representative in design, delivery, and leadership, with ties to the community and various coordinating bodies and inclusive of all abilities and categories of accessibility

Please note that this does not undermine the importance of other principles or recommendations. It does offer guidance as to where there is most consensus around the components of a certification model.

Future considerations for prototype authors

Respondents thought the prototypes could be improved along three dimensions:

- Capacity of the organization to develop and deliver an accessibility certification model
- Comprehensiveness or inclusivity of the proposed model and its ability to adapt to businesses, organizations, and communities of different sizes and types
- Collaboration and partnership in the design and delivery of the program

These considerations speak to the fact that no one model or model leader will fulfill all the principles. These areas for improvement are a chance to identify interdependencies and opportunities for collaboration with other organizations that possess complementary skills. Table 1 outlines which dimensions respondents thought were areas of strength for each prototype, coded as yes, with areas of improvement coded as “could improve”.

Table 1 - Strengths and Areas for Improvement for the Model Prototypes

Prototype (Name and Organization)	Organizational capacity to develop and deliver the model	Model comprehensiveness, inclusivity, and adaptability	Collaboration and partnership in design and delivery
Accessibility Certification Model, proposed by AccessAbility Advantage (A+), a joint venture of March of Dimes Canada and Quadrangle Architects	Yes	Yes	Could improve
Accessibility & Inclusion Index, proposed by Canadian Business SenseAbility (CBSA)	Yes	Could improve	Could improve
Business Innovation Guide for Inclusive Design and Accessibility (BIG IDeA), proposed by the Inclusive Design Research Centre	Yes	Could improve	Yes
Certified4Access, proposed by Get Inclusive	Yes	Could improve	Yes
Certified for Access, proposed by T4G	Yes	Could improve	Yes
RHF Certification Program, proposed by the Rick Hansen Foundation	Yes	Could improve	Yes
Training Academy Awareness Program, proposed by Marisol Pestana	Could improve	Could improve	Yes

Capacity to develop and deliver an accessibility certification model

As shown above, respondents thought that some prototype authors had more organizational capacity to lead a certification model than others. Many, however, noted that no one organization would have all the strengths required for full development and delivery: pre-existing partnerships, the resources to ensure program sustainability, and

representative and diverse ties to community. **Considerations for a potential leader might include:**

- How connected are they to “front line” professionals currently delivering accessibility-related programs or individuals active in the community?
- Do they need a partner with established networks in the business community (e.g., a Board of Trade)?
- If well situated for business, are they in need of a partner with credibility in and awareness of the accessibility space (e.g., a not-for-profit)?
- What functions are they able to deliver? If they have a wealth of resources and a digital platform, do they need a partner to accredit professional evaluators?

Comprehensiveness, inclusivity and adaptability

Many respondents commented that certification will have difficulty gaining buy-in or momentum if it is not low-cost and feasible for small businesses and applicable to both rural communities and urban centres. **Considerations for a potential leader might include:**

- How will the certification program adapt to different sizes and types of businesses and communities?
- How can they leverage the wealth of user feedback on community-, business-, or user-specific needs?

Collaboration and partnership

Respondents emphasized that the potential certification leaders needed to collaborate and establish partnerships, both with individuals with lived experience of barriers to accessibility and with organizations with different areas of expertise. **Considerations for a potential leader might include:**

- Partnering with other organizations with complementary expertise (e.g., the T4G prototype is positioned themselves as the “digital accessibility” piece of the puzzle)
- Approaching each community or set of businesses with adaptability and responsiveness
- Incorporating the knowledge of persons with lived experience of barriers to accessibility in the design of standards and delivery of certification programs. Users can best assess a business’s daily execution and performance of accessibility
- The broad range of arrangements that might be implied by partnership and collaboration, with differing levels of commitment, complexity, and legal implications

V. Lessons learned

Based on feedback from stakeholders, three key lessons can be gleaned from this consultation and applied to future initiatives, with the hope of ensuring the most rigorous and inclusive process possible.

1. This consultation occurred during a relatively short timeframe of five months. As such, participants were often required to be available or to provide response on short notice and with quick turnaround. Some saw this as positive, ensuring the initiative maintained momentum and realized results efficiently. That said, many felt the timeframes created a barrier to participation, restricting opportunities for thoughtful deliberation and co-design. Organizers of similar consultation processes should carefully consider timelines for public discussion, review, and input.
2. This project involved a range of stakeholders and communities with diverse and sometimes conflicting views. While a willingness to follow the popular direction is a strength, it can also result in a scattered outcome with little clarity on what comes next. Future consultations might continue to fine tune the balance between allowing an open and iterative process and setting defined, actionable next steps.
3. This initiative struggled throughout to broaden its audience beyond those already engaged in or aware of the accessibility space. As public validation is critical for a project created by and for the broader community, this was a major barrier. Future consultations should continue to seek successful channels, including social media, coordinating bodies in the community, and targeted outreach, to make giving input simple, intuitive, and relevant to a diversity of people.

VI. Conclusion and next steps

This consultation process aimed to complement and highlight the wealth of past and present initiatives around accessibility in the business, academic, and broader public sector communities. That said, participants grappled with how this process and the eventual accessibility certification might add value rather than duplicate or undermine existing efforts.

What we heard from participants is that the process has added value by creating a space for a wide range of actors to enter into dialogue, identify interdependencies, and look at how they might collaborate rather than duplicate efforts in the short-, medium- and long-term. It has also prioritized the lived experience of persons of all abilities as a valuable input in the co-design process. This has allowed the community to identify new points for cooperation and understanding.

The accessibility certification itself bridges a gap between past and present initiatives and their target organizations. We heard from businesses that while they support accessibility, they see the network of existing resources as overwhelming and complex.

Embracing accessibility seems time consuming and costly. Many organizations barely meet the technical legal requirements without consideration for the actual performance of inclusivity. Accessibility certification will not replace, undermine, or duplicate legal enforcement of mandatory requirements. Rather, it will connect organizations aspiring to inclusivity with the resources to do so.

After the current consultation process concludes, interested organizations will be asked to develop more detailed proposals, of sufficient rigour to begin establishing partnerships, securing funding, and further articulating program objectives and structure. The hope is that the public consultation process has laid the foundation for innovation and championship in accessibility in Ontario and beyond.

VII. Appendices

Appendix A – Overview of Phase 1 discussion themes

Appendix B – Overview of Phase 2 guiding principles

Appendix C – Overview of Phase 2 points of deliberation

Appendix D – Overview of Phase 3 model prototypes and public response

Appendix E – Open dialogue and public engagement

Appendix F – Summary of findings from the research and literature review

Appendix G – Definition of key terms

Appendix H – References

Appendix A – Overview of Phase 1 discussion themes

Through roundtable sessions, online feedback, and one on one discussions, over 200 Phase 1 participants identified barriers, challenges and opportunities surrounding accessibility in Ontario, as summarized by theme below. Through discussions, a key tension emerged: some participants thought a certification model would be damaging to existing efforts to enforce compliance with AODA and the Code, while others felt a certification model could augment existing efforts to enforce legislation. This continued to be a central discussion in Phase 2.

Governance and leadership

- Ensuring diverse representation at every stage
- Promoting community networks of support and dialogue, including identifying early leaders and excellence champions
- Establishing mentorship and partnership relationships, leveraging central points of coordination (e.g., Business Improvement Areas Associations, Chambers of Commerce, Councils on Aging)

Model design

- Distinguishing between certification and compliance
- Ensuring clear objectives, including an aspirational, flexible and evolving model, a basis in recognition, and inclusive scope, and clear, actionable steps to accessibility
- Adaptability to different contexts, including different organizational types, sizes, and competencies
- Creating an accessibility toolkit

The economic argument and other incentives for business

- Addressing attitudinal barriers and lack of awareness
- Clearly communicating the economic argument and return on investment for accessibility
- Considerations for small business or community capacity
- Marketing accessibility
- Branding accessibility

Revenue model

- Designing a self-sustaining, low cost model

Implementation and scope

- Ensuring inclusive and transparent implementation
- Leveraging existing foundations, including lived experience, and evolving the model

Appendix B – Overview of Phase 2 guiding principles

Working Group guiding principles

60 working group members developed a set of 22 guiding principles and related recommendations, the result of discussion across five focus areas and with input from one-on-one interviews and online respondents. The focus areas broadly align with the Phase 1 discussion themes, the functional components of a potential accessibility certification model for business: model scope and design, incentives for business, governance and leadership, self-sustainability, and branding and marketing. Find the complete principles following, summarized by theme.

General principles

- The model should be simple, understandable, and easy to use for businesses, organizations, and other members of the community
- The model will include a clear definition of key terms to ensure common understanding, including accessibility and certification
- The model will be inclusive of persons of all ages and abilities, as well as adaptable to businesses of diverse types and sizes
- The model will increase awareness among businesses and the general public on inclusive design and user experience best practices
- The model will support businesses that seriously commit to the process of learning, improvement according to best practices, inclusion, and innovation in accessibility and user experience

Model design principles

- The model will be designed to perform four main functions: education, assessment, accreditation, and recognition
- The model will be a “hybrid” that combines grassroots, community feedback with an organizational structure that can establish benchmarks, marshal resources, award certification, and monitor the program’s effectiveness
- The model will evaluate businesses’ performance in serving the needs of the community rather than technical skills
- The model will feature public facing recognition, on tiered or graduated levels, to be re-evaluated on a periodic basis
- Any fees for service will be in proportion to the size and capacity of businesses, operating on a tiered system
- The model will start small by piloting in a community or specific sector and evolve to encompass other areas according to user feedback

Community participation principles

- The standard for performance worthy of recognition will be based in large part on lived experience, using community feedback and outcomes-based research in cooperation with participating businesses and municipalities
- Community feedback will be gathered and made publicly visible through diverse channels, and will include an prototype for businesses to provide feedback on their own challenges and progress in implementing accessibility
- Community feedback will be cycled back to businesses, organizations, and the certification leadership to inform, evaluate, and update standards of excellence on a continuous basis
- The certification program should feature a hub or platform of resources and initiatives to share knowledge, build community, and identify interdependencies
- The community or sector chosen for the pilot project will be selected based on the diversity of businesses and organizations, with as many types and sizes represented as possible

Legal principles

- Certification cannot and should not engage in or replace enforcement or compliance activities; that is the job of government and should remain so
- Obligated organizations are expected to be compliant with AODA and Ontario's Human Rights Code as a condition of achieving certification
- The model and all associated materials will be developed and delivered at the same time in both official languages and alternate accessible formats

Leadership principles

- The leadership model should be collaborative and feature more than one organization, with ties to a diverse range of communities and organizations representative of persons of all ages and abilities
- Leadership and governance of the model will be separate and distinct, with a collaborative, representative, and transparent accountability structure independent of leadership ensuring continuous evaluation of the model
- The program should engage with coordinating bodies, including chambers of commerce, boards of trade, and professional associations, to organize partnerships and mentorships that augment each organizations' capacity

Appendix C – Overview of Phase 2 points of deliberation

Certain key topics of discussion recurred throughout Phase 2. Some represent points where a participant differed from the majority in their perspective, some note key risks or considerations for implementation for the eventual certifier's contemplation.

The relationship between certification and legislation

There is a serious risk that if a certified business is not completely compliant with the AODA or the Code, the public might be confused as to the “accessibility” of the business; the business would also risk being found non-compliant.

Certification, however, would look at a different aspect of accessibility than legislation, offering a public-facing assessment of a business's performance. To claim that certification assesses compliance with the law would overstep technical and legislative powers. Certification would look at inclusive design and user experience, with legislation as the foundation or floor.

The relationship between certification and compliance

While the majority of participants agreed that a voluntary, recognition-based system could have some success in driving accessibility above and beyond compliance, some participants and members of the public expressed serious concerns that an accessibility certification model would lack credibility or enforceability. This could confuse or distract from enforcement of the AODA and could divert public funds to efforts that would risk harming accessibility in Ontario.

The model would not be subject to the same level of accountability and transparency as a government-run program. The organization leading the model, whether for-profit or non-profit, might benefit from increased profile and potential revenue. Finally, the standard for “accessibility” might not guarantee real access, as defined by the Code.

Ensuring rigour in a hybrid model

While a community-driven model would effectively raise awareness around the idea of accessibility, businesses need consistent and reliable standards to plan for the long-term. The eventual certification leader should note that self-assessment and voluntary self-reporting has not resulted in meaningful change or improvement in the past experience of participants.

Creating open and inclusive platforms for community feedback

The model should offer a variety of channels for gathering community feedback as many community members do not or cannot use social media or other technologies. Further, businesses should be positioned to provide data on the barriers to achieving compliance or the situations where they lack the capacity to achieve compliance or certification. Finally, information and data from the bottom up and top down functions

should be open for review and comment so that the community can continue to engage in the design and evaluation of the program as it evolves

Creating a transportable model

The aspiration is to create a portable program that could eventually work in other jurisdictions or achieve national coverage. Ontario and its legislative context could be a baseline, but the model should not be uniquely applicable to this province.

Reconciling the recognition of excellence and support for improvement

There may be a tension in the model between educating and supporting organizations' improvement and recognizing excellence. A business working towards compliance could still qualify for education and support without becoming certified right away. For instance, similar programs in other sectors award points for areas of strength while offering support for areas where the business is struggling.

The importance of collaborative leadership

Some participants felt that certification must be led by more than one organization. Certification is a partnership between business and the community and that partnership should be reflected in the leadership. One organization would be biased to their stakeholders and area of focus; further, existing organizations have many competing priorities and may not be able to give adequate attention to the program.

Piloting in a community versus a sector

While most participants agreed that the model should pilot in a community before growing to other jurisdictions, some maintained support for a sector-based pilot.

Notes on language and messaging

- Certification carries specific, often negative, connotations for businesses of an onerous or rigid process. As such, participants proposed that the model might refer to recognition rather than certification
- The focus should be on community or users rather than consumers as not all relationships are commercial
- The language of inclusive design will be useful in distinguishing the certification program from AODA and associated programming

Appendix D – Overview of Phase 3 model prototypes and public response

Accessibility Certification Model, proposed by AccessAbility Advantage (A+), a joint venture of March of Dimes Canada and Quadrangle Architects

Response

- 37 individuals commented on this model
- 74% thought that the model was likely to raise public awareness of accessibility
- 71% thought that the model was likely to influence a business to change its practices
- Ratings of the model were evenly distributed, with 76% rating the model between 2 and 4 stars on a 5 star scale

Overview of prototype and response

The Accessibility Certification Model is a comprehensive and inclusive accreditation system built on the scope and legal framework of the Accessibility for Ontarians with Disabilities Act (AODA), with complementary programs including Membership, Education, and Sponsorship.

The program would be led by an established, independent not-for-profit organization. A Board of Directors representing private and not-for-profit stakeholder agencies would provide subject matter expertise. Accreditation would be granted by professional auditors and would be based on a recognized set of standards, including any legislated accessibility requirements, best practices, research, evidence-based design, and community and user feedback. Fees for service would be charged flexibly in proportion to the size and capacity of a business or organization.

Respondents liked:

- The clear and flexible scorecard evaluation tool
- The use of recognized standards, best practices and existing research to adapt and update program practices
- The well-defined and implementable pilot phase
- The credible and well-established lead organization

Potential improvements:

- More detail on how the scorecard would work, how subject matter experts would be chosen, and how information would be shared with businesses
- More emphasis on including individuals with lived experience, training and support, and components of accessibility outside of AODA standards

Accessibility & Inclusion Index, proposed by Canadian Business SenseAbility (CBSA)

Response

- 32 individuals commented on this model

- 62% thought that the model was likely to raise public awareness of accessibility
- 66% thought that the model was likely to influence a business to change its practices
- 69% rated the model between 3 and 4 stars on a 5 star scale

Overview of prototype and response

Canadian Business SenseAbility (CBSA) proposes expanding the capacity of its disAbility Inclusion Index (DII) to include evaluation by an accredited professional and recognition for businesses who score well on the index.

CBSA member companies are guided annually through a corporate self-assessment using the *disAbility Inclusion Index* (DII). The tool helps companies assess and measure their progress on key aspects of disability inclusion and accessibility and identify opportunities for improvement. The SenseAbility advisory team would help members focus on their specific opportunities and guide improvement, recognizing exceptional achievement with certification. CBSA would charge membership fees for some services, pro-rated to the size of the business.

Respondents liked:

- The use of a pre-existing index assessment tool
- A leader with established resources and partners in the business community, allowing a quick program launch
- The mentality that accessibility benefits everyone
- The focus on the economic argument for accessibility

Potential improvements:

- More detail on the content and scalability of the tool
- More detail on the sustainability of the model and the affordability for businesses of all sizes
- Further collaboration with not-for-profits or the broader community

Business Innovation Guide for Inclusive Design and Accessibility (BIG IDeA), proposed by the Inclusive Design Research Centre

Response

- 33 individuals commented on this model
- 93% thought that the model was likely to raise public awareness of accessibility
- 93% thought that the model was likely to influence a business to change its practices
- 80% rated the model 4 or 5 stars on a 5 star scale

Overview of prototype and response

The BIG IDeA consortium would develop a platform to support customers in finding and reviewing accessible businesses (similar to Trip Advisor, but for accessibility); businesses in finding accessibility tools and resources; and the development and

showcasing of innovative approaches to accessibility challenges. The platform would also support an awards program for businesses that achieve or exceed a level of inclusive design, showcased online and through live events.

The consortium, led by the [Inclusive Design Research Centre](#) (IDRC) and hosted by the [Inclusive Design Institute](#), would manage the platform. Business innovation in inclusive design would be assessed through a dual process of continuous customer reviews combined with verification by an expert panel, encouraging a virtuous cycle that promotes prosperity and leadership in inclusive design. A nominal membership fee would be charged for consortium membership (open to all, pro-rated to the size of the business and subsidized for not-for-profit organizations).

Respondents liked:

- The platform design and the transparency of the approach
- The appeal to business through inclusive design and a resource bank
- The equal consideration for consumers, businesses, and the community and the platform's ability to connect the three
- The collaborative, user-centred approach

Potential improvements:

- Clearly defining safeguards to verify the accuracy user reviews
- Less complexity
- More detail on process and cost to business

Certified4Access, proposed by Get Inclusive

Response

- 74 individuals commented on this model
- 95% thought that the model was likely to raise public awareness of accessibility
- 90% thought that the model was likely to influence a business to change its practices
- 83% rated the model 4 or 5 stars on a 5 star scale

Overview of prototype and response

The model would be four-part, including accessibility needs assessments, experiential training and assessment, reports with feedback, and certification. A centralized website would showcase organizations that are Certified for Access, including their rating in key categories, end user reviews and validation, resources for businesses, and various branding incentives, including recognition decals with tiered levels of strength.

The leadership will be a collaboration among certification experts and community organizations interested in promoting the cultural shift to inclusivity for people of all ages and abilities. Subject matter experts and leadership would provide staff/volunteer sensitivity, advice on removing barriers to access, and centralized access to resources and information, including for trainers and trainees. Revenue would come from membership and proceeds from fees-for-service.

Respondents liked:

- The incorporation of people with lived experience
- The clear four-part approach to continuous improvement and the centralized, public-facing website
- The leadership from respected industry leaders in the accessibility community
- The fact that the prototype has already been piloted

Potential improvements:

- More detail on how accreditation and standard-setting might be realized
- More detail on sustainability and revenue
- More information on the role of mentorship in the program

Certified for Access, proposed by T4G

Response

- 57 individuals commented on this model
- 85% thought that the model was likely to raise public awareness of accessibility
- 85% thought that the model was likely to influence a business to change its practices
- 67% rated the prototype at 5 stars on a 5 star scale

Overview of prototype and response

T4G proposes to help deliver a program that will recognize, incentivize and encourage awareness on inclusive design and user experience. Businesses and organizations will have access to affordable and sustainable ways of embracing accessibility and will receive recognition for meeting criteria associated with a given tier: learner, supporter, advocate, and champion.

T4G would partner with recognized organizations who can provide leadership in accessibility design and physical space. Assessment would be done by experts and validated by user reviews. Businesses would receive an assessment and remediation report as well as a certificate of recognition, paying a nominal, tiered fee based on the number and size of locations to be reviewed, the organization's revenue, and any additional costs for remediation and reassessment.

Respondents liked:

- The simplicity and portability of the model
- The focus on collaboration amongst organizations
- The tiered, recognition-based approach
- Healthy competition and mentorship as incentives for business

Potential improvements:

- More clarity on how a sector-based pilot would work in a smaller community
- More detail on implementation and inclusion of persons with lived experience
- Defining the partners and collaborators

RHF Certification Program, proposed by the Rick Hansen Foundation

Response

- 33 individuals commented on this model
- 93% thought that the model was likely to raise public awareness of accessibility
- 87% thought that the model was likely to influence a business to change its practices
- Response was distributed evenly at the upper end of the scale, with 71% rated the model 4 to 5 stars on a 5 star scale

Overview of prototype and response

The RHF Certification Program, to be approved and recognized in Ontario and scalable around the world, would provide independent, third-party verification and recognition that public or private spaces are meeting the highest possible levels of inclusive design in the built environment.

The program would be led by the Rick Hansen Foundation (RHF) and its delivery partners, including Adaptability Canada and the Canadian Standards Association, among others. Businesses would be assessed according to an inclusive design rating tool, with citizen reviews validating recognized businesses. RHF would coordinate the certification and rating system, recruitment and accreditation of persons with disabilities as accessibility assessors, consulting services, and training and educational services. The program would be hosted on the existing Planat database. Government funding would cover operational costs during the pilot phase, with fees for service charged to businesses in addition to a range of other revenue streams in the post-pilot phase.

Respondents liked:

- The defined and comprehensive outcomes and implementation plan
- The basis in the successful LEED program approach
- RHF's strong existing organizational partnerships and international brand recognition in the accessibility space
- The fact that the program and Planat database have been successfully piloted in British Columbia

Potential improvements:

- Broadening the scope beyond built environment
- More detail on how citizen reviews would inform certification

Training Academy Awareness Program, proposed by Marisol Pestana

Response

- 26 individuals commented on this model
- 44% thought that the model was likely to raise public awareness of accessibility
- 26% thought that the model was likely to influence a business to change its practices
- 94% rated the model 1 to 3 stars on a 5 star scale

Overview of prototype and response

The Training Academy Program is an educational program, using classroom modules, customer experience case studies, etc. to discuss daily work activities that intersect with accessibility in the travel and tourism industry. The program would also provide information from another economic sectors which could related to and affecting the travel and tourism industry. The seminars would be posted on a web site or other social media platforms after the in person session.

The program would be delivered by a partnership of travel and tourism boards and associations for their members and employees (e.g. airports, hospitality associations, tourist attractions and recreation venues). The cost of the program would be calculated based on cost of materials and of hiring professionally educated trainers. Registration fees would include one price for members and different price for non-members.

Respondents liked:

- The sound approach to education, awareness, and training
- The consideration for the range of types of disabilities
- A good attention to language and terminology
- The choice of sector, due to its size and breadth of clientele

Potential improvements:

- More detail on cost and sustainability
- More detail on the types of training provided
- Broadening the scope to other industries

Appendix E – Open dialogue and public engagement

As discussed, this process was chosen as a [Public Engagement demonstration project](#), part of [Ontario's Open Government Initiative](#). The intent was to maintain a transparent, open-ended, and rigorous process, seeking the broadest possible input on the merit of a certification model. Those with the requisite knowledge and experience to drive the design and development of an accessibility certification model were members of the public: individuals of all abilities, including businesses, certification experts, members of the not-for-profit and broader public sectors, and academia.

Open dialogue was used here to help participants achieve several key goals, including:

- A shared understanding among participants of their shared interests
- The development of a shared language to express these interests
- Identification of issues to be resolved, as well as opportunities to advance shared goals
- The development of new tools, systems, and practices to support collaborative action on these goals

Generally speaking, the process aims to foster trust and build the skills needed for collaboration, continuous learning and effective change-management so that organizations from different sectors could work together effectively to deliver the proposed new certification program for accessibility.

Appendix F – Summary of findings from the research and literature review

A literature review and series of research consultations was conducted over summer 2015 to gauge the level of interest and viability in certification as an approach to accessibility. The literature review included academic, industry and advocacy publications, complemented by key informant interviews with subject matter experts and targeted primary research. The research aimed to answer five fundamental questions:

1. How are other jurisdictions using certification programs to increase public awareness or to support an intended goal, such as increased accessibility for people with disabilities?
2. What is the appetite and potential uptake of an accessibility certification model?
3. What barriers have been identified in the successful implementation of other certification models?
4. What could an accessibility certification model look like?
5. Is an accessibility certification model feasible?

Why certification?

The research found that certification programs are an increasingly vital tool to support market transformation. The image below illustrates the virtuous cycle of certification, moving through seven steps: implementation of best practices, impact, assurance, credibility of claims, added value, demand, and supply, which leads back to the implementation of best practices.

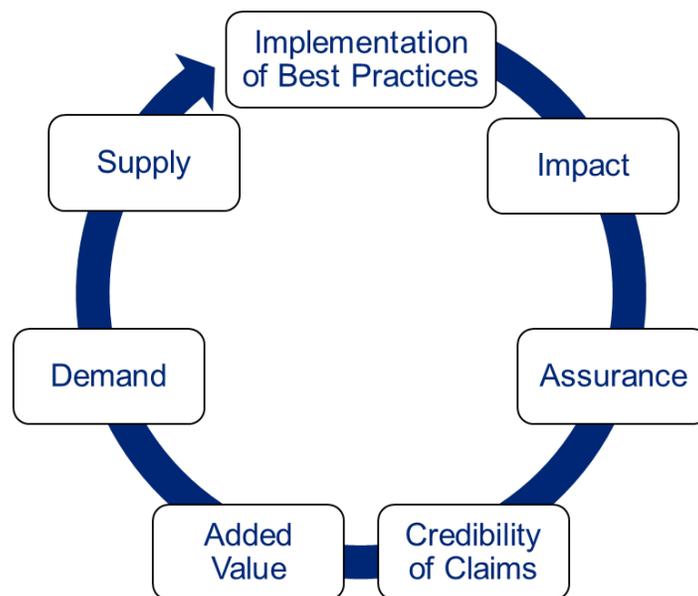


Figure 1 - Virtuous Cycle of Certification

Strengths and barriers for a successful certification model

The research identified certain strengths and challenges that apply across the range of potential certification models, based on a jurisdictional scan of 17 global comparator programs and a review of the literature on certification. Please note the following list is not exhaustive.

Strengths

- **Credibility:** in particular, the independence and objectivity offered by independent certifiers is viewed as a core strength.
- **Aligning Incentives through Multi- Stakeholder Engagement:** certification programs offer the opportunity for more inclusive and sustained participation from multiple stakeholders, helping to better align incentives towards improved outcomes.
- **Increasing Awareness & Influencing Market Behaviour:** certification programs can help incentivize organizations to further advance intended social and environmental goals beyond existing norms / practices.
- **Complementing and Influencing Existing & Future Standards / Regulations:** certification can be used as a tool to complement existing government standards and regulation (for instance, LEED and B Corp).
- **Formalizing & Harmonizing Standards & Best Practices:** certification can help to reduce confusion in the marketplace by helping to formalize and harmonize best practices.

Barriers

- **Undermining Existing Efforts:** certification programs must be carefully designed and positioned to complement existing standards and efforts on the ground. Failure to do so will result in contradictions and confusion in the marketplace.
- **Potential Bias towards Top Performers & Limited SME Adoption:** small and medium-sized businesses “may lack the financial and human resources necessary...and may not see the financial benefit of being certified.” Engaging multiple large and small stakeholders can help to address these challenges.
- **Eliminating Weak Performers:** certification can lack consequences for weak performers. As such, it may not always be the most effective means to “raise performance at the bottom of a sector.”
- **Free Riders:** those not participating in certification may still benefit if accessibility is not clearly defined, monitored, and evaluated.
- **Sustainability:** for programs to remain sustainable, they require continuous attention and flexibility to adapt to changing circumstances. Inability to do so can reduce program relevance, legitimacy and credibility.

Accessibility certification in Ontario

The review found that an accessibility certification model could be feasible in Ontario, given certain key considerations:

1. The need to continue to increase awareness and communicate the benefits of accessibility to stakeholders.
2. The importance of engaging a broad range of stakeholders to clarify objectives and ensure greater balance, flexibility, and relevance in the certification process.
3. Increased confidence in the use of a third-party certifier to provide credible, independent and objective assurances that program objectives are being met.
4. Early interest in an accessibility certification program in Ontario, which will be further explored through broader consultations.

These considerations were reflected throughout the certification consultation process in two ways. **First**, engaging a broad range of stakeholders was critical to ensuring that the certification model would reflect the needs of a broad range of interested communities. **Second**, Phase 1, 2 and 3 discussion confirmed the early interest in further exploring an accessibility certification program for Ontario. There was by no means consensus on the viability or design of a certification model. The value of the public consultation was in ensuring that the range of views on certification were heard and represented

Appendix G – Definition of key terms

Accessibility

While accessibility can mean something different to each individual, accessibility refers at a broad level to the relationship between a person's needs and goals and the environment or system in which they operate. It also means being respectful, inclusive, and providing access regardless of a person's ability.

Among many important benefits for persons of all abilities, accessibility enables inclusion in the workforce and economy. For businesses, it provides an opportunity to access a larger customer base and to increase productivity by welcoming a wide range of talent to their workforce. Estimates from the Martin Prosperity Institute suggest that increased accessibility could increase GDP per capita in Ontario by up to \$600 per annum.¹

Certification

Certification is a "process, often performed by a third party, of verifying that a product, process or service adheres to a given set of standards and/or criteria."²

As such, the term encompasses a broad range of models:

- Non-institutional (i.e., reliant on crowd-sourcing) or institutional (i.e., run by a central organization)
- Tiered or single-level; ratings-based or pass/fail
- Sector-specific or network-wide; geographically contained or portable to other jurisdictions
- Demographic-specific (i.e., a certain functional or interest area) or inclusive of a range

Accessibility certification will not replace or change the existing framework under the AODA. It is not intended to be an audit of AODA compliance. It is a voluntary opportunity for organizations to highlight themselves as leaders in accessibility and to demonstrate the level of excellence that organizations are able to achieve. Perhaps more critical than enhanced visibility is the opportunity to drive the bar higher and to encourage even greater levels of accessibility throughout society. The intention is to recognize accessibility champions, inspire innovation and to incentivize others to move above and beyond compliance with the AODA and the Code.

¹ Releasing Constraints: Projecting the Economic Impacts of Increased Accessibility in Ontario. Rep. Martin Prosperity Institute, n.d. Web. June 2015.

² Matus, Kira. "Standardization, Certification, and Labeling: A Background Paper for the Roundtable on Sustainability Workshop January 19-21, 2009."

Appendix H – References

- Building a Roadmap to Sustainability in Agro-commodity Production*. Rep. International Finance Corporation, Oct. 2013.
- Certiably Sustainable? The Role Of Third-Party Certification Systems," National Research Council, 2010.
- "Certification." International Standards Organization. ISO, n.d. Web. June-July 2015. <http://www.iso.org/iso/home/standards/certification.htm>
- Donovan, Rich. Creating Value Through Disability, 2014 Annual Report: The Global Economics of Disability. Rep. N.p.: Return on Disability, 2014. Print.
- Donovan, Rich. Translate Different Into Profit. Rep. N.p.: Presentation for the Conference Board of Canada, 2015. Print.
- Matus, Kira. "Standardization, Certification, and Labeling: A Background Paper for the Roundtable on Sustainability Workshop January 19-21, 2009."
- Mining Certification Evaluation Project. Rep. Jan. 2006. http://commdev.org/files/683_file_MCEP_Final_Report_Jan2006.pdf
- Releasing Constraints: Projecting the Economic Impacts of Increased Accessibility in Ontario. Rep. Martin Prosperity Institute, n.d. Web. June 2015.
- Vollmer, Derek. "Surveying the Landscape: Certification Schemes for Sustainable Products and Services." *Certifying Sustainable? The Role of Third-Party Certification Systems: Report of a Workshop (2009)*: 105-18.
- W3C Web Content Accessibility Guidelines 2.0 Approved as ISO/IEC International Standard." W3C. W3C, 15 Oct. 2012. Web. June-July 2015. <http://www.w3.org/2012/07/wcag2pas-pr.html>