

# ACCESSIBILITY CERTIFICATION CONSULTATION

Phase 1 Report: Identifying the Issues

March 2016 !

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## The Accessibility Certification Project

The principles of universal design dictate that by designing for the wide spectrum of human abilities, we can create things that are easier for all people to use. This universal access benefits everyone who plans, provides, or uses products and services. Similarly, steps to engage businesses, strengthen foundations, and promote a broader culture shift mapped out in Ontario's Accessibility Action Plan will not only benefit the one in seven Ontarians who have a disability, but all Ontarians and visitors to Ontario.

In committing to this plan, the Government of Ontario recognizes that a multi-pronged strategy will be most effective in addressing barriers Ontarians with disabilities continue to face as citizens, consumers and employees. An independent, voluntary accessibility certification-type model could be an important part of this strategy, promoting the value of accessibility beyond the current framework prescribed by the Accessibility for Ontarians with Disabilities Act (AODA) and in accordance with Ontario's Human Rights Code (the Code). The certification model will be designed and delivered by the people it will most impact – Ontarians with lived experience of barriers to accessibility, whether as consumers or businesses. This will take place through a public consultation and co-design process that will enable end users, including businesses and members of the broader community, to develop a model that will best serve their needs.

While accessibility can mean something different to each individual, accessibility at a broad level means being respectful, inclusive, and providing universal access, regardless of a person's ability. For persons with disabilities, 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.<sup>1</sup> An accessibility certification program would serve to:

- 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 !

Accessibility certification will not replace or change the existing framework under the AODA. It is not intended to be an audit of AODA compliance, but rather a voluntary opportunity for organizations to highlight themselves as leaders in accessibility and to

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

demonstrate the level of accessibility 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.

## Concerns about Certification

The mandate of Phase 1 was to explore the level of interest in an accessibility certification model, as well as to engage in a balanced discussion of its challenges, opportunities, and viability as an approach. Through Phase 1 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.

The majority of participants agreed that a voluntary, recognition-based system could have some success in driving accessibility above and beyond compliance, validating the continuation of the project. Some participants and members of the public, however, expressed serious concerns that an accessibility certification model would lack credibility or enforceability, confusing and distracting from enforcement efforts of the AODA, and may divert public funds to efforts harming accessibility in Ontario. These concerns were at the core viability of an accessibility certification model, regardless of consideration in design or implementation.

Some were wary of funding and efforts being put towards a voluntary program while the legally mandated AODA standards remain under-enforced. Feedback suggested that the government concentrate on support for compliance rather than support the development of new, duplicative system. The certification process might undermine or be perceived to replace full and comprehensive AODA audits or inspections and standards which organizations are obligated to follow. Further, participants pointed out that the Code already goes above and beyond AODA and that businesses should be striving this higher standard.

Businesses and consumers may not be aware that certification, while explicitly based on actions that go beyond compliance, does not guarantee compliance. This would undermine consumer certainty and confidence in compliance and in certification, should it go forward.

Further concerns surrounded the independent and private nature of the proposed program. The model would not be subject to the same level of accountability and transparency as a government-run program. Further, the standard for “accessibility” might not guarantee real access, whether based on AODA standards or a higher benchmark. Finally, the organization leading the model, whether for-profit or non-profit, might benefit from increased profile and potential revenue.

## The Certification Spectrum

Certification refers to 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.”<sup>2</sup> As such, the term encompasses a broad range of models, differing in their scope, design, incentive structure, and leadership. Certification might be:

- 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

The reader should consider the discussion contained in this report as a first step to determining where an accessibility model could best fit on the certification spectrum so as to establish itself as an enhancement, rather than a duplication or undermining of legislative structures.

## A Certification Model for Business

While this process is open-ended, with no pre-determined vision of what an accessibility certification could look like, the choice of model should motivate businesses to incorporate accessibility into their operations and service delivery. Each business, regardless of sector or size, should see accessibility as a value and certification as viable in their context.

Through our discussions, we asked businesses three questions:

- 1) What motivates you to make changes to your business?
- 2) What could certification do for you?
- 3) How would you describe your level of awareness and/or comfort with accessibility?

Speaking from various industry views, business owners identified improving customer experience, increasing revenue, growing the customer base and improving branding and marketing opportunities as key motivators for change to their business model. For instance, one entrepreneur saw a gap in the market for accessible communications solutions and took the opportunity to develop an innovative service for corporations

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<sup>2</sup> Matus, Kira. “Standardization, Certification, and Labeling: A Background Paper for the Roundtable on Sustainability Workshop January 19-21, 2009.” *Certifying Sustainable? The Role of Third-Party Certification Systems: Report of a Workshop* (2009): 79-104.

looking to broaden their service offerings. Customer experience can refer to increased customer satisfaction and to an outstanding product or experience design.

Particularly business owners with a high degree of awareness and experience with accessibility saw a link between these key motivators and certification. Certification could help to expand their client base, diversify services, and welcome new, talented employees, in turn increasing revenue. Businesses could proactively position themselves to tap into the growth in demand for socially responsible business practices, the market of persons with disabilities, and the large population of seniors. Recognition and visibility for businesses that show excellence in accessibility is a further driver for change.

While some business owners had a high degree of awareness when it came to accessibility, this was mostly due to past experience in the field. While many employers described themselves as dedicated to diversity and inclusion, many were overwhelmed as to how to go about improving accessibility. Some participants suggested clear, comprehensive, and publicized AODA standards and enforcement as a more effective and accountable route. Others emphasized that while many resources exist with regards to legal accessibility obligations, they saw a need to also increase awareness on the accommodation needs specific to their community.

### Strengths and Challenges to a Successful Certification Model

Research conducted by Deloitte over summer 2015 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. The following list is not exhaustive, but is rather intended as a starting point to prompt further discussion:

Table 1: Strengths and Potential Challenges in Certification<sup>3</sup>

Strengths	Challenges
<ul style="list-style-type: none"> <li>• <b>Credibility:</b> in particular, the independence and objectivity offered by independent certifiers is viewed as a core strength.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Undermining Existing Efforts:</b> 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.</li> </ul>

<sup>3</sup> "Certifiably Sustainable? The Role of Third-Party Certification Systems." National ! Research Council, 2010. July 2015. ! <[http://www.nap.edu/openbook.php?record\\_id=12805](http://www.nap.edu/openbook.php?record_id=12805)>. !

Strengths	Challenges
<ul style="list-style-type: none"> <li>• <b>Aligning Incentives through Multi- Stakeholder Engagement:</b> certification programs offer the opportunity for more inclusive and sustained participation from multiple stakeholders, helping to better align incentives towards improved outcomes.</li>   <li>• <b>Increasing Awareness &amp; Influencing Market Behaviour:</b> certification programs can help incentivize organizations to further advance intended social and environmental goals beyond existing norms / practices.</li>   <li>• <b>Complementing and Influencing Existing &amp; Future Standards / Regulations:</b> certification can be used as a tool to complement existing government standards and regulation (for instance, LEED and B Corp).</li>   <li>• <b>Formalizing &amp; Harmonizing Standards &amp; Best Practices:</b> certification can help to reduce confusion in the marketplace by helping to formalize and harmonize best practices.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Potential Bias towards Top Performers &amp; Limited SME Adoption:</b> small and medium-sized businesses “may lack the financial and human resources necessary...and may not see the financial benefit of being certified.”<sup>4</sup> Engaging multiple large and small stakeholders can help to address these challenges.</li>   <li>• <b>Eliminating Weak Performers:</b> 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.”<sup>5</sup></li>   <li>• <b>Free Riders:</b> those not participating in certification may still benefit if accessibility is not clearly defined, monitored, and evaluated.</li>   <li>• <b>Sustainability:</b> 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.</li> </ul>

A program’s balance of any of these strengths and challenges will differ based on the design and approach of the model. A non-institutional or crowd-sourced approach can easily adapt to changing technology and regulations, but may showcase rather than actively harmonize best practices. On the other end of the spectrum, a purely institutional approach can help to formalize and align standards to a high degree of

<sup>4</sup> Mining Certification Evaluation Project. Rep. Jan. 2006.

<[http://commdev.org/files/683 file MCEP Final Report Jan2006.pdf](http://commdev.org/files/683_file_MCEP_Final_Report_Jan2006.pdf)>.

<sup>5</sup> “Certifiably Sustainable? The Role of Third-Party Certification Systems.” National Research Council, 2010.

credibility. The more rigid structure, however, may contradict or distract from existing efforts and may lack the flexibility to adapt to different business types and capacity.

Based on the same jurisdictional scan of existing programs, Deloitte identified six key design considerations for a successful certification model. While each factor was given more or less weight based on the program context, successful programs (in terms of visibility, uptake, reach, user endorsement, etc.) incorporated most or all criteria in some capacity. Participants in the accessibility certification consultation process may consider how these apply to the Ontario business context:

1. The need to engage multiple stakeholders throughout the certification ! development process. !
2. The need to develop a clear understanding of the underlying issue(s) and ! objective(s) of the certification program. !
3. The need to develop standards that are balanced, flexible and directly aligned with the underlying goals of the program.
4. The use of a trusted, third-party certifier to provide credible, independent and objective assurances that program objectives are being achieved.
5. The use of logos and other incentives to promote interest and uptake in a ! certification program. !
6. The use of a pilot program and well-defined monitoring and evaluation ! procedures to ensure long-term relevance and success !

## Public Consultation and Engagement

The people impacted by an accessibility certification model, including those with first-hand knowledge, lived experience, and expertise, will own its design and development. The Accessibility Directorate of Ontario (the Directorate) has engaged Deloitte to facilitate an open, multi-stakeholder public consultation to catalyze this process. Accessibility advocates, persons with disabilities, businesses, certification experts, non-profit organizations, and the broader public sector will come together through a variety of channels to provide recommendations to the eventual third party certifier (see below) on the objectives, design, feasibility, and implementation of an accessibility certification model.

This process relies on constant engagement with the public, seeking input through social media and an online platform, [certifiedforaccess.ca](http://certifiedforaccess.ca), to inform in person discussions and, in turn, feeding in person topics back to the website for comment. The intent is to maintain a transparent and open-ended process and to bring as many individuals and organizations as possible into the accessibility community. The process's facilitation and development of outcomes unfold independent of government.

Whatever model emerges from this process will be driven and built by stakeholders and will base its credibility on public approval.

Ultimately, public consultation and engagement is about trust and openness. As parties explore what kind of accessibility certification model they want, the hope is that they will deepen their understanding of common interests, expand their use of shared language, clarify issues and opportunities, and build new tools, systems, and practices to support collaborative action. This could help foster a culture of collaboration, continuous learning and effective change management. This form of community building manages the communities' collective interests and highlights opportunities for the community to work together to solve problems going forward.

## Key Themes and Considerations

Five key themes emerged through Phase 1 discussions, held in person, online, over the phone, and one-on-one. Phase 2 working groups will use these five themes as the foundation for a more detailed discussion of the design, development, and delivery of a certification model.

### Governance and Leadership

Participants discussed who could lead, champion, and implement an accessibility certification model. Phase 2 working groups might consider how to ensure the lead represents a diversity of perspectives and leverages existing networks.

#### Key Discussion Points

##### Ensuring diverse representation at every stage

- Collaboration and partnership should underpin the design, development, and implementation of a certification model, balancing representation of lived experiences and technical expertise
  - Persons with disabilities should be present at every step of the process, representing a range of perspectives and lived experience; accessibility is different for everyone and needs to be defined so that no voice is left out
  - Persons with technical expertise in facilitation, certification, and AODA standards should be involved in steering development and implementation
- Participants were concerned that one organization might have undue influence over the design and implementation of the model
  - Representatives from a broad range of communities and interests should be included in every stage of development and delivery; a network of supports may more effectively encourage uptake than a centralized delivery body
  - The certifying body or bodies and its/their partners would have to have credibility across communities (e.g., French and English, business and advocacy)
- Businesses should be evaluated based on the experience of accessibility rather than the claims of the organization
  - The users of facilities and services would judge a location's accessibility
- A certification model could draw on the perspective of individuals with barriers to accessibility, whether by certifying individuals or through advisory committees
  - The age-friendly movement, for example, addresses lived experience across the spectrum of daily living and might serve as a template

##### Promoting community networks of support and dialogue

- The model could identify excellence champions or leaders that exhibit a superior achievement in accessibility, incenting other businesses to follow suit, promoting best practice examples, and building avenues for collaboration and community

- Champions could be corporate, sector-designated, or representative of the small business perspective
- Established research and advocacy organizations could play a key role in the design and implementation of a certification model, leveraging best practices and expertise in a given field to establish common understanding and to facilitate collaboration
- The accessibility and business communities should communicate and collaborate; businesses would benefit from knowing clearly “what’s in it for them” and how to take the first steps
- A universal set of accessibility standards could be integrated into business, computer science, and other educational curricula, pushing new businesses to create unique and competitive accessibility strategies

### Establishing mentorship and partnership relationships

- The model could leverage accessibility champions in various networks, establishing central points of coordination (e.g., Business Improvement Area Associations, Chambers of Commerce, Councils on Aging) for small and medium enterprises and facilitating mentor and partner relationships
- Collaboration, whether facilitated by the certifying body or through a central point of coordination, might be between businesses or could involve sharing best practices between educational institutions, large for-profit, or non-profit organizations and smaller businesses
  - Sector-specific leadership could be the point of contact between various local partners
  - Partnerships could leverage the skill sets and experiences of different businesses and existing organizations, creating an approach based around the initiatives and specific needs of each community
  - Mentorships may emerge organically, but would be based upon clearly defined criteria set by a recognized, credible, and accountable certifier that can ensure accountability
  - The certifier or a coordinating body could launch a public registry of available mentors and interested mentees

### Points for Further Dialogue

While participants broadly agreed on the above points as foundational considerations, Phase 2 working groups could further discuss the following points:

- Would accessibility mentors be other businesses (e.g., early adopters), large organizations (e.g., big banks), individuals with disabilities, or organizations in the non-profit or public sphere?
- Would mentorships and partnerships be structured or encouraged to develop organically?
- Would coordination come from the public sector (e.g., Municipal Advisory Boards, the provincial Partnership Council), the private sector (e.g., Business

Improvement Area Associations, Chambers of Commerce), educational institutions, or the non-profit sector?

- Would one organization or an association of organizations own and implement the model?
  - How centralized or decentralized would the certification model leadership be?
  - Would centralized leadership give too much power to one group or perspective? Would a decentralized model have enough structure to hold businesses accountable?
- How would local partners or organizations be involved?

### **Key Takeaways for Designing the Model**

Participants agreed that a collaborative, community-led program with an inclusive and diverse leadership would be most likely to achieve success. That said, participants differed as to who would deliver the model.

**“The subject matter experts are the people with lived experience. They must be the key collaborators in this journey.”**

## **Model Design**

Participants discussed both guiding principles and practical design considerations for an accessibility certification model. Participants emphasized that a certification model would have to be simple, fluid and evolving, able to adapt to different accessibility requirements and business types. It would also incorporate elements of both awareness-building and concrete actions.

### **Key Discussion Points**

#### **Distinguishing between certification and compliance**

- Certification would recognize effort and commitment in going above and beyond AODA standards and in complement with the Code, with foundations set beyond compliance
  - Some participants noted that the Code would serve as a more suitable baseline as it goes above and beyond AODA
- Certification should ensure that the principles and legislative requirements of equity and human rights are maintained in the design, scope, and implementation of the model
- The distinction between compliance and certification should be reinforced by who leads certification (third party vs. government), the method of enforcing certification (customer endorsement, regulation, etc.), and the language used to describe the process (e.g., accessibility vs. universal access)

- It will be especially important to distinguish between accessibility and universal design
- Participants differed on whether certification should be based on self-assessment or external evaluation, though all agreed that the model needed a system to keep the process accountable and ensure that certified businesses are truly accessible

### Ensuring clear objectives

- The certification model would be a living entity that is aspirational, flexible, and evolving
  - It would encourage businesses to think about the whole range of customer needs, beyond physical accessibility
- Certification would be a model of recognition based on an individual's experience, representing the full diversity of what "accessible" might mean !
- The model would have clearly defined objectives, guidelines, or guiding ! principles with a toolkit of resources to support uptake !
  - The model would incorporate elements of awareness-building and education as well as practicable actions
  - A "one-stop shop" for tools and support would help businesses overwhelmed by resources and uncertain where to start
  - The model would be designed with the understanding that it might be scaled to other jurisdiction and with an eye to harmonization with other provinces
- The model would be simple, identifying accessibility foundations with clear and actionable next steps for businesses (e.g., an accessibility playbook)
  - The model could involve levels of accessibility, with universal access as the end goal
  - Participants were divided on whether a checklist with ratings or a pass/fail system would be more transparent and effective
  - Business could be recognized, rewarded, or given publicity as encouragement for gradual improvements
  - Some participants referenced the Business Disability Forum's Accessibility Maturity Model as an example of a matrix that allows businesses to start from a baseline of accessibility (set above compliance) with clear direction on how to evolve

### Adaptability to different contexts

- The model could be adaptable to different business types and sizes and flexible enough to incorporate new technology and innovation
  - Participants were concerned that a one-size-fits-all certification would be ineffective; the model could address specific capacity, skill sets, or levels of experience
  - Allowing businesses to start with a baseline and evolve according to their needs, knowledge, and expertise would ensure accessibility and continued competitiveness
  - Special attention should be paid to the capabilities of small business

- A personality test or customer experience rating would allow businesses to identify which accessibility measures beyond compliance are most relevant to them and their business

### Creating an accessibility toolkit

- Businesses could use an accessibility toolkit, a set of simple, low-cost tools packaged collaboratively between individuals with lived experience and a broad range of sectors
  - Small, easy to implement changes might include having menus with bigger print or braille, reducing clutter in a retail space, etc.
  - Training staff to be knowledgeable on a range of accessibility-related topics vastly improves the customer experience
- There are a wealth of existing tools and programs that could serve as resources or component parts of a certification model
  - Resources could include a registry of accessibility specialists, a digital library of videos and training support resources, a network of mentors or support groups, or a discussion forum
  - Post-secondary students might lend expertise in universal design
- Leveraging crowd sourcing and networking technology would empower individuals (e.g., through ratings or endorsements) and build communities around accessibility in the long term
- Participants noted that a system for customer endorsement would have to be simple and universally understandable (e.g., using pictures instead of words or a voting system rather than a complicated ratings process)
  - Built-in mechanisms for feedback from those most impacted by the model could maintain its relevance and uptake

### Points for Further Dialogue

While participants broadly agreed on the above points as foundational considerations, Phase 2 working groups could further discuss and find consensus on the below points. The range of models implied by the term “certification” was a particular topic of focus.

- What could certification look like? Does the word imply an institutional, ! standards-based system? !
  - Would the model recognize progressive success or evaluate businesses according to instructions or criteria? Would a pass/fail or an incremental system be more appropriate?
  - Would a checklist be useful in highlighting simple tweaks to improve accessibility or would it be too superficial to lead to meaningful change?
- How can the certification model build on existing tools? Is another model ! superfluous? !
- Would progress towards certification be determined by self-assessment or an administered test?
- Would the model prioritize either awareness-building or simple, practical steps? Is certification a more effective tool for one or the other, or both?

- What are the immediate steps that will lead to a sustainable model?

**“An accessibility certification model should clearly define guidelines to establish expectations [for the procuring client]. The model could include an Advisory Council to monitor and modify the program, a registry of certified individuals or organizations, and a...measurement of maturity from year to year.”**

**“To address commonly faced attitudinal barriers, we developed a Learning Lab. The Learning Lab focuses on educating business owners on the various types of disabilities and how they can educate their staff. It also includes information on people-first language.”**

### **Key Takeaways for Designing the Model**

Participants agreed that a multi-pronged strategy that promotes awareness and offers simple, actionable solutions would be most attractive to businesses in the short term and most sustainable in the long term. Participants discussed whether the model would prioritize one strategy over the other as well as how the model might recognize and encourage excellence beyond compliance.

**“Creating a certification program or model or guideline or whatever you want to call it - if it doesn't include the people that these services address at every step of the process...then you are not going to get that trust. It is going to become another governing body that people with disabilities don't get. Having the lived experience needs to be included in every step of this process.”**

**“We all have varying levels of ability. We also have varying levels of support to help us to live independently in the community. So, when we say a business is accessible, I want to know, in whose eyes?”**

### **The Economic Argument and Other Incentives for Business**

Participants saw the need for a broad culture change surrounding accessibility and deliberated on what would make a certification model particularly attractive to businesses. Given participants' agreement that there is an economic argument for accessibility, Phase 2 working groups might consider the different challenges facing small businesses and large organizations looking to embed accessibility and how to communicate the value of universal access to each of these groups.

### **Key Discussion Points**

## Addressing attitudinal barriers and lack of awareness

- Attitudes and a lack of awareness are the main barriers to accessibility; the main strength of the certification approach is in addressing these barriers and encouraging a cultural shift
- Many businesses want to be accessible but do not know what that means or how to do it
  - The model could provide guidance on how to incorporate accessibility in strategic planning, with recognition for organizations that do it well
- A focus on productivity and enabling technologies could link accessibility to other business challenges related to attitudinal or systemic barriers, such as adapting to a digital economy or more collaborative management structures
- Increasing employee awareness of accessibility and the needs of persons with disabilities in the community can often make as much of an impact as structural accommodations
  - People with intellectual disabilities often encounter employees who speak to their support persons rather than directly to the individual
  - Employees are often unaware of invisible or undisclosed disabilities
  - Participants expressed having had positive experiences in other jurisdictions (e.g., Vancouver, Quebec) where employees were focused on providing a welcoming and inclusive experience for each individual customer

## Communicating the business case for accessibility

- Businesses need clear demonstration that they will get a return for their investment in accessibility !
  - The messaging surrounding a certification model would address two key questions from business: “Why should I do this?” and “What’s in it for me?”
  - Businesses can identify with opportunities that result in more customers or more revenue
- There is an economic argument, supported by market research, that accessibility positively impacts a business’s bottom line in the long run
  - Accessibility could be integrated into a company’s growth strategy – from management policies to tools for increased productivity
  - If market competitiveness were based on an organization’s level of accessibility (if society had high expectations), businesses would be more likely to adopt it
  - Sensitivity training for business owners, management, and staff (similar to the dementia friendly business initiative) could lead businesses to plan for expenses that will improve service to all potential customers
- The certification model should account for small businesses’ lack of capacity and large organizations’ conflicting mandates and regulatory fatigue
  - Several participants suggested an approach that starts by asking what each business’s customers need

- Universal design could serve as a foundation for the business case by promoting the idea that accessibility is good for everyone
  - If businesses think of universal access as more than an add-on, but as a benefit to all consumers and employees, it could generate interest beyond compliance

### Marketing accessibility

- Messaging could shift the focus from customer service to the customer experience; businesses are more likely to see the value in accessibility if it is tied directly to their customers' needs
  - Putting a human face to accessibility through stories and vignettes would help businesses make the connection between accessibility and their customer base
- Businesses are likely to be motivated by appealing to the large demographic of aging seniors as an untapped customer base
  - Applying an age-friendly lens in the planning, development, and service delivery of a business offers a dynamic economic benefit in its appeal to customers of all ages
- Using language and tools familiar to business (e.g., profit, rationale, ! organizational efficiency; a star or rating system) could promote uptake !
- Celebrating accessibility champions and success stories could spur healthy competition and collaboration between businesses

### Branding accessibility

- Marketing the accessibility brand could serve two purposes: to position access as a competitive edge and to signal accessibility to customers
  - The pride associated with displaying the accessibility “brand” would give it power
  - Co-branding with other initiatives (for examples, the age-friendly movement) could build on successes and increase momentum
- Branding could raise awareness and bring accessibility into the mainstream through logos, published scoring, advertising, press coverage and social media (as with LEED, Better Business Bureau, and B Corporation)

- Logos, ratings, and press coverage would be simple and recognizable by people with a wide range of physical and intellectual disabilities

**“All these different trainings and certification programs and...separate pieces of things...what I would like as someone who has limited resources but is aware of accessibility and wants to do it well is for someone to walk me through the steps to become excellent.”**

**“Deaf Blind Ontario Services’ Accessibility Guidelines...emphasize the inclusion of efficient design, space maneuverability, the importance of illumination, and the use of colour, texture and specialized products. Contrary to popular belief, accessible design does not need to be expensive and may esthetically enhance a space.”**

### **Points for Further Dialogue**

While participants broadly agreed on the above points as foundational considerations, Phase 2 working groups could further discuss and find consensus on the below points. The key question for participants was: How can we motivate change?

- Can a certification model increase profitability for businesses by enhancing accessibility and improving service to individuals with disabilities?
- What is most likely to incentivize business? Subsidies? Regulatory consequences? Recognition and reward? A strong business case? Greater awareness?
- Will an incentive-based system increase accessibility or “preach to the choir”?
- While an incremental approach is more likely to be attractive to business, could businesses be aiming for more from the outset? Would more aggressive benchmarks discourage businesses from doing more than the bare minimum?

### **Key Takeaways for Designing the Model**

Participants agreed that businesses needed clear evidence of the return on their investment in accessibility, but were divided on how best to communicate this evidence and motivate change. A certification model would carefully consider which incentives

**“Access drives your bottom line. There is an audience out there that wants to consume...your products and your services and allowing them the widest possible access is inevitably going to increase your bottom line.”**

**“At the end of the day, we can talk about the great opportunity there is to grow our business, but you will not see a specific or a sudden surge because you’ve done the right thing to do. To me it is about certainty and it is about customer experience.”**

would be most effective – for instance, awards, recognition, press coverage – as well as which resources and educational support businesses might need.

## Revenue Model

Participants reached consensus on some broad principles of a self-sustaining certification model. Phase 2 working groups might draw on the revenue models of existing certification tools when designing an independent, voluntary, low cost model.

### Key Discussion Points

#### Designing a self-sustaining, low cost model

- The certification model would not rely on government; it would be led ! independently !
- The lead organization would need start-up funding to cover staff and operating costs in the short term
  - The investment required will depend on whether the model is designed to educate or to administer, whether it is owned by a centralized body or crowd-sourced, etc.
- The certification model would need to be self-sustaining, with established ! revenue streams !
  - Securing adequate financial resources will be critical to maintaining an evolving, flexible model
  - Funds should be used for initiatives that benefit the accessibility and business communities, rather than individual organizations or enterprises
- To be attractive to business, the certification model would need to be low cost and easily accessible to small and medium enterprises as well as non-profit sector providers
  - Certification might charge nominal fees for either assessment or “upper tiers”, including awards submission, extra support resources, etc.
  - The model would provide flexibility for adjustment depending on the type of business or the demographics of the customer base
- The certification model would have the potential to be transportable and scalable in other jurisdictions

### Points for Further Dialogue

While participants broadly agreed on the above points as foundational considerations, Phase 2 working groups could further discuss and find consensus on the below points. As the focus of Phase 1 was on broader issue identification and foundational principles, Phase 2 and Phase 3 discussion could more tactically examine how a certification model might be equitable and self-sustaining.

- Would the program charge fees for resources, advertising, or services, or would it remain cost-free for businesses?
- How could a certification model be sustainable to operate while staying ! affordable for small businesses? !
- How might the model balance the accommodating regional differences and setting reliable and universal standards?

### **Key Takeaways for Designing the Model**

Online and in person participants agreed that there were many existing programs that could serve as funding model templates, though the choice of funding model may largely depend on the governance, leadership, and scope chosen for an accessibility certification model.

### **Implementation and Scope**

Participants agreed that the scope and implementation of an accessibility certification model should be based on principles of inclusion, co-design, shared ownership, and transparency.

### **Key Discussion Points**

#### **Ensuring inclusive and transparent implementation**

- The scope of certification would be determined according to principles of ! inclusion, transparency, and learning !
- The model would go through a pilot phase, with a defined procedure for feedback, evaluation, and continuous improvement !
- Participants agreed that not all businesses need all accessibility accommodations, and enterprises may approach certification with different levels of competence. Many participants, however, felt that the model should avoid excluding any one functional area, sector, or accessibility challenge
  - One approach suggested by participants would be to start with more coordinated sectors or regions, with a roadmap to expand to other areas
  - Others suggested that all disabilities could be included, but with designation for each type (for example, like hotel listings with logos for a swimming pool, restaurant, spa, etc.)
  - Participants noted that certification should take into account the whole supply chain or ecosystem of services, including infrastructure planners and manufacturers

#### **Leveraging existing foundations and evolving the model**

- The certification model could start from foundational principles or a belief in the process of achieving accessibility, to be differentiated according to type and size of businesses as the model matures
- The lived experience or of persons with barriers to accessibility could serve as a benchmark for accessibility excellence

- Just as accessibility means something different to every individual, so the criteria for accessibility could be defined by individual needs
- A holistic approach (for example, the age-friendly template) would speak to all customers and service users
- Communicating individual and industry success stories will be critical
- There are many existing recognition-based programs that, while not certification, could provide templates for a hybrid model
- A key part of implementation would be the clear communication and marketing of the benefits of universal accessibility and the business case for certification

### **Points for Further Dialogue**

While participants broadly agreed on the above points as foundational considerations, Phase 2 working groups could further discuss and find consensus on the below points. Participants put particular importance on implementation: how can we ensure the design process is thoughtful and inclusive and results in a sustainable model.

- How can certification complement but remain distinct from compliance with the law?
- Is it feasible to implement a model that encompasses all sectors and challenges?
  - If the model starts with one functional area or one type of disability, how do we choose where to start? How do we account for the areas initially excluded?
- Will education and individual success stories or economic arguments make for more compelling marketing? How best to brand accessibility in order to motivate change?

**“Let’s look at a model of abundance where what determines the reward for the business is the customer to business relationship, or that discussion. We have models out there that...will recognize the diversity of needs within the community.”**

**“Certification credibility can only be valued according to the procurement requirements and perceptions of prospective consumers. The quality of certification has two aspects for consideration; first, the organization that delivers the skill training, and second the ability of the certificate holder to demonstrate level of experience and knowledge skills.”**

### **Key Takeaways for Designing the Model**

Participants agreed that the eventual goal of this process would be a voluntary, independent accessibility certification model that applies to different business types and sizes. Further discussion will determine whether this is feasible or whether the model should pilot in one area and grow to others.

## Next Steps

This report represents the views expressed over the course of Phase 1: in roundtable sessions (as validated by the roundtable participants), by teleconference, through online feedback, and in one on one discussions. This report appeared in draft form on [certifiedforaccess.ca](http://certifiedforaccess.ca) for a two week review and comment period. All input received has been considered and incorporated into this final report. We welcome you to continue commenting, critiquing, and offering thoughts as the process continues.

### Phase 2 (February – March 2016)

Phase 2 of the certification consultation process brings together five working groups to delve further into the key themes contained in this report. Working group members are people of all abilities, representing a broad range of accessibility advocates, business, and certification experts that expressed interest to the Certified for Access team. Members were assigned to working groups based on preference and area of expertise or experience. These working groups will meet three to five times each and will produce a brief report of their findings, based on the following two objectives:

- 1) To provide recommendations on how the assigned focus area will fit in an accessibility certification model.
- 2) To identify key considerations and risks associated with the assigned focus area.

### Closing the Challenge and Final Report (March – April 2016)

The certification model is intended to be independent and voluntary, to be delivered by a non-government third party. One intended outcome of this consultation is to encourage the emergence of leadership from an independent organization, a consortium of organizations and/or a joint venture of individuals to implement the third party certification model.

Based on the working group recommendations, organizations interested in leading the certification model will prepare a brief proposed model and plan implementation. This proposal will outline the organization's take on the working group recommendations and the capacity required to develop and lead a sustainable model. The intent is to provide the public the opportunity to respond to more substantial options for certification and to provide potential certifiers with more information on community needs and preferences.

Deloitte will facilitate an information session for potential certifying bodies near the end of Phase 2, with details to be confirmed over the course of Phase 2.

All proposed models from interested organizations will be posted to [certifiedforaccess.ca](http://certifiedforaccess.ca) for two weeks, during which time participants in the process and members of the public may weigh in and comment on the different options. At the end of

this period, Deloitte will prepare a report summarizing the feedback received and the community's preferences as to a potential lead certifier or certifiers.

## Note to the Reader

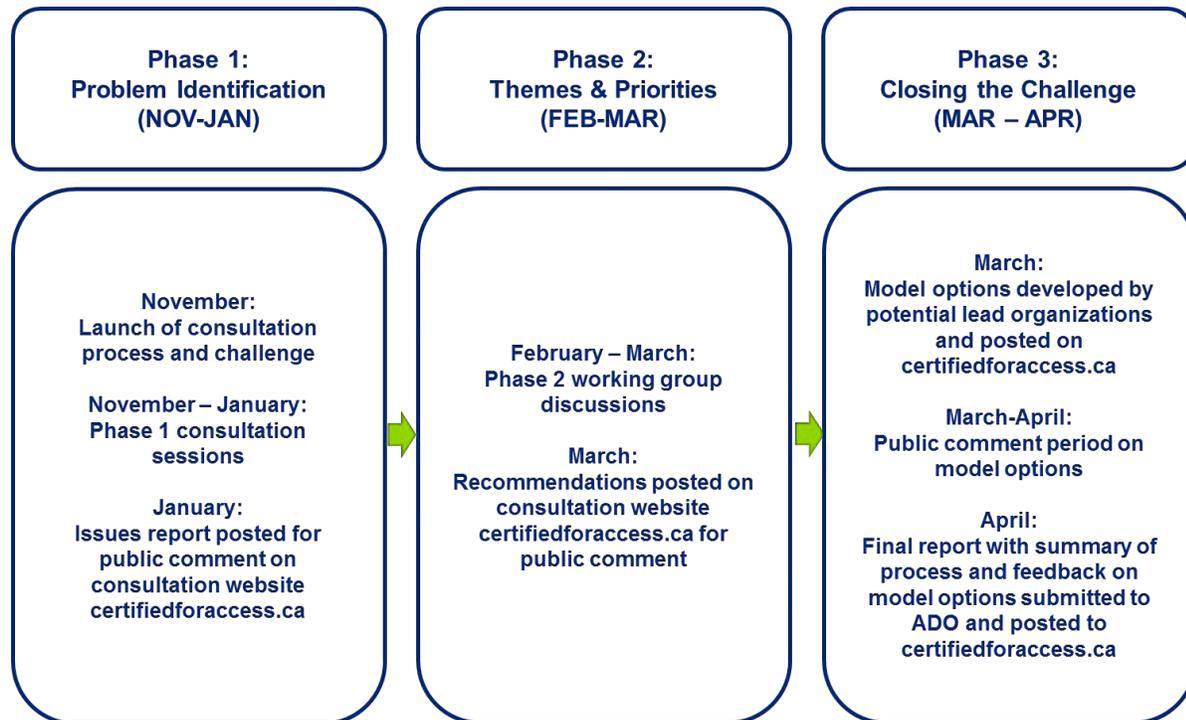
As mentioned, this process is voluntary, in its design, development, and implementation. By nature, it will rely at all phases on the experience, goodwill, and enthusiasm of a varied group of individuals and organizations. While we have tried to design each stage to consult in a variety of low-cost, efficient, and effective ways, we are aware of the barriers to participation for persons of all abilities given the cost and time required. We thank everyone who has contributed, whether in person, over the phone, or online. With input from over 120 individuals and organizations from a broad range of communities, we look forward to collaborating over the coming months and beyond in order to raise the bar on accessibility.

**“We always have to be aspirational...but we do have baselines we can work from. We have touchstones we can go to, get conversation to a certain level, and then talk about how aspirational we want to be. That doesn't have to be a today conversation, it can be over a longer period of time. We can continue to be aspirational and also find those milestones along the way.”**

## Appendix A - The Consultation and Reporting Process

The public consultation process will occur in four phases, as illustrated below:

Figure 1 - Project Phases



Deloitte will publish reports at each phase for public review and validation on [certifiedforaccess.ca](http://certifiedforaccess.ca). This report summarizes the Phase 1 discussion and will serve as the main tool for this stage of comment and confirmation. The document mirrors the three central objectives from this phase:

- 1) To capture key themes and discussion points from Phase 1 through in person sessions, online submissions, and teleconferences.
- 2) To encourage comment and input from participants and the public and validate project direction.
- 3) To set the context and foundations for Phase 2 discussions and for the eventual proposed certification model.

The contents of the final Phase 1 report have come from three contributing streams:

- 1) Three in person roundtable discussions, bringing together over 100 participants from the accessibility, business, and broader public sector communities to discuss the barriers, opportunities, and risks in developing a certification model
- 2) Engagement and feedback online via [certifiedforaccess.ca](http://certifiedforaccess.ca), Facebook, and Twitter

- 3) Teleconferences with over 30 individuals unable to attend in person sessions, including:
  - a. A teleconference with representatives of the Franco-Ontarian business and accessibility communities
  - b. A teleconference with the Self-Advocates Council of people with intellectual disabilities

For more information on the process and engagement opportunities or in order to access the discussion guides, background materials, and detailed discussion summaries from Phase 1, please visit our website and online engagement tool, [certifiedforaccess.ca](http://certifiedforaccess.ca).