

Independent 4th Review of the Accessibility for Ontarians with Disabilities Act (AODA)

Final Report

June 5, 2023

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Introduction: Declaring a Crisis

Frequently in my career I spend time with Ontario Government stakeholders in upper-floor offices, taking the elevator up some dozens of levels to rooms with commanding views of the cityscapes they govern. Years ago, while visiting one of these stakeholders there was a routine fire drill. Most employees orderly made their way to the stairs for the long descent. Others – those using wheelchairs and managing vision issues – instead made their way to what was, in essence, a closet. This was not to spare these people the hassle of using stairs for a fire drill. This was what they were told to do in a fire. Sit. Wait. Hope someone comes for you.

In the six years since that fire drill these remain typical emergency procedures. The Ontario government is aware of this problem – I have raised it personally in formal letters to two Ministers. For these reasons: the direct and tangible threat to the lives and well-being of a quarter of Ontario's population, combined with 17 years of missed opportunities under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), I, the Fourth Reviewer of the AODA, have no choice but to declare a crisis.

This crisis extends beyond immediate emergency response. More than 75% of surveyed Ontario residents in 2021 with a disability reported negative experiences.¹ 2.9 million people in Ontario currently have a disability.² Despite this, there has been minimal change in accessibility. This in turn means Ontario is forgoing a material, and growing, economic opportunity.

This crisis declaration is not intended as an assessment of accessibility in Ontario. This ground has already been well covered in past reviews of the AODA, as well as the Interim Report by the Fourth Reviewer.³ Instead, this crisis declaration is intended to be a necessary catalyst to get Ontario back on track for accessibility.

It is a near certainty that the goal of an accessible Ontario by 2025 will pass. That does not mean the next years of accessibility regulation, action, and enforcement are not critical. This crisis state, intended to last six months, will allow Ontario to accelerate key overdue processes to get accessibility right in the coming years. With this groundwork,

¹ IPSOS *Awareness & Attitudes Towards Accessibility 2021*.

² Disability estimates based on disability rates by age and gender categories as found on the *2017 Canadian Study on Disability* (see Stuart Morris, Gail Fawcett, Laurent Brisebois, and Jeffrey Hughes, [A demographic, employment, and income profile of Canadians with disabilities aged 15 years and over, 2017](#). Statistics Canada: 2018. These estimates are applied to reference growth projections for 2021 and 2040, as found in the Ontario Data Catalogue. [The Ontario Data Catalogue can be accessed here](#)

³ [The Interim Report of the Fourth Reviewer can be downloaded here](#)

Ontario will see major improvements in accessibility. Not just blue buttons at doors (that work), but major changes that allow the province to maximize the contributions of the 2.9 million Ontarians with a disability. These people are not statistics. They work. They pay taxes. They purchase goods and services. They vote.

After 17 years and three reviews, this Fourth Review recommends a profound shift in how accessibility is regulated and enforced in Ontario. In brief, the Fourth Reviewer strongly recommends shifting accessibility regulation of the private sector from provincial jurisdiction to federal, while leaving the provincial government accountable for ensuring the services, buildings and careers of the broader public sector in Ontario are accessible to all Ontarians. The reasons for this are outlined in the following sections.

This final report should not be read as an admonishment of the provincial government. This ground has been covered, and doing so, in itself, does not improve the experiences of the 2.9 million Ontarians living with disabilities. A key reason for releasing an interim report was to ensure that this final report can instead focus on concrete action the Ontario government can take to get its own house in order, fulfill its promises, and unlock the potential of millions of Ontarians.

Summary of Recommendations

This report outlines 3 categories of recommendations: immediate crisis recommendations, strategic recommendations intended to shift accessibility to new partners, and tactical recommendations that can make meaningful strides to improve accessibility while also retaining the ability to be integrated into strategic changes later.

Crisis recommendations are intended to solve immediate safety threats and to lay the necessary foundation for all other recommendations. Within 30 days of the tabling of this report, the province must form a Crisis Committee chaired by the Premier and co-chaired by the Secretary of Cabinet. This committee will be tasked with implementing 5 recommendation themes:

1. Emergency response
2. Service delivery and employee experience within the broader public sector
3. Creating a new Accessibility Agency to be elevated above the legislature
4. Creation of a preliminary action plan with corresponding success metrics
5. Develop initial actions for accessible government procurement

These crisis recommendations, or a detailed plan for their implementation, must be completed within 180 days of the formation of the Crisis Committee. These recommendations form the basis of the strategic and tactical recommendations that follow, and include key emergency procedures intended to save lives.

Strategic recommendations are those intended to shift the bulk of private sector accessibility regulation and enforcement to the Federal Government. The key reasons for this are twofold.

First, the *Accessible Canada Act (ACA)*, which pertains to federally regulated entities, creates a duplication of accessibility regimes in Ontario. Second, the province has often lacked resources to properly enforce the AODA, even for large organizations. This problem is compounded by the fact that there are 412,000 entities in Ontario subject to the AODA, 370,000 of which are small businesses. Ontario does not have the infrastructure to properly regulate this many entities for accessibility, and building such infrastructure is costly. However, federal agencies such as the Canada Revenue Agency (CRA) regularly collect information from, and audit, such small and medium enterprises (SMEs). With tweaks to budget and training, the CRA has the potential to audit and enforce accessibility in a far more cost-effective way than the provincial government.

Tactical recommendations are immediate actions the province can take following the conclusion of crisis recommendations. They can be pursued concurrently to the strategic

recommendations of federal integration. The majority of these recommendations would fall under the purview of a new Accessibility Agency, and thus ownership of activities would be more easily transferable once strategic recommendations are complete. This report includes 23 tactical recommendations centered around the following four themes:

1. Research
2. Tools and Mechanisms for Behavioural Change
3. Mobilizing Government Actions
4. Built Environment

The vast majority of recommendations are designed to be completed within the next three years. The reason for the short timeframe is simple: the recommendations provided by the 4th Review are not centered on standards, but on process. While standards may be one viable tool to attain the goal of an accessible Ontario, they cannot be the only tool. Only by creating repeatable and measurable processes – centered on understanding, measuring and improving experiences of People with Disabilities (PWD) – can Ontario (or any jurisdiction) reach its accessibility goals.

Disability in Ontario

People with Disabilities (PWD) are one of the largest population categories in Ontario. Approximately 2.9 million Ontarians aged 15+ currently have one or more disabilities. By 2040 this number will increase by another one million.⁴ The majority of these functional disabilities are also not visible.

The sheer size of the population with disabilities means that PWD are everywhere: as consumers, employees, friends, and family. It is likely that every person in Ontario knows a PWD. Probably more.

Despite this, PWD regularly face discrimination. This takes two main forms: attitudes of individuals; and conscious design decisions that exclude PWD from activities, services, and structures. These activities include career progression, education, and health care.

To address the discrimination faced by PWD, in 2005 the Ontario government passed the Accessibility for Ontarians with Disabilities Act (AODA). Its purpose is to develop, implement, and enforce accessibility standards to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises. The target for completion of these goals is January 1, 2025.

Despite these goals, the progress of the AODA has been, to borrow the words of the Third Reviewer, the late David Onley, glacial. Each review of the AODA has commented on its lack of progress. As at June 2023, the goal of an accessible Ontario for 2025 is difficult to achieve. Over the course of 15 months, the Reviewer consistently heard stories of frustration, both from PWD and AODA stakeholders.⁵

These experiences underscore the motivation for the 4th Review of the AODA: *The current experience for many people with disabilities in Ontario is poor. This stems from design flaws in services, products, technology, buildings, infrastructure, careers, processes, and human imagination.*

⁴ Disability estimates based on disability rates by age and gender categories as found on the *2017 Canadian Study on Disability* (see Stuart Morris, Gail Fawcett, Laurent Brisebois, and Jeffrey Hughes, [A demographic, employment, and income profile of Canadians with disabilities aged 15 years and over, 2017](#). Statistics Canada: 2018. These estimates are applied to reference growth projections for 2021 and 2040, as found in the Ontario Data Catalogue. [The Ontario Data Catalogue can be accessed here](#)

⁵ For a longer discussion of the current state of accessibility in Ontario, [please refer to the Interim Report](#)

Process of the 4th Review of the AODA

The key focus of this 4th Review of the AODA has been data and outcomes. Both are rooted in experiences and demands. Not just the experiences of PWD, but also the experiences of AODA stakeholders that must follow and/or enforce the legislation. This experiential focus differs from previous reviews, which have focused on defining disability, creating or expanding accessibility standards, and complying with/enforcing these standards. There were three reasons for this decision:

1. PWD do not demand standards or definitions, they demand positive experiences similar to that of the rest of the population.
2. Grounding assessments in experience prevents viewing accessibility as “checking a box” tied to standards
3. Definitions tied to identities like disability are fluid. An experiential focus elevates assessment and action above attempts to expand or narrow categories. This is consistent with the goal of an accessible Ontario for all.

This shift from a sole reliance on standards, and towards data-driven experience, differs from past AODA Reviews. This is intentional. To advance a stalled agenda, it is necessary to adopt new principles centered in emerging best practices. The six principles embedded in the Fourth Review of the AODA are:

1. Focus on execution: ensuring that final recommendations address actionable ways to drive immediate change.
2. Not tethered to past Reviews: use a comprehensive approach that reflects recent innovative thinking.
3. More than compliance: a focus on what will work to create a barrier-free environment, not just checking a box.
4. Grounded in lived experience: continuously seeking and embedding real world PWD experiences to prioritize change and evaluate success
5. Considering multi-year implications: develop recommendations focused on both 2025 deadline and continuous improvement objectives.
6. Evidence-based data-centric approach: apply credible data to form an evidence-based approach for assessments and recommendations

Consistent with this evidence-centric approach, the Reviewer conducted interviews with over 100 AODA stakeholders and disability experts, convened 4 virtual public town halls with over 300 participants, and conducted two surveys of 250 business leaders and 400 PWD. These, combined with the Reviewer’s 15 years of experience working in the disability market, have formed the basis of the recommendations of this final report.

This Review process has not been adequate to address the complexity of making Ontario accessible. The Reviewer notes that adjusting for accessibility in one large organization is a series of difficult tasks requiring all manners of economics, organizational change, risk management, process development and sourcing adequate funding. Any attempt to adjust the behaviours of Ontario's broader public sector and its 412,000 businesses must be viewed as a challenge beyond taking humans to Mars. Complex. Multi-faceted. A worthy, yet gargantuan lift requiring deep knowledge of the factors affecting policies and their resulting processes.

Perhaps a microcosm of the AODA itself, the 4th Review has a team of 3 people and a budget of less than \$500,000. To get to Mars. The AODA has a 17-year history of under resourcing and failing to put the best minds of our generation to tackle an epic societal challenge: full participation of people with disabilities in our economy and society.

Society has decided to tackle this problem. Let us, finally, do it properly.

Summary of Interim Report: The State of Accessibility in Ontario

It is the assessment of the 4th Reviewer that at present the AODA can only be described as a failure. After 17 years, the Reviewer has heard stories of missed opportunities and stalled progress – from both PWD and those AODA stakeholders responsible for implementing or complying with the regulation.

The Reviewer has identified 5 key themes from consultation feedback during this review as to why the AODA is currently a missed opportunity. These themes are:

1. Outcomes are poor: There is a near unanimous consensus that the AODA is currently failing People with Disabilities. Experience design does not consider the functional needs of PWD and thus PWD receive poorer experiences than their peers – including in health care and education. Senior business and government leaders told the Reviewer that changing behaviours to incorporate disability is not a priority.
2. Enforcement does not exist: There is no meaningful enforcement of the AODA. There are significant logistical constraints to enforcement. The entire Compliance and Enforcement Branch of the AODA has approximately 25 staff. This staff is responsible for the management, policy, administration, and enforcement of legislation that pertains to 412,000 private sector organizations.
3. Data/research does not exist: AODA stakeholders consistently indicated a lack of data was a significant problem in improving the experiences of PWD. Concerns

were raised that the Ministry for Seniors and Accessibility were not experts on disability by an individual with significant insight on these issues. The Reviewer considers the lack of data to be the single biggest missed opportunity over the 17 years of the AODA.

4. Basic leadership does not exist: Stakeholders observed there was a lack of urgency on getting accessibility right within the Ontario government. Leadership has been further hampered by legislative and senior staff turnover.
5. Nobody owns outcomes/no accountability: Tied closely to leadership and enforcement, consultation participants indicated there was a lack of accountability for implementing the AODA within both the private and public sector. This lack of accountability is compounded by lack of public knowledge, which makes it difficult to hold organizations to account.

From these consultation themes, the Reviewer provided five categories of assessments. These assessments are summarized below. A full explanation can be [found in the Interim Report of the 4th Reviewer](#).

1. Outcomes: Outcomes under the AODA have been poor. The underlying causes are a lack of data that has led to an overreliance on standards; and a lack of enforcement or incentives to comply with regulation. Too often, standards ignore the lived experiences of PWD and fail to identify cost-effective solutions to maximize impact. A lack of incentives – penalties for non-compliance or financial incentives for getting accessibility right – means accessibility is frequently ignored in planning decisions. This lack of positive incentives too is a symptom of a lack of data.
2. Government and Governance: There are two governance issues that prevent the AODA from operating as intended. First is a lack of a “north star” or positive role model for organizations to emulate. This role can and should be played by the Ontario government. Second is a lack of harmonization across accessibility regimes that leads to inefficient and confusing processes. One critical area of harmonization is with the *Accessible Canada Act*.
3. Leadership: Leadership has been absent on this file for 17 years. The reason for this is a lack of incentive for political leaders to prioritize it. This responsibility rests with a combination of the Ontario government, who is obligated to serve the needs of the 22% of Ontarians with a disability; but also the media and political opposition, whose role is to hold the government to account.
4. Accountability: Leadership requires accountability. Yet at present there is no accountability on this file. A key driver of this issue is lack of data, which prevents

transparency and accurate tracking of progress. One needs only to compare data on disability over the course of the AODA with provincial tracking of Covid-19 via public dashboards to appreciate the lack of public accountability mechanisms. It should be noted the Federal Government has started its own journey of data collection about disability in Canada.

5. Built Environment: It is the assessment of the 4th Reviewer that accessibility as it pertains to built environments should be treated separately from other accessibility priorities. Costs associated with changes to built environments have been a reason not to advance accessibility in general. These costs are real, and failure to address them is a significant risk. The *Accessible Canada Act*, requires federally regulated entities to remove barriers in their operations, including built environments. Soon entities such as banks will be required to have accessible real estate – and no later than 2040. They hold or lease thousands of retail locations across the province, and will be forced to abandon these should remediations not occur. Addressing this issue will take additional resources and strategies beyond that of other AODA areas.

What We've Heard Since

Since the publication of the Interim Report, the 4th Reviewer has continued to hold consultations with AODA stakeholders, especially those within the Ontario Government. The Reviewer has noted that Assistant Deputy Ministers (ADMs) have been more active in their engagements with the Reviewer since the release of the Interim Report. This reflects the importance of the file. This is a positive development.

The Reviewer would also like to highlight that the Ontario Government is currently spending approximately \$160 million on the remediation of Ontario Government buildings. This is a positive and necessary step. However, the Reviewer is obliged to report that this spending is likely insufficient to cover the full remediation needs of the province. The Reviewer addresses these concerns with a series of Built Environment Recommendations.

While a theme in the Interim Report, it is also increasingly clear that there is little to no research on disability as a market segment in Ontario. Instead, information is derived from a series of often ad hoc advisory committees of PWD, both to elicit feedback in general, and to inform the development of new disability standards. It is also clear that this approach, while almost always involving PWD, rarely centers on everyday lived experiences. The reason for this is relatively simple: advisory committees are rarely composed of “typical” PWD users of a given service or experience. Because of this, the

advice of advisory committees does not center the way in which a “typical” PWD user navigates an environment. This is not a rebuke of those on advisory committees. It is an observation that advocates view problems differently than the average user.

An additional theme that was touched on in the Interim Report, and is increasingly obvious, is that official government opposition – that in the Legislature – has yet to attempt to hold the government to account on accessibility. Given that disability represents approximately 22% of the voting age population, this is a clear failure. It should also be noted this failure is consistent across opposition parties for 17 years. The Reviewer extended multiple invitations to Members of Provincial Parliament representing both opposition parties to discuss accessibility. The Reviewer has yet to receive a response to these requests. The Reviewer considers this lack of response insulting to 2.9 million Ontarians with disabilities. It appears that Queen’s Park harbours many politicians who are willfully oblivious to a quarter of their constituents.

As part of the Reviewer’s role, he interacts with members of the media upon request for transparency and as public education. In the course of these media requests, one national broadcast media outlet requested the Reviewer be interviewed regarding the interim report. After a preliminary interview, the producer informed the Reviewer that their supervisor had concerns about the Reviewer’s voice, suggesting they reduce the interview to a 5-minute pre-recorded session from a 45-minute live show (the Reviewer has a unique accent caused by his disability). After pointing out the irony of the request and politely suggesting the producer’s supervisor remove their head from their body cavity, the Reviewer declined the invitation. While the supervisor changed their mind after conferring with colleagues, this anecdote illustrates the outright discrimination that people with disabilities face every day. Even those that are tasked with reviewing accessibility regulations. The media plays a key role in holding government accountable in a democratic society. The media is failing people with disabilities by excluding voices (literally and figuratively) and tending to cover disability as “inspirational” public interest content or as The Honourable David Onley once described as “water-skiing squirrel” stories. The media must do better for 25%+ of its audience.

Full Recommendations of the 4th Reviewer

This section outlines the full recommendations of the 4th Reviewer. These recommendations are organized into three categories: crisis, strategic, and tactical. Crisis recommendations must be resolved within 180 days, and are intended to address immediate threats to public safety, and to lay the necessary groundwork for a successful accessibility regime that has been absent for 17 years. These recommendations are to

be overseen by a special Crisis Committee. Strategic recommendations are those pertaining to shifting accessibility regulation of the private sector to the Federal Government. Tactical recommendations are intended to build on the foundations laid by the Crisis Committee, make immediate tangible improvements to accessibility regimes in Ontario, and ensuring these improvements are sustainable while strategic recommendations are being acted upon.

Crisis Recommendations

As noted in the opening of this report, the 4th Reviewer declares the current state of accessibility to be a crisis. Within 30 days of the tabling of this report, the province of Ontario must form a Crisis Committee chaired by the Premier and co-chaired by the Secretary of Cabinet. Within 30 days of the formation of the Crisis Committee, said committee must communicate its ability to take action on the crisis recommendations. All crisis recommendations are intended to be actioned within 180 days of the formation of the Crisis Committee. If any actions will take longer than 180 days, the Crisis Committee must provide publicly explicit reasons as to why this is the case within this 180 day window. All crisis recommendations are to be owned by the Crisis Committee until implementation, and accountability will rest with the Premier and Secretary of Cabinet.

Crisis Recommendation 1: Implement Emergency Response Protocols

Context:

At present, emergency procedures for People with Disabilities that manage limited vision or mobility often consist of sheltering in place. Given the lack of accessibility of many buildings and the shutting down of lifts during emergencies, there is often no way for some PWD to safely evacuate a building. In addition, communication during emergencies fails to account for the life-critical needs of those that manage hearing and/or cognitive/neurodiverse issues. This represents an immediate and acute risk to a significant number of Ontarians that has remained unaddressed. Moreover, it is clear that there is no standard for the safety of PWD that can be easily emulated, leading to a system in which there is a general unawareness of best practices, uneven access to lifesaving process and equipment, and lack of knowledge for how to improve this situation.

Actions:

- i. The Crisis Committee must establish clear, consistent emergency response protocols for all provincial government buildings that include the immediate, safe evacuation of all individuals within the building regardless of their mobility, vision, or any other functional difference that individual may have. This will alleviate the immediate risk to wellbeing in all provincially operated buildings.

- ii. The Ontario government, via the Crisis Committee, must publicly publish its emergency procedure plans integrating PWD. This will provide an example of best practices for other organizations to follow, and provide a potential catalyst for change. At present there is a lack of knowledge of accessible emergency procedures. There is material opportunity for leadership on this issue.
- iii. The Ontario government, via the Crisis Committee, must table legislation that all places of employment develop an emergency response plan that includes PWD within 180 days of implementation. While requirements for such procedures are embedded into accessibility standards, lack of enforcement has meant these standards are rarely followed. Organizations, especially small and medium enterprises, also often lack knowledge on how to do this properly. Combined with the publication of provincial emergency plans, this will alleviate a significant public safety concern.
- iv. Alongside legislation, the Crisis Committee must develop a plan for oversight of emergency response plans in the broader public sector and the private sector to ensure compliance. Compliance has been difficult to achieve via AODA. It is essential for emergency procedures.

Timeline and Success Metrics:

- i. Publish government evacuation plans publicly within 180 days of Crisis Committee formation.
- ii. Alongside emergency procedure plans, publish a supporting document outlining the process of ensuring successful execution of emergency procedures, as well as known gaps in the process that were identified in the creation of emergency procedure plans for public buildings
- iii. All Ontario employers develop an emergency response plan within 180 days of the passing of related legislation.

Crisis Recommendation 2: Focus Deputy Ministers (DMs) on service delivery and employee experience

Context:

As per the Interim Report, an overreliance on standards derived from input from advisory committees has created a situation in which the lived experiences of everyday PWD are ignored, both in accessing government services and as employed government workers. Given that PWD represent roughly a quarter of Ontario's population, a standards-based approach is not sufficient, nor is one predicated on raising awareness.

Virtually everyone in Ontario knows at least one PWD. It should be noted for service delivery, the highest touch areas are likely health care and education. Ergo, these areas deserve enhanced attention for both the number of individuals they serve, and the critical nature of their services.

Action:

- i. The Crisis Committee must issue a directive to all Deputy Ministers to identify barriers in customer (public) and employee experiences within their respective Ministry and its services. To identify such barriers, DMs must engage in material consultations with PWD, both as customers and employees. For clarity's sake, "material" is intended to refer to a statistically relevant sample size of the population served by a given business unit.
- ii. The Crisis Committee must issue a directive to all Deputy Ministers that they must publish the barriers identified during consultations, as well as a plan to remove these barriers. This plan will have a three-year timeframe, after which a new plan must be developed. It should be noted that both actions within this recommendation mirror the requirements of federally regulated entities under the *Accessible Canada Act* (ACA), and as such, there is a repository of best practices on which to draw upon. Like ACA plans, each should include a mechanism to anonymously provide feedback.

Timeline and Success Metrics:

- i. Written directives are to be received by all DMs within 180 days of Crisis Committee forming
- ii. Within 180 days of receiving said directives, each DM must submit their plan to uncover barriers
- iii. Within one year of receiving directives, each DM must provide a report of key barriers faced by both customers and employees within their respective Ministry and its services, as well as the steps that will be taken to remove these barriers. These plans must be made public, in a variety of formats, to maximize transparency

Crisis Recommendation 3: Create a new agency to elevate AODA delivery above legislature

Context:

At present there is no body that has demonstrated success in enforcing accessibility standards and regulation on to the provincial government itself. Due to this lack of

accountability, disability has rarely been a priority within the Ontario government. This has downstream effects: unless government can lead on this file, it is unreasonable to expect others to do so. Moreover, there is a lack of centralized resources to tackle accessibility challenges within government. These resources are not just financial: the largest current resource gap is reliable information. The Reviewer found that Ministries often work in “silos” in developing their own accessibility initiatives, meaning there is no repository of best practices or opportunity for inter-organizational learning. An agency dedicated to accessibility can alleviate these coordination problems.

Action:

- i. Develop a framework for the creation of a new Accessibility Agency. This agency would be tasked with leading and coordinating provincial and municipal accessibility activities, many of which are outlined in the tactical recommendations. The agency would also be responsible for the oversight of AODA recommendations; maintain control of processes; conduct research; create, analyze and distribute data; provide consultation to relevant stakeholders; and broader public sector enforcement. Many of these correspond with other recommendations in this report. To underscore its importance, it is recommended this agency report into either the Ministry of Economic Development, Job Creation, and Trade or the Ministry of Public and Business Service Delivery. Both capture missed opportunities in private sector growth and government services, respectively. The creation of such an agency allows for more independent, flexible, direct action and follows other key government priorities such as infrastructure. This will improve accountability.
- ii. Develop list of funding sources for the new Accessibility Agency

Timeline and Success Metrics:

- i. Plan for the creation of new agency published within 180 days of the formation of the Crisis Committee
- ii. Creation of fully funded Accessibility Agency within one year of announced plan
- iii. All AODA and major accessibility initiatives moved under purview of new agency within 180 days of its inception

Crisis Recommendation 4: Develop Success Metrics and New Action Plan

Context:

There are currently no clear metrics as to what success looks like in accessibility, apart from adherence to an ever-shifting landscape of standards and definitions. This lack of metrics has made accountability difficult to achieve, not only for the Ontario government, but also for Ontario's private sector who are seeking a clear "north star" to emulate. This lack of clear success is striking given the stated goal of an accessible Ontario by 2025. Without a clear action plan 2030, much less 2025, is unattainable.

Action:

- i. Assign the Secretary of Cabinet as the owner accountable for Ontario's accessibility action plan over the next 5 years. This owner should have a close working relationship with the head of the new Accessibility Agency.
- ii. Define and publicly communicate clear success metrics embedded within a multiyear accessibility plan for which progress is tracked and publicly communicated. This will likely be an aggregated form of the individual Ministry accessibility plans, combined with goals for the private sector and municipalities. Success metrics must be tied to economic and PWD experience goals, not simply the meeting of standards, to provide positive incentives for private sector entities to comply with the AODA and preferably exceed it. This is especially important for small businesses for whom the AODA is largely viewed as a pure compliance cost.
- iii. Provide a budget for each accessibility plan action item that does not fall within the budgetary purview of individual Ministries.

Timelines and Success Metrics

- i. Owner for new accessibility action plan identified and put in place within 30 days of Crisis Committee formation
- ii. Working with their team, owner of accessibility plan must publish preliminary success criteria within 180 days of being assigned to their position
- iii. First provincial action plan must be published within one year of publication of preliminary success criteria, coinciding with plans of individual Ministries

Crisis Recommendation 5: Accessible Procurement

Context:

Accessibility gaps frequently occur when organizations source products and services from third party vendors that fall short of their own stated accessibility standards. This problem is especially acute for smaller organizations, who lack the purchasing power to leverage vendors to include built in accessibility features at a feasible price point. Large organizations such as governments have the purchasing power to shift incentive for third party vendors to ensure product accessibility, creating downstream benefits for all. It should be noted the Federal Government leverages its purchasing power in this way, creating the potential for collaboration to improve accessibility in frequently sourced third-party systems such as digital hardware and software.

Action

- i. Assign owner to audit provincial procurement processes. This auditor must have the resources to coordinate their activities across Ministries. For this reason, the auditor should be based in the new Accessibility Agency
- ii. Develop a plan to audit accessibility in systems procured by the Ontario government, prioritizing those used by the largest number of people. This process should also prioritize systems frequently used in the private sector, especially by small and medium enterprises who lack the purchasing power to leverage accessible procurement at favourable price points
- iii. Through the accessibility audit, identify and remove accessibility gaps within the procurement process itself, coordinating with Ministries on their individual accessibility plans. Combined with the procurement of accessible goods, this will create a fully accessible public procurement process end-to-end. Published alongside Ministry plans, this will provide a series of best practices for private sector emulation, which will combine with leveraged procurement from the provincial and/or Federal Government (see below) to increase accessibility in Ontario
- iv. Open discussions with the Federal Government to combine purchasing power in procurement agreements. This will provide further purchasing leverage on commonly sourced systems to ensure they are fully accessible. By allowing the government to procure accessible systems, these systems will become available at better price points for smaller enterprises throughout Ontario

- v. Issue a mandate that Supply Chain Ontario must only procure accessible products and services after January 1, 2025. Any exception must be approved by the Premier and published for public consumption.

Timeline and Success Metrics

- i. Audit ownership to be assigned within 180 days of the creation of the new Accessibility Agency
- ii. A full audit of the five most procured systems, measured in terms of number of users, should be completed within the first year of audit following assignment of ownership
- iii. Talks of coordinating procurement should commence within 30 days of the formation of the Crisis Committee
- iv. Mandate to Supply Chain Ontario published within 180 days of the formation of the Crisis Committee
- v. The province should set a goal of coordinated procurement with the Federal Government within two years
- vi. Within three years of tabling this report accessibility is fully integrated into all Ontario government procurement practices

Strategic Recommendations

After 17 years of inaction, a different approach to accessibility is required. This is true not just within Ontario, but across Canada. The Federal Government has begun to act more decisively in the disability market with the passing of the *Accessible Canada Act*. This requires that all crown corporations, Federal Government entities, and federally regulated organizations publish public accessibility plans outlining key barriers and how they will be removed, in consultation with People with Disabilities, every three years. They must also produce annual progress reports.

Readers of these recommendations will note that these criteria and timelines align with those required of the individual Ministry plans as per Crisis Recommendations. This is intentional. The surest path to an accessible Ontario is to harmonize provincial efforts with federal ones, leveraging the financial, logistical, and knowledge advantages of the Federal Government in this space. It is this insight that drives the 4th Reviewer's two strategic recommendations which aim to federalize accessibility in the private sector while enabling the Ontario Government to set its own specific internal priorities for the broader public sector. The Reviewer also notes the opportunity for the provision of access to federal funding to provinces for accessibility, provided the provinces meet to be considered pre-established quality standards. These recommendations are detailed below.

Given the scope of strategic recommendations, these must be owned by a combination of the Premier's Office and Cabinet. The new Accessibility Agency can play a supporting role in this process.

Strategic Recommendation 1: Shift private sector regulation to Federal Government. Ontario to retain regulation of, and focus on, broader public sector.

Context

There is currently a duplication of accessibility regimes in Ontario that affect some of the province's largest private sector employers with operations in multiple provinces such as large retailers, large manufacturers, financial institutions and telecommunications providers. These two accessibility regimes are the *Accessible Canada Act* and the melange of provincial accessibility regimes. Of the two, the ACA has far more robust reporting requirements and enforcement mechanisms, making it a more useful regulatory platform to drive results.

Enforcement is non-existent under the AODA, due to a combination of lack of resources and the size of the private sector that falls under the jurisdiction of this legislation. There are 370,000 small businesses in Ontario, which creates a logistical enforcement issue unless an agency is already collecting data on each of these enterprises.

As of December 2021, there were 1.21 million employer businesses in Canada. Of these, 1.19 million (97.9%) were small businesses, 22,700 (1.9%) were medium-sized businesses, and 2,868 (0.2%) were large businesses.⁶ Ontario hosts 32% of Canada's small businesses. This represents the largest regulatory burden, by province, in the country.

The Federal Government has tools that can be utilized to solve the logistical hurdle of regulating Ontario's 380,000 small businesses. The Canada Revenue Agency (CRA) routinely collects information from, and audits small and medium businesses across Ontario, making it an ideal partner to enforce the accessibility legislation currently under the AODA. While such a transition would require additional training and resources within the CRA, it is a more efficient means of enforcing accessibility than what currently occurs in Ontario, and while outside the scope of the Reviewer's mandate, opens an avenue to extend such accessibility legislation across the country.

An additional advantage of shifting private sector regulation to the Federal Government is that it is farther along in building the regulatory structure and data gathering process in disability than the Ontario Government. Alongside the ACA, the Federal Government has launched funding for numerous disability research projects that can be leveraged to provide more informed auditing and advice to both the private and public sectors. It is a more efficient use of resources to leverage these data collection processes than to develop them independently of and redundantly to the Federal government.

Finally, the financial resource advantage of the Federal Government makes it a natural candidate to be responsible for accessibility regulation. Not only can it commit additional resources to fund research and audit results, but its greater borrowing power also means it is in a better position to retain risk for capital intensive actions such as systemic remediation of assets for accessibility (see also Crisis Recommendation 5).

Action

- i. Initiate a conversation with Federal Government partners as to the feasibility and potential timelines of transferring private sector accessibility regulation and its enforcement from the provincial to federal level
- ii. Following agreement with the Federal Government, Ontario is to transfer the regulation, enforcement and legislative authority surrounding private sector accessibility to the Federal Government

⁶ Government of Canada 2022. [Key Small Business Statistics 2022](#). Note that these numbers follow the Statistics Canada definition of small and medium-sized businesses, rather than that of the AODA, which defines a large business as any with 50 or more employees.

- iii. Following the transfer of authority, the current AODA enforcement and research body – the new Accessibility Agency – becomes a provincial resource to assist in implementing and enforcing broader public sector accessibility changes
- iv. Public sector regulation, enforcement and legislation remains under provincial control, with tied federal funding to ensure completion and maintain quality standards

Timelines and Success Metrics

- i. Ontario government initiates discussions with Federal Government within 180 days of the tabling of this report
- ii. Within one year of tabling of this report, create priority areas in which to transfer jurisdiction to the Federal Government
- iii. The Ontario government is to transfer the enforcement and legislative authority of the private sector to the Federal Government within three years of the creation of priority areas
- iv. Within three years of the transfer of enforcement and legislative authority, the Canada Revenue Agency becomes responsible for auditing Ontario SMEs for accessibility

Strategic Recommendation 2: While Federal Government is to own laws, standards, and regulations, Ontario maintains control over accessibility regulation of Ontario's broader public sector, under the AODA. The Federal and Ontario governments to coordinate on quality standards tied to funding.

Context

As per above, the current regulatory environment surrounding accessibility in Ontario is inefficient and ineffective. Governments outside Canada that have implemented accessibility legislation rely on a more centralized model. The Reviewer contends that one unified centralized approach is more effective and efficient for all parties implementing regulations.

Action

- i. Alongside federal partners, develop a set of quality standards that all broader public sector entities must meet to be compliant with accessibility regulation
- ii. Develop a funding model with federal partners to attain and maintain accessibility in the Ontario broader public sector, in accordance with previously established quality standards. Funding is to be tied to adherence with these standards. It is the recommendation of the 4th Reviewer that the

Federal Government provide 50% of costs of remediating public sector buildings and digital holdings if quality standards are met. For clarity, quality standards may exceed building codes and accessibility standards. Quality standards should be directly linked to an intended experience for people with disabilities.

Timelines and Success Metrics

- i. Development of set of quality standards within one year of accepted transfer of authority to Federal Government. These standards must be grounded in data and experience (see Tactical Recommendations)
- ii. Funding model established within one year of agreement of quality standards
- iii. Long term: Ontario becomes "north star" of provincial accessibility that other provinces seek to emulate within a national accessibility regulatory framework

Tactical Recommendations

Tactical recommendations are intended to build on the foundation created by the Crisis Recommendations to create a sustainable accessibility regime in Ontario. To create such sustainable change, these tactical recommendations emphasize data collection, data analysis, information dissemination, behavioural change mechanisms, and government action. The 4th Reviewer also includes a section specific to the built environment, following the assessment that this area should be treated separately from other accessibility initiatives given its future risk and high financial cost.

It should be noted that while these recommendations build on the Crisis Recommendations, they may operate independently of the Strategic Recommendations. All data and change mechanisms recommended in this section, the majority of which would be owned by the new Accessibility Agency, can be shared with federal partners depending on the progress of the Strategic Recommendations. These recommendations will significantly improve the bedrock on which accessibility regulation and enforcement is based in Ontario irrespective of the progress made on the Strategic Recommendations.

Tactical Recommendation Area 1: Data, Analytics, and Research

As has been noted in this report, and extensively in the Interim Report, data on disability and accessibility in Ontario is poor. This is not unique to Ontario. The Federal Government is only beginning its foray into actionable accessibility data. These recommendations are intended to create a robust quantitative and qualitative data collection, data analysis and information dissemination regime for Ontario.

Research Recommendation 1: Build team to collect, analyze, and publish disability research as a public asset

Context:

At present disability data is largely limited to the Federal Government, using blunt tools such as census data. There has been little effort to systematically collect information to understand the experiences of PWD. In these conditions, reliable data is poor, as no Agency or Ministry routinely seeks to collect, analyze and understand this data nor has a disability data and information strategy been developed.

Action:

- i. Identify and hire a data, analytics and research team lead. This individual will be a key member of the leadership team of the new Accessibility Agency.
- ii. Empower team lead to hire team of qualitative and quantitative data experts to collect and analyze experiences of PWD. This team should have mixed methods expertise and operate within the new Accessibility Agency. To be

- clear, the team should be research and experience (UX) experts first, and can learn disability through their research.
- iii. Reallocate and increase funding from current accessibility awareness campaigns to the research team. This research team serves a similar role of disseminating information, yet produces greater results by also conducting original research that can then be utilized by media and/or other interested parties.

Timelines and Success Metrics:

- i. Research lead appointed within 180 days of creation of the new Accessibility Agency
- ii. Budget for research team and initial six years of research sourced within 180 days of creation of the new Accessibility Agency
- iii. Initial research team hired within 180 days of hiring research lead
- iv. Publication of first research project within one year of hiring of full team. Publication of new public research quarterly, and continuously, including updates to past research

Issue owner:

- i. Head of the new Accessibility Agency to be responsible for hiring of research team lead
- ii. Crisis Committee to establish operating budget for the new Accessibility Agency, including research funding, for initial six years. Budget cycle must be longer than election cycle
- iii. Research lead within the new Accessibility Agency to be responsible for hiring research team and conducting and disseminating research findings

Research Recommendation 2: Build equitable representation and analysis of the disability population in publicly collected datasets to be used for decision-making and evaluation

Context:

Simply collecting disability data is insufficient to ensure an accessible Ontario. There is a need to ensure this data is not only an accurate representation of disability (i.e.: proportionately capturing disability “types” across social groups) but is also integrated into analysis across social issues. For example, disability data must be integrated into the analysis of housing, educational outcomes, and health care outcomes. This capacity for data capture and analysis must be in-house and not outsourced. Once collected, this data must form a basis for public policy decision making and evaluation, and should be

used to inform the activities of broader public sector organizations. This information should be a public asset to be used to inform the activities of private sector organizations. This research will also allow for the benchmarking of PWD experience.

Action:

- i. As part of research activities, the research team within the new Accessibility Agency must be tasked with building public datasets. These datasets should reflect known frequency of disability within the population, across age and disability type. It must include economic data such as income, employment and added cost to individuals driven by disability.
- ii. Data and analysis must be widely marketed to the public, the broader public sector and private sector shareholders for use in decision making
- iii. Data must be actively disseminated to the public in channels and formats that allow for easy consumption (see Research Recommendation 4).
- iv. Data is to be used for audits and public policy decisions by relevant policy stakeholders

Timelines and Success Metrics:

- i. Creation of first working dataset within two years of securing the new Accessibility Agency research funding
- ii. Publication of public dataset within three years of the new Accessibility Agency research funding
- iii. Recurring updates to dataset(s) every 90 days to reflect ongoing research
- iv. Mandated use of accessibility datasets within one year of publication for public policy decisions in all issue areas at provincial and municipal levels of government, as well as audits of public policy – starting with health, education, housing and transportation

Issue owner:

- i. The creation, curation, and analysis of datasets is the responsibility of the research lead within the new Accessibility Agency
- ii. The new Accessibility Agency is responsible for demonstrating relevance of public data for public policy making, and in specific issue areas, within one year of its publication
- iii. Individual stakeholders in the broader public sector are responsible for using this data in their design, evaluation, and auditing of public policy and service delivery, with the new Accessibility Agency research team providing a supporting role upon request

Research Recommendation 3: Direct coroner reports to record disability in order to measure relative mortality

Context:

One critical area of missing data pertains to life expectancy for PWD. Because disability is not captured in mortality demographics, this is a critical black box of information. Yet, it is likely that there are significant differences in life expectancy for PWD compared to the general population. First, disability is not well considered in emergency procedures, making accidental death more likely. Second, disability is more likely to coincide with co-morbidities for illnesses such as Covid-19. Finally, disability is more prevalent in other conditions likely to lead to higher mortality rates such as age and lifestyle.

Action:

- i. Ontario must direct coroner reports to include disability, including disability type, regardless if disability is related to cause of death
- ii. Coroner data must be shared with the new Accessibility Agency research team for integration into public datasets, with required consideration of the privacy of health care data

Timelines and Success Metrics:

- i. Ontario must direct coroners to record disability within one year of the tabling of this report
- ii. Disability should be integrated into mortality reporting within 180 days of provincial directive

Issue owner:

- i. The Ministry of the Solicitor General is responsible for directing coroners and ensuring disability is integrated into mortality reporting
- ii. The Ministry of Solicitor General must ensure this data is shared with the new Accessibility Agency research team
- iii. The new Accessibility Agency research team is responsible for integrating this data into public datasets

Research Recommendation 4: Develop a province-wide public disability dashboard

Context:

Accountability for progress under the AODA is low. A key reason for this is the lack of data and knowledge about the state of accessibility in Ontario. From a public education perspective, this has also led to disjointed and ad-hoc activities that rarely capture the

scale of disability in Ontario and the experience of PWD in any way, thus leading to wasted resources on educational opportunities.

To create accountability, media, opposition parties, and the public must be able to clearly track accessibility and accessibility progress in Ontario. This is the case for other states in the disability space, such as New Zealand, which has created a public disability dashboard that is easily consumed by all.

It should be noted that this public dashboard approach was recently adopted in Ontario for tracking Covid-19 data. At that time, this allowed for greater public debate and accountability. It was also an invaluable resource for the Ontario private sector for charting their course in an otherwise information poor environment.

Action:

- i. As part of the Data, Analytics and Research Team, identify lead specialized data and visualization analyst within the new Accessibility Agency research team to own public data presentation
- ii. Create a public dashboard with all quantitative accessibility data
- iii. Continued updating of dashboard to reflect new research and findings
- iv. Provide links on dashboard to further qualitative studies and reading

Timelines and Success Metrics:

- i. Hiring of data analyst responsible for public dashboard within 180 days of hiring research team lead
- ii. Launch of dashboard including first database results within 90 days of first dataset completion
- iii. Creation of qualitative research library within one year of dashboard launch

Issue owner:

- i. The public dashboard is to be owned by the new Accessibility Agency

Research Recommendation 5: Establish a panel with PWD to consult on priority issues impacting accessibility

Context:

A key principle in accessibility is “nothing for us without us.” In other words, that People with Disabilities must be consulted through the entirety of a product, service, or policy design cycle. This emphasis on experience is a major theme of the 4th Review of the AODA.

Too often, the principle of “nothing for us without us” has led to an emphasis on consulting advocacy organizations and/or “experts” rather than the main PWD users of a product, service, or experience. This has in turn led to an emphasis on standards rather than the processes PWD most frequently use when engaging with a given environment. It has also led to costly accessibility initiatives on systems that PWD almost never use.

Done properly, consulting with those with lived experience reduces the cost of targeted program delivery. An example is the UK Fulfilling Lives Programme, which funded local partnerships across 12 areas in England to address complex needs such as homelessness, mental illness, and substance abuse. This program saved more than £700 per person, per year in government services. Essential to this program was that its intended beneficiaries were engaged as users to co-produce program reports. This led to the abandonment of programs that actual users knew would be ineffective, saving significant resources.

Given the number of PWD in Ontario, building a significant panel of users to consult is not a difficult undertaking. Having these individuals available will provide a simple and direct source of consultations for government stakeholders, both for creating their own accessibility plans, and for the creation and evaluation of policy.

Action:

- i. Assemble panel of 100 PWD for initial consultation work. This panel should reflect the disability population in terms of disability type. These users should not be employed as activists or be members of advocacy organizations to ensure consultations capture ordinary users (advocates may be consulted at other stages of projects)
- ii. Make panel available across government stakeholders for consultations on accessibility plans, experience design and public policy
- iii. Continue to expand panel over time, with a goal of exceeding 1,000 users, with rotating membership
- iv. The new Accessibility Agency may wish to consult with advocacy groups and “experts” periodically as a confirmation and/or fact-finding exercise. This must not act as a replacement for robust user research

Timelines and Success Metrics:

- i. Assembly of initial panel of 100 users within one year of appointment of the new Accessibility Agency research team lead
- ii. Addition of 100 panelists/quarter, with a target of 1,000 PWD as “steady state” after two years

- iii. Consultation with PWD users for every service design, accessibility plan, legislative design or review, as needed, within 180 days of assembly of first panel
- iv. Creation of specific panels for health, education, and Ontario Public Service within two years
- v. Build and maintain specific panels for municipalities and/or groups of municipalities, within three years

Issue owner:

- i. The creation and maintenance of user panels is to be owned by the new Accessibility Agency
- ii. Public sector stakeholders are responsible for engaging these panels in consultation with the new Accessibility Agency

Research Recommendation 6: Define and update measurable outcomes for accessibility success, reflecting diverse stakeholder needs

Context:

A common theme that emerged when consulting private and public sector AODA stakeholders is that there is no clear idea as to what success looks like. This has led to either following the advice of advocacy organizations, or relying on externally generated standards, both of which materially ignore the experiences of core PWD users. A key task of the Crisis Committee is to establish a set of preliminary outcomes to inform the first year of accessibility planning (see Crisis Recommendations 2 and 4). These outcomes must continue to evolve as new data is collected. These outcomes must be multifaceted, targeting specific policy areas such as, but not limited to, employment experience within the broader public sector, health, and education. For reference, [see Phase 2 of the Review of the Information and Communications Standards – 2020 Final Recommendations Report](#). For clarity's sake, it is plausible that "audited adherence to Standard X" could be a measurable outcome. This assumes, of course, that adherence to Standard X reflects the actual intended experiences of users with disabilities.

Action:

- i. Develop clear metrics establishing the current state of accessibility in the public sector, emphasising health, education, and the Ontario Public Service
- ii. Establish clear target benchmarks that can be measured and tracked over time to ensure progress and accountability

Timelines and Success Metrics:

- i. Establishment of key metrics to be used to define current state of accessibility within one year of hiring research team in the new Accessibility Agency
- ii. Publication of “where we are” metrics across health, education, and Ontario Public Service within one year of definition of key metrics. This publication should include integration into the public dashboard (see Research Recommendation 4)
- iii. Continuous updating of metrics as new information becomes available, including new research and annual progress reports

Issue owner:

- i. The new Accessibility Agency is responsible for the creation of success metrics, in consultation with relevant public sector stakeholders
- ii. Broader public sector Ministries, departments and agencies are responsible for collecting and sharing internal data on their current state, using the new Accessibility Agency success metrics
- iii. The new Accessibility Agency is responsible for aggregating and disseminating current state of accessibility and track/publish progress over time

Research Recommendation 7: Develop public accessibility action plan and publicly share and track progress against previously identified milestones

Context:

Publicly available data and clear success metrics promote accountability. Accessibility action plans can only be successful if owners are held to account. A key element of improving accessibility is thus ensuring that plans, success metrics, and progress are made publicly available. It should be noted that it is already mandatory for many organizations to create public multiyear accessibility plans – the key needed differences are that these plans have annual public progress reports tied to milestones to ensure accountability, and critically, that the plans must extend beyond legalistic/boilerplate commitments to meet the experience needs of the public and of public sector employees. While provincial public sector entities must already meet these requirements, they must be made more robust in light of stalled progress on this file.

Action:

- i. The Ontario Government, municipalities and their respective Ministries, departments and Agencies must each publish an accessibility plan every three years, with progress reports every year (see Crisis Recommendation 2). These

- plans must be based on consultations with PWD, identify current barriers for both the public and employees in their interaction with the Ministry/Agency, and how the Ministry/Agency intends to remove those barriers over the life cycle of the plan. Note that this follows the structure of the *Accessible Canada Act*.
- ii. A new plan must be published for each Ministry, department and Agency every three years

Timelines and Success Metrics:

- i. Publication of an accessibility plan for each Ministry, department and Agency within two years of the tabling of these recommendations (see Crisis Recommendation 2).
- ii. Publication of success metrics, as defined by the new Accessibility Agency within one year of the public release of accessibility plans to be integrated into subsequent plan cycles
- iii. Publication and tracking of all broader public sector accessibility plans as part of the provincial accessibility dashboard within 180 days of integrating success metrics

Issue owner:

- i. Each government Ministry, department and Agency is responsible for their respective accessibility plan and progress report
- ii. The new Accessibility Agency is to play a support role, upon request, in the creation of accessibility plans
- iii. The new Accessibility Agency is responsible for aggregating Ontario accessibility plans and integrating into public dashboard

Research Recommendation 8: Develop public feedback mechanisms for accessibility across the broader public sector

Context:

The collection of data is not limited to specific studies conducted by the new Accessibility Agency. Particularly in the context of identifying accessibility barriers and obstacles to maximizing public and/or employee experiences with a Ministry, department or Agency, it is necessary to collect continuous stakeholder feedback. For this reason, it is essential that all Ministries/Departments/Agencies allow for the submission of anonymous feedback through a variety of channels. Moreover, given the lack of knowledge of government agencies, it is necessary that feedback be shared from where it is submitted to the correct stakeholder to allow proper aggregation and response (No Wrong Door).

Action:

- i. Each Ministry, department and Agency must provide multiple means of providing feedback related to accessibility in their area of operations, including employment. Feedback should be able to be provided via phone, email, or mail, at minimum. Feedback information should be easily available on the website of the Ministry, department or Agency, and also be within the 3-year Accessibility Plan (see Research Recommendation 7)
- ii. Each Ministry, Department or Agency must forward feedback that does not pertain to their organization but instead to an alternative Ministry, Department or Agency to the new Accessibility Agency
- iii. The new Accessibility Agency must organize feedback sent to the wrong Ministry or Agency and provide it to the relevant stakeholder
- iv. Feedback should inform Ministry and Agency progress reports and subsequent Accessibility Plans. They are not sufficient on their own to constitute consultations

Timelines and Success Metrics:

- i. Feedback mechanisms must be published alongside Accessibility Plans (see Research Recommendation 7)
- ii. The new Accessibility Agency must have a team in place to reallocate feedback prior to the publication deadline of provincial Accessibility Plans

Issue owner:

- i. Each Ministry, department and Agency is responsible for providing feedback mechanisms
- ii. The new Accessibility Agency is responsible for reallocating feedback as required and ensuring compliance with feedback obligations by Ministries, Departments and Agencies

Tactical Recommendation Area 2: Behavioural Change Tools and Mechanisms

For 17 years the AODA has created and nominally enforced standards as a way of changing behaviour in both the private and public sectors. The sole use of standards has failed. Alongside lack of consistent and meaningful enforcement, there have been few positive incentive-based mechanisms of change. This in turn has made organizations reluctant to increase accessibility for a misguided fear of high costs and low returns. Both the costs and returns must be addressed to create sustained behavioural change.

Behavioural Change Recommendation 1: Pilot accessibility funding initiatives including social impact bonds and customer fees

Context:

A crucial barrier in addressing accessibility concerns is cost, especially for small- and medium-sized enterprises, and for capital-intensive remediations such as those to built environments. This has led to inaction across accessibility. Without intervention, smaller organizations will be unable to meet their accessibility requirements, and large, federally regulated organizations may consider divesting certain assets if they must unilaterally bear the cost of meeting their accessibility requirements in built environments. This will in turn put downward pressure on some of the highest value corporate real estate in Ontario, thus creating a significant economic risk.

Action:

- i. Identify and vet investors that aspire to provide social impact bonds tied to accessibility
- ii. Create social impact bond pilot project that prioritizes high cost remediations such as those to built environments. Results of pilot project are to be aggregated by the new Accessibility Agency and publicly published
- iii. Conduct research on public response to small accessibility surcharges on identified government services. The model for this program would be airport improvement fees that can only be applied to remediations and improvements of current airport infrastructure.

Timelines and Success Metrics

- i. Plan for social impact bond developed, including process of vetting of potential investors, within one year of the new Accessibility Agency receiving full funding
- ii. Opening of application process for social impact bond pilot process within 180 days of plan development
- iii. Full evaluation report of pilot study within two years of launch, with subsequent publication
- iv. New Accessibility Agency to complete study of reaction to surcharges within two years of hiring internal research team

Issue Owner

- i. Social impact bond program to be developed and operated by the Ontario Financing Authority, in consultation with the new Accessibility Agency
- ii. Study of surcharges to be completed by the new Accessibility Agency

Behavioural Change Recommendation 2: Apply social influence tools to shift public conversations and underlying social norms about disability and accessibility

Context:

People with disabilities consistently indicate the most frequent barriers they encounter are attitudinal. Shifting attitudinal barriers is difficult to do through regulation. Instead, the Ontario Government should be seeking to shift norms underlying discussions of disability. Normative shifts require persuasion, especially on key potential first-movers that will push smaller players to follow. This will require a multifaceted approach including use of social platforms, understanding current norms, and identifying key messages and potential first-movers.

Action:

- i. Identify current norms and conversational trends surrounding issues of disability and accessibility in Ontario, emphasizing social platforms and mainstream media to maximize reach. The focus needs to be outside of advocacy groups
- ii. Identify potential first-movers that could be engaged to shift conversations on disability in Ontario
- iii. Craft potential messages to emphasize for first-movers, centering lived experiences and the messages themselves avoiding stereotypes
- iv. Create process to measure changes in conversations on disability on social platforms over time
- v. The Reviewer highly recommends engaging high-quality outside message consultants to assist in messaging. To date, Provincial communications teams have struggled to deliver compelling messages involving disability

Timelines and Success Metrics

- i. Audit of accessibility norms and conversations in Ontario context within one year of the new Accessibility Agency receiving full funding
- ii. Identification of key influencers within one year of the new Accessibility Agency receiving full funding
- iii. Crafting of targeted message points within 180 days of identification of key influencers
- iv. Launch of influence campaign leveraging and potentially funding influencers to spread identified messaging within two years of the new Accessibility Agency receiving full funding
- v. Quarterly analysis of influence campaign impact

Issue Owner

- i. The social influence campaign will be designed and operated by the new Accessibility Agency

Behavioural Change Recommendation 3: Partner with Ontario's tech leaders to explore low-cost technology solutions to identify leaders in space and build accountability

Context:

Given current regulatory challenges, it has been difficult to generate accountability within the private sector. Indeed, PWD have consistently indicated few improvements in accessibility in Ontario. Alongside this lack of accountability, there are no clear examples of who is doing this well. To mitigate this, there is the potential to use crowd-sourced review software to provide real time feedback for accessibility, thus identifying leaders and laggards in this space.

Action:

- i. Explore partners that can configure interfaces that enable required user inputs for relevant accessibility information
- ii. Partner with companies to add features that promote accessibility within businesses by providing a public score that users can contribute to

Timelines and Success Metrics

- i. Explore partners that can configure necessary interface within one year of launch of the new Accessibility Agency
- ii. Bid out and award contract to develop program within 180 days of partner exploration
- iii. Create a fully functional pilot program within one year of awarding of this contract; overall target is three years since the reading of this report

Issue Owner

- i. The interface program is to be owned by the new Accessibility Agency

Behavioural Change Recommendation 4: Identify organizational benefits in increasing accessibility and build appeal into communications with private sector stakeholders

Context:

The market size of PWD should create incentives for private sector entities to increase accessibility in order to maximize profitability. However, at present few organizations are

aware of the size of the disability marketplace. Moreover, inaccurate preconceptions of PWD poverty have precluded organizations from meaningful action in this space.

From a practical standpoint, creating change is easier and more sustainable through the realization of positive incentives than solely from the threat of regulatory penalty. Not only does it incentivize organizations going above and beyond minimum standards, it also reduces the cost of regularly auditing over 412,000 organizations.

Action:

- i. Identify priority messages to communicate to private and public sector stakeholders, emphasizing economic return
- ii. Communicate these messages amongst stakeholders, prioritizing larger organizations that are likely to be emulated by smaller ones
- iii. Reinforce messaging during audit cycles, especially in instances of non-compliance, to promote change

Timelines and Success Metrics

- i. Identification of key messages within 180 days of the new Accessibility Agency receiving funding
- ii. Targeted messaging disseminated to large public sector stakeholders within 90 days of message identification, to large private sector stakeholders within 180 days of identification, and to medium-sized stakeholders within one year. Mass communication to small enterprises within two years of key message identification or during audit processes, whichever is sooner

Issue Owner

- i. The new Accessibility Agency is responsible for collecting and disseminating key messages of the benefits of accessibility

Behavioural Change Recommendation 5: Deliver nudge-based programs and tools to incentivize more prompt and effective organizational compliance

Context:

Regulation and “strong” incentives, such as those that provide additional funding, are costly. Given the scale of change that must occur in Ontario, reducing these costs is a public expenditure priority providing accessibility targets can be met.

One way of reducing costs is by using information sharing and the desire to emulate more successful practices on the part of public and private organizations to “nudge” compliance. This approach has been used most successfully in the U.K. whose government has invested significantly in this approach.

Action:

- i. As part of accessibility auditing and data collection processes, identify key barriers to compliance in different sized organizations and in different public/private sectors
- ii. Identify leading and/or innovative practices that organizations have used to overcome these barriers while maintaining proprietary information
- iii. Communicate best practices in comparable organizations to those struggling to overcome key barriers to compliance to encourage emulation and build their internal processes and capacity
- iv. Research must be global, beyond Ontario's borders, to maximize impact.

Timelines and Success Metrics

- i. Identification of key barriers within one year of full Accessibility Agency funding
- ii. Identification of leading organizations that have overcome key barriers within 180 days of barrier identification
- iii. Communication of key insights from leading organization to lagging organizations within one year of identification of leading practices, to be repeated during audit periods

Issue Owner

- i. Nudge practices are to be owned by the new Accessibility Agency

Behavioural Change Recommendation 6: Tie public sector results and execution of accessibility plans to compensation packages at Deputy Minister level

Context:

Within an organization, two of the most significant barriers to acting on accessibility commitments are a lack of governance and a corresponding lack of accountability. Establishing governance and accountability starts at the top of an organization. This is true of both the private and public sectors.

Unlike the private sector, the Ontario Government can shape governance within public sector organizations. While recognizing the need for organizational autonomy, leaders of Ministries – Deputy Ministers – must be held accountable for accessibility within their Ministries to avoid a repeat of 17 years of inaction.

Action:

- i. Tie action – the publication of accessibility plans and the meeting of their goals – to compensation for Deputy Ministers. This will establish individual responsibility for instituting proper internal governance and accountability models. To be clear, the Reviewer is recommending that Deputy Ministers be required to sign accessibility plans and that their pay be cut by at least 5% if they do not meet the objectives on accessibility in their plans

Timelines and Success Metrics

- i. Progress, measured in annual progress reports of accessibility plans, to be tied to Deputy Minister signing and pay within three years

Issue Owner

- i. Responsibility for ensuring signing of accessibility plans and pay incentives are executed will rest with the Treasury Board Secretariat, supported by the new Accessibility Agency.

*Behavioural Change Recommendation 7: Formally recognize disability as core platform of Environmental, Social, and Corporate Governance (ESG)***Context:**

At present, ESG is a key pillar shaping business decisions, and one of the core concepts encouraging and incentivizing businesses and public sector organizations to conduct their business and service delivery in ways that capture emerging demand. Explicitly including disability under the “social” component of ESG will accelerate action within organizations by providing easier socialization and harmonizing accessibility initiatives with other areas of corporate governance. Tying accessibility to ESG is also a no-cost way of the Ontario Government signalling the importance of this issue. It also presents an opportunity for the Ontario Government to demonstrate leadership on this file.

Action:

- i. Identify leading large private organizations willing to be first movers in integrating accessibility into ESG
- ii. Alongside potential first movers, collaborate on relevant accessibility standards and definitions to be incorporated into ESG umbrella – for example, The Global Reporting Initiative⁷
- iii. Provide public support to first movers, including announcements from senior government leadership and funding mechanisms

⁷ [Information on The Global Reporting Initiative can be found here](#)

Timelines and Success Metrics

- i. Identify first movers within 1 year, consistent with timelines for nudge tactics
- ii. Working with first movers, create definitions within 180 days of identification of first movers
- iii. Relevant public sector leaders to support announcements from first movers at discretion of first movers

Issue Owner

- i. The new Accessibility Agency will be responsible for identifying potential first movers
- ii. The Ontario Financing Authority will be responsible for working with first movers to establish definitions and to publicly support announcements

Behavioural Change Recommendation 8: Explore and pilot technology and digital solutions to bypass built environment barriers

Context:

Remediations to built environment, while necessary, are both costly and time consuming. To ensure inclusion of PWD in the workplace and as consumers, it is essential to develop rapid solutions that can bypass barriers in the built environment while barriers are remediated. Technology can be leveraged to temporarily overcome these barriers. In particular, insights from the Covid-19 Pandemic can be leveraged to understand how to maximize participation even when built environments remain inaccessible. This includes working from home, digital shopping, and increases in services offered online. Providing a stop-gap to built environment barriers will increase Ontario's workforce and consumer base. Moreover, it should be noted that in the survey commissioned by the 4th Reviewer, PWD consistently indicated they faced few, if any, digital barriers when compared to built environments.

Action:

- i. Identify industries that provide greatest impact from implementing digital technologies that emphasize working from home
- ii. Create and fund pilot project to implement/incentivize digital solutions in select, high value sectors.

Timelines and Success Metrics

- i. Begin return on investment (ROI) analysis for digital solutions within one year of launch of the new Accessibility Agency
- ii. Completion of ROI analysis within 180 days
- iii. Launch of first pilot program within 180 days of completion of ROI analysis
- iv. Public report on preliminary project results after 180 days of program

Issue Owner

- i. The new Accessibility Agency will be responsible for conducting research and this pilot project(s)

Tactical Recommendation Area 3: Mobilizing Government Actions

Notwithstanding the Reviewer's Strategic Recommendations, there is need to further mobilize government action in two key areas: cooperation between levels of government and the enforcement of accessibility legislation in both the public sector (auditing themselves) and the private sector.

Mobilizing Government Recommendation 1: Develop a cooperation framework between levels of government that clarifies their roles in improving accessibility

Context:

Once the Strategic Recommendations are completed it will be necessary to develop clear role expectations for three levels of government: federal, provincial, and municipal. Even prior to the completion of the Strategic Recommendations there is a key need to harmonize provincial and municipal service delivery, as municipalities are often on the front line of service delivery, with the provincial government providing funding.

Action:

- i. Assess level of need to initiate reforms based on specific levels of government. This should be done in consultation with key stakeholders, including a range of municipalities across the province that vary along key demographic factors such as age, population, and population density.
- ii. Assign a federal liaison to coordinate with the new Accessibility Agency to ensure cooperation between three levels of government. Given existing overlap with the ACA, it is imperative that this liaison work with all three levels of government even before completion of Strategic Recommendations

Timelines and Success Metrics

- i. Assessment of potential reforms across levels of government completed within one year of the publication of the provincial accessibility plans
- ii. Appointment of federal liaison within one year of the publication of provincial accessibility plans

Issue Owner

- i. The federal liaison will be tied to the Ministry of Intergovernmental Affairs.

- ii. The assessment of potential reforms will be done by the new Accessibility Agency, in collaboration with stakeholders across levels of government

Mobilizing Government Recommendation 2: Strengthen enforcement measures

Context:

Independent reviews of the AODA have consistently found that enforcement is non-existent. This is in large part due to lack of resources made available given the number of organizations subject to the AODA. While the Reviewer views positive incentives – “carrots” – as preferable to sanctions, sanctions must be available as a viable policy lever. Enforcement should fall under the purview of the new Accessibility Agency to ensure the power to sanction is combined with the knowledge necessary to utilize complementary tactics such as nudging.

Action:

- i. Provide resources to Accessibility Agency to increase number of audits and site inspections – the level of which should be similar in scale to Ontario Securities regulations and CRA audit/enforcement metrics
- ii. Leveraging data collection and organizations identified as leaders in the accessibility space, provide necessary support to small and medium enterprises to comply with regulations (see also Behavioural Change Recommendation 5)
- iii. Provide greater authority to relevant enforcement officials, including the ability to publicize and prosecute instances of non-compliance
- iv. KEY SHIFT: Establish complaint procedures for centralized resolutions of public sector barriers

Timelines and Success Metrics

- i. Develop and implement public complaint procedures within 1 year of the tabling of this document
- ii. Provide greater authority to enforcement officials within 1 year of the tabling of this document
- iii. Allocate additional resources for hiring within provincial jurisdiction of AODA enforcement (keeping in mind strategic recommendations), within 3 years of the tabling of this document
- iv. Create a package of support tools for small and medium enterprises – including explicit funding – to comply with the AODA, leveraging insights from Research and Behavioural Change Recommendations, within two years of the tabling of this document

Issue Owner

- i. Enforcement and complaint mechanisms should be owned by the new Accessibility Agency

Mobilizing Government Recommendation 3: Create the permanent position of Assistant Auditor General, Commissioner of Accessibility within the Office of the Auditor General of Ontario

Context:

The role of Reviewer has proven to be a dull tool to hold the government of the day to account on accessibility. Four consecutive reviews have found fundamental gaps in implementing the AODA. Clearly, this approach has not been effective. Furthermore, it is unclear whether the AODA allows for continued reviews after 2025.

In creating the new role of Assistant Auditor General, Commissioner of Accessibility within the Office of the Auditor General of Ontario, a more consistent approach to oversight is created. This action also elevates accessibility to a prominent place within the formal oversight regime of the province. Given the scale and scope of disability and 17 years of inaction from two duly elected governments, the Reviewer sees this as an appropriate impetus for oversight and public accountability.

Action:

- i. Establish the role of Assistant Auditor General, Commissioner of Accessibility within the Office of the Auditor General of Ontario
- ii. Assistant Auditor General, Commissioner of Accessibility, along with the Auditor General is to report to the Ontario Legislature on the State of Accessibility in Ontario no less than annually.
- iii. These reports must include the following:
 - a. An independent assessment regarding progress made on the Crisis Recommendations made in this report. This shall continue until the Auditor General deems the crisis over
 - b. A financial accounting of program spending for accessibility within Ontario's broader public sector
 - c. An assessment of the level of accessibility in Ontario
 - d. Ongoing recommendations to achieve full accessibility in Ontario's broader public sector

Timelines and Success Metrics

- i. Hire the role Assistant Auditor General, Commissioner of Accessibility under the Office of the Auditor General of Ontario within 180 days of tabling this report

- ii. Publish an audit of action on the Crisis Recommendations contained in this report within 270 days of the tabling of this report. Until the crisis is deemed over by the Auditor General, subsequent gap analyses shall be published every 90 days
- iii. Publish a Report to the Ontario Legislature annually
- iv. Liaise closely with the new Accessibility Agency and Ministries to educate, provoke best practise and audit activity

Issue Owner

- i. The process managed by the Commissioner of Accessibility is to be owned by the Office of the Auditor General.

Tactical Recommendation Area 4: Built Environments

It is the assessment of the 4th Reviewer that built environments must be considered separate from other accessibility initiatives and projects. The reason for this is twofold. First, the cost of remediating built environments far exceeds the capacities of most small or medium enterprises to do so. Even for large organizations, the amount of property owned can make the cost of full remediation difficult if not impossible.

Second, built environment concerns pose a material risk to the Ontario economy. The *Accessible Canada Act* mandates that all federally regulated entities must remove barriers in their built environment. These entities – including all financial institutions and telecommunications providers – are major leaseholders in some of the most lucrative real estate markets in the province. Unless these buildings can be remediated, these organizations will have little choice but to abandon such leases. This will put significant downward pressure on corporate real estate valuations, leading to reduced revenue for the province and larger municipalities.

Built Environment Recommendation 1: Provide financial and non-financial support for existing and new built environment projects as they pertain to accessibility

Context:

The cost of built environment remediations exceeds the ability of organizations to unilaterally bear. Without government intervention, this will create high levels of risk as leases to federally regulated entities expire. These types of interventions represent a perfect risk mitigation role for governments in a market economy.

Action:

- i. Explore social impact bonds for high-cost infrastructure projects (see also Behavioural Change Recommendation 1)
- ii. Issue negative interest rate loans for built environment improvements. These loans should incur negative interest providing accessibility goals are being met, thus incentivizing built environment improvements. Priority should be given to spaces leased by federally regulated entities to mitigate future economic risk

Timelines and Success Metrics

- i. For timelines on social bonds see Behavioural Change Recommendation 1
- ii. Assess requirements and feasibility of negative interest rate loans within one year of tabling this report
- iii. Providing loans are feasible, open first round of applications and assessments within 180 days of completing assessment of feasibility, prioritizing those space leased to federally regulated entities and those with greatest financial risk
- iv. Expansion of program to other entities within five years of launch, prioritizing based on highest cost and number of persons impacted by potential barriers

Issue Owner

- ii. The loan program is to be owned by the Ministry of Economic Development, Job Creation and Trade

Built Environment Recommendation 2: Audit accessibility of public sector built environments**Context:**

It is probable that large amounts of public sector real estate fall short of accessibility requirements. This is in large part due to the large number of older buildings in use across the province. However, to be a leading organization that the private sector can emulate, the Ontario Government must prioritize its own accessibility. The first step to doing this is identifying current gaps, while also making these gaps public to ensure accountability.

Action:

- i. Conduct full accessibility audit of all provincial building, prioritizing education and healthcare
- ii. Publication of audit results on accessibility dashboard

Timelines and Success Metrics

- i. Commencement of audit process within 180 days of tabling of this report

Issue Owner

- i. Each Ministry to be responsible for the auditing of its built environments, in consultation with the new Accessibility Agency

Built Environment Recommendation 3: Ministry of Infrastructure to become Center of Excellence for accessibility in built environments

Context:

As both a high-cost area and one in which the province will be making continued investments to both its property holdings and those in the private sector, it is essential to develop centralized built environment expertise. Consistent with the principle of separating the built environment from the remainder of accessibility initiatives, this expertise should reside within the Ministry of Infrastructure.

Action:

- i. Identify best practices in built environment remediations by identifying leading players and practices in this space
- ii. Create repeatable processes and benchmarks for remediations in different built environments that can be provided to public and private stakeholders
- iii. Create an action team within the Ministry of Infrastructure that can provide expertise and advice to private and public stakeholders for all new projects and remediations

Timelines and Success Metrics

- i. Identification of best practices and leading actors in this space within two years of tabling of this document.
- ii. Creation and publication of sharable documents within 180 days of identifying best practices
- iii. Action team within the Ministry of Infrastructure to be created within two years of the tabling of this document

Issue Owner

- i. New Accessibility Agency to be responsible for initial identification of best practices and leading actors
- ii. Ministry of Infrastructure responsible for creating sharable documents and building internal expertise in consultation with the new Accessibility Agency
- iii. New Accessibility Agency to provide oversight of program

Built Environment Recommendation 4: All provincial buildings to be accessible by 2030

Context:

Given the current state of accessibility progress in Ontario, the goal of provincial government real estate being accessible by 2025 is unrealistic. A 2030 timeline is plausible with material investment. These investments must be made. The Ontario Government must demonstrate leadership in the built environment – the most costly aspect of accessibility – so others will follow.

Action:

- i. Full remediation of all provincial buildings, making them accessible

Timelines and Success Metrics

- i. All provincial buildings pass accessibility audit by 2030
- ii. Highest traffic buildings: schools, hospitals, Service Ontario, and large provincial employers to be remediated prior to 2030 deadline
- iii. Publication of audit results in 2027 and 2030, including explanations for remaining non-compliant environments

Issue Owner

- i. Each Ministry responsible for its own remediations
- ii. Budgetary support to be provided by the Treasury Board Secretariat
- iii. Audit of built environments to be conducted by the new Accessibility Agency
- iv. New Accessibility Agency to publish audit results every three years thereafter to maintain and improve experience for PWD

Conclusion

This report is not intended to be an indictment of the Ontario Government. While the identification of gaps is necessary, the emphasis of the Recommendations Report is how to move forward. It is the conclusion of the 4th Reviewer that accessibility in Ontario currently constitutes a crisis, and that bold and decisive action is needed. Declaring a crisis allows this action to occur. Within one year of the tabling of this document, the Ontario Government must implement all Crisis Recommendations to reduce immediate risks to life and to lay the necessary groundwork for future success in accessibility.

A second bold – and in the eyes of the Reviewer necessary – action is transitioning the regulation of accessibility in the private sector from the Ontario Government to the Federal Government. At present there is a wasteful duplication of regimes for some of the largest organizations operating in the province, as well as a lack of provincial resources to properly audit and enforce the number of small and medium enterprises in the province. These tools are available to the Federal Government. They must be utilized.

Finally, while the Reviewer provides 23 tactical recommendations, emphasis must be placed on lived experience, aggregated as proper data and analysis. The single greatest missed opportunity of the past 17 years of the AODA has been data collection. Without data, there can be no informed decision-making, no accurate measure of improvement, no accountability, and thus no impetus for change. More importantly, data presents the positive case for accessibility.

The case for accessibility is clear for those with experience in disability economics. At least 2.9 million Ontarians currently live with a disability. This number is growing. These Ontarians represent at least 22% of the consumer base and the workforce. Due to barriers, Ontarians with disabilities are too often falling short of their full potential. This is a massive cost to the Province of Ontario, limiting economic efficiency and consumption. They are also voters. The conclusion of the Interim Report opened and concluded with the question “Do you care?” The implications of getting accessibility right – and the continually rising costs of failing to do so – are why the Ontario Government must care. Must prioritize. And must act. Any further delays are an unacceptable risk to the province.

Appendix 1: List of Organizations Consulted by the 4th Reviewer⁸

- Organizations Consulted
- Accessibility Standards Advisory Council
- Accessibility Standards Canada
- AODA Alliance
- Association of Municipalities Ontario
- BC Accessibility Directorate
- Cabinet Office
- Carleton University
- Centre for Addiction and Mental Health
- City of Toronto
- Canadian National Institute for the Blind (CNIB)
- Colleges Ontario
- Conference Board of Canada
- Design of Public Spaces Standards Development Committee
- Employment and Social Development Canada
- Inclusive Research Design Centre
- Ministry of Intergovernmental Affairs
- Inter-University AODA Coordinators
- K-12 Education Standards Development Committee
- March of Dimes Canada
- Metrolinx
- Ministry of Public and Business Service Delivery
- Ministry of Infrastructure
- Ministry of Municipal Affairs and Housing
- Ministry for Seniors and Accessibility
- Ministry of Transportation
- Ontario Human Rights Commission
- Ontario Hospital Association
- Ontario Restaurant Hotel & Motel Association
- Ontario Catholic School Trustees' Association

⁸ Note that the Reviewer spoke to multiple individuals at many organizations, as well as with a series of individuals whose organizational affiliation would reveal their identity if listed here. Moreover, consultations were with individuals within these organizations, and as such, the Reviewer did not meet with the entirety of a given organization.

- Ontario Network of Accessibility Professionals
- Post-secondary Education Standards Development Committee
- Retail Council of Canada
- Supply Ontario
- Spinal Cord Injury Ontario
- Transportation Standards Development Committee
- Treasury Board Secretariat
- University of Guelph
- University of Ottawa
- University of Toronto
- Winnipeg Transit
- YMCA
- United Way of Greater Toronto Area

Appendix 2: Organizations who Submitted Written Feedback to the 4th Reviewer⁹

Organizations

- Accessible Housing Network
- Advancement of Women Halton
- AODA Alliance
- ARCH Disability Law Centre
- Association of Municipalities of Ontario
- Citizens with Disabilities Ontario
- City of Ottawa
- Colleges of Ontario
- March of Dimes Canada
- Ontario Human Rights Commission
- Ontario Public School Boards' Association
- Ontario Society of Occupational Therapists
- The City of Cambridge
- The City of Pickering

⁹ Note the Reviewer also received written submissions from individuals. To ensure anonymity, these individuals are not listed here.