

# Accessibility rules for procurement

How to buy or acquire goods, services or facilities that are accessible to people with disabilities

Presented by Marie-Claude Gagnon, January 2015

# Prerequisites

Common  
core

- Introduction to accessibility
- Customer service

Download

- <https://www.uottawa.ca/respect/accessibility-hub/training>
- <http://hr.uottawa.ca/online-training/oda/>

# Key Messages

- Accessible Procurement = good practice; not about just meeting the minimum standard.
- Consider procured goods/services/facilities from consumer perspective (all aspects of the design).
- Evolution... a continuum.

# Purpose

- To provide information related to the AODA procurement clauses effective 2013.
- To discuss how to include accessibility in your procurement practices.
- Opportunity to apply principles.
- 6-Step Guide.
- Documentation of purchases over and under \$15 K.

# Supports for Accessible Procurement

- Support clients and respond to general inquiries
  - Finance - Processes over \$15K
  - Accessibility Working Group – Speak to your departmental representative for the process under \$15 K.
  - Accessibility Office – Resources and information
  - When the level of approbation required changes, please contact procurement services: [sa-ps@uottawa.ca](mailto:sa-ps@uottawa.ca)
  - 0- \$10K 000: P-card rules/Experts
  - 0-\$ 99K- contract officer/Experts
  - \$ 100K – RFP rules

# Departmental Purchases

# Core Principles of the AODA

- Dignity
- Independence
- Integration
- Equality of Opportunity

# Legislation

## Ontario Regulation 191/11 Integrated Accessibility Standards

### Procuring or acquiring goods, services or facilities

- 5.(1) [Designated] public sector organizations shall incorporate accessibility design, criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable to do so.
- (2) If the Government of Ontario, Legislative Assembly or a designated public sector organization determines that it is not practicable to incorporate accessibility design, criteria and features when procuring or acquiring goods, services or facilities, it shall provide, upon request, an explanation.



# Legislation

Procuring or acquiring goods, services or facilities

6.(1) Without limiting the generality of section 5, public sector organizations shall incorporate accessibility features when designing, procuring or acquiring self-service kiosks.

(2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.

In this section, “kiosk” means an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both

# AODA Accessible Procurement

Procuring or acquiring goods, services or facilities

Beginning January 1 2013, the university of Ottawa has an obligation to incorporate accessibility design criteria and features when procuring or acquiring goods, services and facilities, unless **not practicable.**

# Who is subject to this standard?

This standard applies to all University employees responsible for procuring or acquiring goods, services or facilities. This includes the director of Procurement, assistant directors and procurement officers, chief administrative officers, regional procurement officers and employees responsible for decentralized purchasing at faculties and services.

# Compliance

- Include identified accessibility requirements in specifications.
- All departments must consider accessibility design criteria and features for all purchases regardless of **dollar value**.
- Purchasing documents have been revised to record that accessibility factors have been considered.
- Departments will be responsible to provide justification where accessibility criteria are not included.

# Accessible Procurement Practices

- Incorporate accessibility design criteria and features when procuring or acquiring goods, services or facilities unless not practicable
- Changes have been made to documentation and messaging to vendors & are included in the general terms and conditions of contracts
- Vendors were to be trained by March 1st, 2016.

# Accessible Procurement Practices

- Consider referring non-networked staff and contractors to:
- **Marie-Claude Gagnon**  
Coordonnatrice de la conformité à l'accessibilité Web /  
Web Accessibility Compliance Coordinator  
Bureau des droits de la personne – Human Rights Office  
Université d'Ottawa – University of Ottawa  
1 Stewart (115), Ottawa, ON K1N 6N5  
Tél / Tel: 613-562-5800, P/E 7452  
Courriel / Email : [marie-claude.gagnon@uottawa.ca](mailto:marie-claude.gagnon@uottawa.ca) (Marie-Claude Gagnon – WCAG)
- Direct them to Accessibility Training for External Contractors
- [Accessible Customer Service Online Training](#)
- [Working Together: The Code and the AODA](#)

# Procurement Overview

## STEP 1

Review definitions

- Disability
- Barrier
- Accessibility

*Ensure staff and contractors are trained in AODA*

## STEP 2

Assess potential barriers

- Goods
- Services
- Facilities
- Kiosks

## STEP 3

Include accessibility considerations

- Business Case
- Reports

*Provide JUSTIFICATION where not practicable*

## STEP 4

Develop documents

*Include relevant accessibility specifications*

## STEP 5

Document & retain information

*Relates to COMPLIANCE with accessibility obligations*

## STEP 6

Ensure vendor complies

*Manage the contract THROUGHOUT the term of the contract*

# Common Requirements When Procuring

- Web content materials must be WCAG 2.0 AA compliant and materials must be available in accessible format.
- uOttawa Accessible Design Standards for the built environment.
- All vendors who provide goods, services and facilities on behalf of the University must be trained in both Accessible Customer Service and the Integrated Accessibility Standards Regulations (IASR).



# **uOttawa Guidelines: 6 Steps to Meeting Accessibility Obligations in Procurement**

# Step 1 : Review the Definitions

How does the Ontario Human Rights Code and the Accessibility for Ontarians with Disabilities Act (2005) define:

- Disability
- Barrier
- Accessibility

## Step 2: Conduct an Assessment

Conduct an assessment to determine whether these types of goods or services could create barriers for people with disabilities.

- Procurement of goods or services for students and visitors.
- Procurement of goods or services for uOttawa Employees.
- Prompting Questions & Points to Consider.

## Step 3: Include Considerations

Include accessibility considerations in your procurement **business case and reports**.

- Level of detail may vary
- Include the following information:
  - A description of the need to provide accessible goods or services currently and in the future.
  - The outcome of public consultations conducted by the University.

# Practicum

Using the list of procured goods/services/facilities identified earlier, explore the considerations related to barriers and accessibility.

## Step 4: Develop the Documents

Develop the related procurement documents and include relevant accessibility specifications based on the barriers identified.

### Examples of specifications:

- Different formats when producing a public report
- Online information must meet Web Content Accessibility Guidelines (WCAG)

## Step 5: Document and Retain

Document and retain information relating to your compliance with accessibility obligations.

- Any dollar value.
- Procurement documents serve as records for purchases over \$15K.
- For purchases under \$15K, (P-card, petty cash, PO) process – (Regardless of the process used, all purchases must be recorded in a template and placed in P-drive).

## Step 6: Ensure Vendor Obliges

- Ensure that the successful vendor meets their accessibility obligations throughout the term of the contract.
- Engage in active contract management.



# ACCESSIBLE PROCUREMENT PROCESS

## ASSESS

### STEPS 1, 2, 3

#### REVIEW

- Definitions of **disability, accessibility, barrier**
- Departmental lists of non-practicable items

#### IDENTIFY

- Accessible features, design, criteria
- Potential barriers
- Accessible documents and communication needs
- Built environment – Accessible Design Standards
- Training requirements

**INCLUDE** accessible features, design, criteria

**CONSIDER** Accessibility Impacts of purchases such as in reports to Council

## PURCHASE & DOCUMENT

### STEPS 4, 5

Keep records if an accessible purchase is **NOT PRACTICABLE**

#### UNDER \$15 K

- Use P card, petty cash or other departmental process
- Complete Monthly Verification Form

#### OVER \$15 K

- Forward **accessible procurement specifications** to Supply
- Make **requisition**
- Develop **bid solicitation/bid procurement plan** – include formal specifications
- Include accessible specifications in **evaluation criteria**
- Supply **Contract Approval Request (CAR)** process identifies use of accessible features or not

## FOLLOW UP

### STEP 6

#### “Accessible contract management”

- Did the purchase include the accessible features you requested?
  - Goods with **accessible features**
  - **Facilities** with accessible access throughout such as barrier-free entrances and counters
  - **WCAG-compliant** reports and information in **alternative formats**
  - **Events and consultations** with accessible customer service
- Are there any lessons learned?

# Examples

# Example 1 – Venues

When selecting a conference centre to host an event:

- Ensure the facility has an accessible entrance and washrooms
- Ensure staff are trained in providing accessible customer service.

## Example 2 - RFPs

Consider accessibility in all of your buying decisions

- Where possible, tells vendors in writing the accessibility criteria and features it will consider.
- Provides guidelines on how you will evaluate vendor proposals based on accessibility.
- Where it is not practical to address accessibility concerns, you must explain why in an accessible format, on request.

## Example 3 – Computer monitors

List of requirements when buying new computer monitors:

- The monitors to offer adjustable colours and contrast so they would be accessible to people with vision loss.
- The monitors have to include buttons that users could identify by feeling them and be able to operate easily with one hand.
- The vendors ensures that the instructions on using the monitors are available in accessible formats.

## Example 4 – Hiring Consultants

List of requirements when hiring consultants to train staff:

- Accommodation measures available for trainees with disabilities.
- Provide training material in accessible formats.

## Exemple 5– Purchase new printers

**Situation:** You are buying new printers for the university. There are accessible models that are easier to use for people in wheelchairs, but none will work with the company network.

**Solution:** You can buy a regular printer and put them on a lower table to make it more accessible for employees who use a wheelchair. When it's time to buy new computers or replace the university network, you should plan to choose technologies that will work with an accessible printer.

## Next Steps

- Effective immediately.
- Advise your teams of AODA Accessible Procurement requirements & available resources.
- Develop plan for documenting and retaining information related to accessible purchases for all dollar amounts. For amounts under \$15K, find out the process used by your department.



# Resources

**The Accessibility Office pages and the Accessibility hub include resources such as:**

- 6-Step Guide
- Accessible Procurement Overview
- Points to Consider
- Prompting Questions
- Reference Guides for modifying electronic documents (WCAG)

[Marie-Claude Gagnon](#)

Web accessibility compliance coordinator

613-562-5800 (7452)

[Human Rights Office](#)

- Accessibility help clinics
- Needs assessments
- Made-to-measure tools
- Referrals
- Other support

Accessibility Hub

- [Accessibility policies, standards, laws and regulations](#)
- [Workshops](#)
- [Tools, templates and resources](#)
- Events