

Frequently Asked Questions:

The Accessibility Standard for Information and Communication

This information is available in alternate formats on request.

1. What is the Accessibility Standard for Information and Communication?

The Accessibility Standard for Information and Communication is the third regulation under [The Accessibility for Manitobans Act \(AMA\)](#). The purpose of the standard is to remove and prevent barriers that exist digitally, in print, or through interactions with technology or people.

The standard outlines what organizations must do, and by when, to provide information in an accessible way to all Manitobans, including people with disabilities. Similar to other accessibility standards, the goal of this standard is to promote greater independence and inclusion for people with disabilities.

2. Who needs to follow the Accessibility Standard for Information and Communication?

The standard applies to all organizations in Manitoba with one or more employees. There are different deadlines to meet the standard's requirements, depending on the type of organization. [See question 3 below for deadlines.](#)

3. When does my organization have to comply?

Some sectors have more time than others to comply with the standard. The sector you work in will determine when you need to comply.

✓ **May 1, 2023: The Manitoba government**

✓ **May 1, 2024: Public sector organizations, large municipalities, libraries and educational institutions**

- Public sector organizations include Crown corporations, regional health authorities, Manitoba's 10 largest municipalities and government agencies, boards and commissions.
- Libraries include municipal, regional and City of Winnipeg libraries. Libraries also include libraries within educational institutions.
- Educational institutions include colleges, universities, adult learning centres, private vocational institutions, private and public schools.

✓ **May 1, 2025: Private sector and non-profit organizations, and small municipalities**

- These organizations include businesses and organizations with one or more employees, such as shops, restaurants and professional services and non-profit organizations.
- Non-profit organizations include charities, places of worship, community organizations and member associations.

4. Who benefits from the Accessibility Standard for Information and Communication?

The Accessibility Standard for Information and Communication requires organizations to remove barriers for people with disabilities who access information and communication. Almost one in four Manitobans have a disability, and nearly every Manitoban knows someone with a disability, or will acquire a disability at some point in their life.

There are many ways people access information and communication based on individual preferences and, more significantly, as a result of their differing abilities to see, hear and understand information or communicate with others. Anticipating barriers by presenting information in a variety of ways will improve communication for everyone.

Information and communication accessibility benefits everyone.

5. What does my organization need to do?

Manitoba organizations must already meet the [Accessibility Standard for Customer Service](#) and its requirement to communicate in a way that meets customers' needs. The [Accessibility Standard for Information and Communication](#) provides more specific direction on how to meet customers' needs, including when they are students or library users.

The standard directs organizations to create and maintain accessible websites and web applications. Like the Province of Ontario, and many jurisdictions around the world, the standard directs Manitobans to follow globally accepted Web Content Accessibility Guidelines, or WCAG. [For more information on web accessibility, see question 6 below.](#)

Manitoba organizations must also notify the public and respond to requests for communication supports or accessible formats. Other requirements include providing training, and having a feedback process documenting actions and accommodations made in relation to information and communication.

The Accessibility Standard for Information and Communication requires your organization to have measures, policies and practices in place to address barriers to information and

communication. All public sector organizations and larger private sector organizations, like businesses and non-profits, with 50 or more employees must document their accessible information and communication policies and make them publicly available.

The Manitoba Accessibility Office is developing checklists, templates and other free tools, training and resources to help your organization comply with these requirements.

6. My organization has a website. Do I have to update it to conform to Web Content Accessibility Guidelines (WCAG)?

If your organization's web content is published after the standard comes into force for your type of organization, then yes. Also, if your old web content is required for users to access your goods or services, then yes, it would need to conform to the [World Wide Web Consortium \(W3C\) Web Content Accessibility Guidelines \(WCAG\) 2.1 Level AA](#), at a minimum.

Once the standard applies to you, if your organization is launching or significantly refreshing a web application (accessed on a browser), then your web application must meet, at a minimum, WCAG 2.1 Level AA.

If your organization is a public sector organization (not including small municipalities), a library or educational institution and uses intranet sites, if your intranet content is updated after the standard applies to you, it must follow, at minimum WCAG 2.1 Level AA. If your old intranet sites are required for individuals, including employees, to access information, then they too must meet WCAG 2.1 Level AA requirements.

7. I don't have the skills to update my website or web applications to WCAG 2.1 Level AA. Do I still need to comply with the standard?

If you do not update your web content or web applications after the date the standard applies to you, and they are **not** required to access your goods or services, you would not need to update your web content or web applications.

Under the standard, there are also exceptions where an organization's web content or web applications do not need to meet or exceed WCAG 2.1 Level AA requirements.

If any of the following applies, you do not have to meet or exceed WCAG 2.1 Level AA requirements:

- It is not technically feasible.
- The technology required to publish is not readily available.
- It would result in undue hardship to the organization.

- The organization does not have direct control over the web content or web application.
- The web content or web application relates to product labels or other product information.

8. Will mobile apps need to be made accessible under this standard?

No. The standard only applies to web applications, which are defined as software applications that run on a web server and are accessed by a user through a web browser. This does not include mobile applications. Mobile application developers are still encouraged to keep accessibility in mind for their users when creating and updating mobile apps, as accessibility benefits everyone.

9. My organization provides information to the public. If someone requests it, do we need to provide information in an alternate format?

Yes. Organizations need to consider the ways in which Manitobans interact with or access information they provide. If you receive a request for information in another way, first, consult with the person making the request to identify a support or a format that removes the barrier. Then provide the format in a timely manner. Do not charge the person making the request more than what you would charge to someone who did not make that request.

10. What are examples of alternate (or accessible) formats?

Alternate or accessible formats are formats that present printed or electronic documents in different ways to ensure everyone has equal access to the information. People with disabilities may use adaptive or assistive technology that requires an alternate or accessible format so the technology can access the information in a specific manner for the user.

Examples of accessible or alternate formats include:

- large print
- recorded audio
- electronic or digital documents – for example, formatted to be accessible for use with a screen reader
- Braille
- writing in plain language
- text transcripts of visual and audio information – for example, a video transcript

11. Does my organization need to provide communication supports, like American Sign Language (ASL), if we receive a request?

Yes. If you receive a request to provide a communication support, similar to [providing an accessible format](#), you would first consult with the person making the request to identify a communication support that removes the barrier. You would then provide the support in a timely manner. Do not charge the person making a request more than what you would charge someone who did not make a request.

Examples of communication supports include:

- sign language interpretation
- video relay service (VRS)
- intervenor services
- captioning or audio description
- notetaking
- reading the written information aloud to the person directly

12. What if my organization can't afford to provide a request for a communication support or accessible format?

Under the standard, there are exceptions for most organizations in providing the requested support or format. The exemptions do not apply to library materials or educational materials.

If any of the following applies, you do not have to provide the requested communication support or accessible format:

- It is not technically feasible.
- The technology required is not readily available.
- It would result in undue hardship to the organization.
- The organization does not have direct control over the information.
- The information relates to product labels or other product information.

13. My organization can't afford to provide a requested communication support or accessible format. Does that count as undue hardship?

Reasonable accommodation requires your organization to take responsibility for an accommodation, such as a communication support or accessible format, including bearing the costs up to the point of undue hardship. Undue hardship may be met when

there are extreme costs or significant health and safety risks to provide an accommodation. Inconvenience, preferences or some costs do not usually qualify as undue hardship.

If a request creates undue hardship for you, you still need to explore other ways to provide the communication support or accessible format. Work with the person who is making the request to find another way.

For more information on undue hardship, [please contact the Manitoba Human Rights Commission](#).

14. Is my organization responsible for receiving and responding to feedback about our information and communication?

Yes, your organization must have a process in place to receive and respond to feedback, including complaints, about your information and communication. The process for receiving and responding to feedback must be appropriate to the circumstances and suitable for people with disabilities. Your organization must document all resulting actions arising from the feedback, and make that information available on request.

15. Do I have to provide training on accessible information and communication? Who do I need to train?

All organizations in Manitoba are required to provide training on the standard to their employees, agents or volunteers who:

- communicate directly with the public or another Manitoba organization on behalf of the organization
- maintain or develop the organization's web content
- purchase or procure information technology or communication tools
- develop or implement an organization's measures, policies and practices on accessible communication

If your organization is an educational institution, you also need to train your educators.

Your organization must ensure that training is provided as soon as reasonably possible after the person is assigned the applicable duties. Ongoing training is also required whenever you update or change your policies, measures and practices related to accessible information and communication.

As with the first two accessibility standards, the Manitoba Accessibility Office will develop and offer online training to assist your organization to meet the accessible information and communication training requirements.

16. What does accessible information and communication training include?

Training content must include:

- how to identify, prevent and remove barriers to accessible information and communication
- how to provide accessible information and communication, including through a communication support or alternate formats
- a review of [The Human Rights Code](#), [The Accessibility for Manitobans Act](#) and the Accessibility Standard for Information and Communication.

17. How will the Manitoba government monitor and ensure compliance with this standard?

Once the standard is in force, [Manitoba's Accessibility Compliance Secretariat](#) will conduct audits of policies and other documents related to accessible information and communication. Reviews to determine compliance with accessible web content, web applications and training requirements will also take place. When these are conducted, the aim will be to provide organizations with constructive feedback and, if applicable, a concrete plan to achieve compliance. If this approach is ineffective, activities may be escalated to include sanctions, such as director's orders to comply and the levying of administrative monetary penalties.

18. Does meeting the requirements of the Standard for Accessible Information and Communication protect my business or organization from human rights complaints?

No. While accessibility measures speak well of ensuring the minimum requirements for providing accessible information and communication, they do not rule out the possibility of discrimination as outlined in The Human Rights Code (Manitoba). [The Human Rights Code](#) takes priority over all other provincial laws and regulations, unless specifically noted.

For more information or alternate formats of this document, please contact:

Manitoba Accessibility Office

630 - 240 Graham Avenue

Winnipeg, MB R3C 0J7

Phone: 204-945-7613 (in Winnipeg)

Toll-Free: 1-800-282-8069, ext. 7613 (outside Winnipeg)

Email: MAO@gov.mb.ca

Fax: 204-948-2896

Visit [AccessibilityMB.ca](https://www.accessibilitymb.ca) for information, tools and templates.

Legal disclaimer: This information complements the application of the regulations under The Accessibility for Manitobans Act (AMA). It is not legal advice. For certainty, please refer to the [AMA](#) and the [Accessible Information and Communication Standard Regulation](#).

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