

**EARLY LEARNING AND CHILD CARE –
Accessible Information and Communication Standard
Frequently Asked Questions
Circular: ELCC-2024-11**

1. What is The Accessibility for Manitoban’s Act?

The Accessibility for Manitobans Act was enacted in 2013 and provides a process to remove barriers for people with disabilities. Regulated accessibility standards are the building blocks for making real, measurable, and effective changes to accessibility. Each accessibility standard outlines specific requirements and timelines for organizations that have a responsibility to comply with the act. More information on the Act can be found here: <https://accessibilitymb.ca/accessibility/the-accessibility-for-manitobans-act.html>

2. What is the purpose of the Accessible Information and Communication Standard?

The Accessible Information and Communication Standard Regulation, under The Accessibility for Manitobans Act, came into force May 1, 2022. It builds on existing requirements of Manitoba’s Human Rights Code and requires organizations to identify, remove and prevent barriers that exist digitally, in-print or through interaction with technology or people. It also adopts globally recognized web content accessibility guidelines as a minimum requirement. More information on the Regulation can be found here: <https://accessibilitymb.ca/accessibility/act-standards/the-accessibility-standard-for-information-and-communication.html>

3. Who must comply with the Accessible Information and Communication Standard?

All organizations in Manitoba with one or more employees must comply with the Standard. This includes all licensed child care centres (including nursery schools), whether located in a school or elsewhere, as well as family/group home providers with one or more employees or who hire casual staff.

The Standard does not apply to home-based programs that do not have employees or hire casual staff.

4. What are the compliance deadlines for early learning and child care facilities?

Business and non-profit organizations are required to comply by **May 1, 2025**.

This includes all licensed child care facilities as outlined in question 3 above.

Compliance with this Standard is already required of Manitoba organizations, including public and independent schools.

5. What are the requirements of the Accessible Information and Communication Standard?

- **Web Applications:** web applications must meet WCAG 2.1 level AA, at minimum, if an organization is launching or significantly updating their website or if the website is used to access an organization's goods and services. A web application is any software application that is run on a web server and accessed by a user through a web browser.
- **Web Content:** any new or updated web content must meet WCAG 2.1 level AA guidelines. This applies to any website content published on or after this standard comes into force. Older website content must be updated, if it is required to access information related to an organization's goods and services.
- **Accessible Information and Formats:** must inform the public and employees that information can be requested through a communication support or accessible format. This may include information related to emergency procedures or public safety.
- **Providing Accessible Information:** when requested, consult with the person to identify the support or format that would remove the barrier and provide the information in a timely manner at no or equal cost.
- **Feedback Process:** develop a process to receive and respond to feedback about accessible information and communication, document responding actions and provide it on request.
- **Training:** provide timely and ongoing accessible communication training to any employee assigned applicable duties within the organization.

6. Who at a child care facility is required to understand this Standard and meet compliance requirements?

Meeting the Standard, including completing required training, applies to all child care facility staff (including casual staff), board members and volunteers, as well as family/group child care home providers in scope of the regulation, who:

- communicate with the public or with stakeholders on behalf of your child care facility
- maintain your website and/or web content (includes any third party vendors)
- purchase or procure information technology or communication tools
- develop and implement your facility's policies, practices and procedures related to accessible information and communication

7. What do the Internet requirements (WCAG 2.1 level AA standards) mean for child care facilities?

The Accessible Information and Communication Standard Regulation requires child care facilities to remove barriers for people with disabilities who use their websites and view their web content. All child care facilities must ensure that their Internet (external) website and web content meet or exceed globally followed [World Wide Web Consortium \(W3C\) Web Content Accessibility Guidelines \(WCAG\) 2.1 Level AA](#) if one or more of the following applies:

- the web content is published on or after this standard comes into force (i.e. May 2025), and/or
- the web content is required to access an organization's goods and services (e.g. child care registration)

8. What are 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 (formatted to be accessible for use with a screen reader), Braille, writing in plain language, and text transcripts of visual and audio information (video transcript). American Sign Language (ASL) and/or close captioned interpreted documents and videos.

9. What are communication supports?

Communication supports facilitate communication between two or more people and help organizations to effectively communicate with a wide audience.

Examples of communication supports include: sign language interpretation (ASL), video relay services (VRS), Deaf-Blind Accessibility Interpreters, captioning or audio descriptions used in video content or virtual meetings, notetaking, reading the written information aloud to the person directly.

10. Does this Standard require child care facilities to offer educational material/ learning resources in alternate formats or via communication supports?

No. Providing education materials in an alternate format or by a communication supports is not a requirement under this Standard for child care facilities.

However, all licensed child care facilities must comply with [The Community Standards Child Care Act](#), which includes having an Inclusion Policy and ensuring an inclusive environment. For example, when a facility is accommodating a child with a visual or hearing impairment, the facility is responsible for providing these resources, similar to providing other operational child care programming resources for their facility.

11. Does the policy documentation requirement apply to an affiliation group of facilities?

This requirement applies to an individual child care facility with 50 or more employees.

All licensed child care facilities are encouraged to write down all policies, measures and practices related to accessible information and communication, including the content and timeframe for training and make these documents publicly available as best practice.

12. How can a facility staff, board members or volunteers access the required online training and learn more?

Child care facilities can access the online training module specific to the Accessible Information and Communication Standard available at the Accessibility for Manitoba - Online Learning Portal at:

www.accessibilitymb.ca/resources-events-and-training/online-training.html.

13. What happens after a certificate of completion of the required training is received for this Standard?

Upon completion of the online the Accessible Information and Communication Standard training module, participants will receive a certificate of completion. Participants should retain a copy for their records, and are encouraged to provide a copy of the certificate of completion to the Director or the designated administrator of their child care facility in the event an audit related to training is conducted. It is up to each facility how they will ensure that records, such as training certificates, are maintained.

Note: If the online training has already been completed through another organization, the individual is not required to retake the training.

14. Is there a time limit for the retention of certificates of completion for the online training?

There is no specific time limit for the retention of certificates, however refresher training is considered a best practice. Some organizations have chosen to require employees to retake the training every three years, for example, but this is not a regulatory requirement.

15. Who is responsible for monitoring compliance under this Standard?

The Accessibility Compliance Secretariat is responsible for monitoring compliance and conducting an audit. Organizations may be selected for review, or they can be inspected with or without notice. If results from a review or an inspection show that the organization is not in compliance with the Standard, a plan will be developed to help the organization reach compliance through training, guidance and sharing of tools and resources.

16. What if a facility cannot meet the requirements under this Standard?

It is good practice for child care facilities to identify, remove and prevent barriers that exist digitally, in-print or through interaction with technology or people.

While child care facilities are required to meet the requirements outlined for this Standard, in some cases, exceptions may be considered such as technical feasibility and in cases of undue hardship. Additional information about exceptions considered are provided in the online training for this Standard and by visiting the Manitoba Accessibility Office website at: <https://accessibilitymb.ca/accessibility/act-standards/the-accessibility-standard-for-information-and-communication.html>

17. Is there funding available to support the implementation of compliance requirements of this Standard?

Yes. The Manitoba Accessibility Fund, managed by the Winnipeg Foundation and administered by the Department of Families, offers a one-time grants of up to \$50,000 to help Manitoba organizations and businesses remove barriers, create awareness and support compliance with *The Accessibility for Manitobans Act* and its standards. Application will be available early 2025. To learn more, visit the Manitoba Accessibility Office website at: <https://accessibilitymb.ca/grants-and-awards/manitoba-accessibility-fund.html>

Additionally, licensed child care facilities may consider various existing early learning and child care grant funding options to support compliance, such as the annual operating grant and any remaining funds provided through the Quality Enhancement Grant. To learn more, visit the early learning and child care grants page at: www.manitoba.ca/education/childcare/centres_homeproviders/providers_resources/grants.html

18. In addition to the online training, what other resources are available to support the implementation of the compliance requirements for this Standard?

All child facility staff are encouraged to review the Manitoba Accessibility Office Resource section for additional resources and tools to help their staff understand the Standard and supports that can assist with implementation such as checklist for compliance, tip sheets for accessible documentation, and a handbook:

www.accessibilitymb.ca/resources-events-and-training/resources-and-tools.html#InformationandCommunication

Who can I contact for more information?

If you have any questions related to compliance with the requirements of The Accessible Information and Communication Standard Regulation, please contact the Accessibility Compliance Secretariat at 204-792-0263 or accessibilitycompliance@gov.mb.ca .