

Recommendations for the Equitable Access to Reading Program

July 2022

Overview

An Equitable Access to Reading Program (EARP) is critical to ensure that inclusive reading options in Canada exist beyond just the marketplace, as well as to address the lack of equitable access to reading materials and information. Canada's Charter of Rights and Freedoms and federal legislation, like the Accessible Canada Act, and international obligations from the Convention of the Rights of People with Disabilities (CRPD) and the Marrakesh Treaty, provide a solid framework for the equality aspect of the new program. The CRPD, adopted by the United Nations in 2006, addresses basic rights that people without disabilities can take for granted but that people with disabilities have often been denied¹. The Accessible Canada Act seeks to benefit persons with disabilities through the proactive identification, removal and prevention of barriers to accessibility, including information and communication technologies (ICT), and communication other than ICT as part of the seven priority areas. A comprehensive program that can address the inconsistent and inequitable access to reading materials is needed.

Canadian independent publishers have made considerable progress in making their ebooks accessible at-source as part of the 5-year planned transition towards industry-based production and distribution of accessible reading materials to Canadians with print disabilities. However, more than halfway through the Canada Book Fund investment, it is clear that industry alone cannot address all aspects required for a fully equitable reading landscape.

An EARP will ensure equitable access to reading services and information for the approximately 3 million people across Canada with print disabilities, regardless of age, economic circumstances, technical expertise, or where they live. This dedicated, permanent program would focus on the reading needs of people with print disabilities in all regions of Canada, ensure access to reading material in multiple accessible formats and contribute to

¹ Articles 9 and 21 of the CRPD address the right of accessibility to information and to the tools of the information society for people with disabilities. The CRPD directs that state parties to the convention shall take appropriate measures to ensure persons with disabilities access, on an equal basis with others, to information and communications, including information and communications technologies and systems, and electronic services (from Article 9(1)(b)).

the ability of those with print disabilities to fully participate in learning, work and community life.

The program must be comprehensive to effectively address the existing and remaining inequities to access to reading and information. The process to create this program needs to ensure that policies and practices are equitable, purposefully fulfilling the needs of the broad range of people with print disabilities in Canada, including indigenous communities, and people living in remote locations with poor internet connectivity.

Collaboration between government and stakeholders is required if EARP is to be successful. Stakeholders that should be part of this collaborative process include public libraries, educational institutions (both post-secondary and the K-12 sector) and their libraries, federal/provincial/territorial governments and agencies (including Library and Archives Canada), publishers and related organizations, community and service organizations, indigenous organizations, related international organizations, private sector companies as appropriate and others.

It is critical that the EARP be responsive, and accountable to the public it will serve. To that effect, all aspects of the EARP should be informed by people with lived experience of print disabilities, to ensure it reflects the needs, values and input of the community it will serve. Their expertise will continue being indispensable to evaluate usability and provide quality assurance, create awareness around accessibility, identify and eliminate barriers, and help content creators and distributors to produce and share content that works for everyone, regardless of ability.

Findings from the “How Do You Read?” Study

It is essential that an EARP is informed by the needs and opinions of people with print disabilities. To that effect, this section presents findings and recommendations from the “How do You Read?” (HDYR) study which was conducted in 2020 by the National Network for Equitable Library Service (NNELS) as part of the Accessible Publishing Research Project sponsored by eBOUND and the Association of Canadian Publishers. The primary purpose of the HDYR study was to learn about the reading habits, needs and preferences of people with print disabilities in Canada. Over 600 people with a variety of print disabilities from across the country participated, through a comprehensive online survey and focus groups. Some of the key findings are as follows:

- Accessible reading organizations such as NNELS and CELA must continue to increase the availability, selection and variety of accessible books and to fully implement the Marrakesh Treaty to enable access to international works.
- 58% of participants stated that learning and using book reading technologies was very difficult, inconvenient and time-consuming. Even if books are technically accessible, reading is often overly difficult to achieve.
- Participants identified a significant need for more low-cost or free training and support about how to use reading technologies and to raise awareness about

accessible reading services to all people with print disabilities, paying special attention to under-served groups.²

- About 25% of study participants cited costs—of reading technologies and/or books—as a barrier to reading. Many study participants reported that disability subsidy programs were inadequate to meet their reading needs, and that these programs were inequitable among people with different kinds of disabilities and among people living in different parts of Canada.
- More research is needed to understand the reading needs of people across the diverse spectrum of disability and background.
- There is an ongoing need for research into new formats and technologies needed for the various disabilities and a commitment to developing technological solutions to delivering these new methods and formats to the diversity of readers with reading disabilities.
- The vast majority of survey respondents get books from their public library or from an accessible reading service organization (such as CELA and NNELS).
- Participants want easy-to-use search platforms that are DRM-free that allow seamless searching and downloading of accessible material.

6 Key Principles of the Equitable Access to Reading Program

The EARP should be founded on 6 key principles. For each principle below, we include the parameters of the work to be supported and suggested guiding questions for stakeholder consultation. Each section pulls on recommendations made in the 2018 Working Group Papers from the Alternate Format Working Group as well as key findings from the “How Do You Read?” study” done in 2020 as summarized above. Together, these areas demonstrate the scope and breadth of work to be funded under the new program; work that is essential for those with print disabilities to fully participate in learning, work and community life.

1. Ensure that all content can be made accessible to a diverse community of people with print disabilities.

Description

It is estimated that less than 10% of published works in developed countries and less than 1% in developing countries are ever made into accessible format(s).³ An EARP must ensure that material, including that from multinational and international publishers, is available to a wide array of communities – including new Canadians and indigenous populations.

The flexibility of format and distribution choice ensures an equitable landscape for people with disabilities. Ongoing support for alternate format production of material that has not

² The HYDR study defines under-served groups as such as readers of French, people with learning disabilities, physical disabilities and low vision, women, low-income people, Indigenous Peoples, People of Colour, people who live in non-metropolitan areas, children and youth, seniors, and people with recent-onset print disabilities.

³ The International Agency for the Prevention of Blindness. 2017. "Ending the book famine : The Marrakesh Treaty". <https://www.iapb.org/news/ending-the-book-famine-the-marrakesh-treaty/>

been published in a born-accessible format remains essential. This can include backlist titles, grey matter, titles from smaller publishers, government publications and more. Alternate format production encompasses from-scratch production from published works as well as remediation and/or format shifting of existing content to meet specific user needs. Alternate format production must also encompass a diverse choice of distribution channels to readers across Canada, using both physical and digital methods. Formats may include, but are not limited to: braille, print-braille, human-narrated audio, synthetic audio, synced audio and text, etext, epub, and word; these may be distributed as appropriate as print-braille books, embossed braille, CDs, content on audio players, braille displays and other assistive technologies, electronic storage devices, digital download (including zip and direct to player), smart speaker delivery and more.

It is also essential that technological development is funded to support alternate format production and distribution. As part of the from-scratch production, remediation, format shifting and distribution processes of alternate format creation, there is an ongoing need to develop and iterate technological solutions to make the process more efficient and cost-effective, but still retain an equitable and quality reading experience.

This work must be done in collaboration with other stakeholders. Partnerships with publishers and other copyright holders are essential to create innovative, efficient and cost-effective workflows and processes, to minimize duplication of effort and to maximize the amount of material that can be made available in accessible format. Though industry will do what it can to produce accessible content, there will always be a need for ongoing alternate format production and distribution of books when the content is not made born-accessible at source. The new program should also support work that develops relationships with and support for Indigenous communities to help them serve members of their communities with print disabilities, including access to works in Indigenous languages.

Guiding Questions

1. How can alternate format producers work in collaboration with publishers and content creators to both minimize duplication and increase availability of material in accessible formats?
2. How can alternate format producers identify content and work that will not be made born-accessible by industry?
3. What research is necessary to understand the various format needs for the diversity of readers who need accessible material?
4. What technological developments are needed to support the efficient and timely creation of alternate format materials?
5. What support is needed to ensure ongoing delivery of accessible reading material through publicly funded organizations to people with disabilities across Canada?

2. Recognize that people with print disabilities face economic and social barriers that industry-based production and distribution will not be able to fully address.

Description

A publicly funded service needs to be provided to those users who do not have the economic means to gain access to accessible content. The service includes use of all the collections including offering format and distribution choice, training on accessible reading technologies and digital literacy, helping users navigate the digital divide, and providing information, support and, in some cases, appropriate hardware and software for reading.

Training, outreach and support to stakeholders other than users is also important; this includes organizations, educators and other professionals working with people with disabilities to ensure that all related stakeholders understand and know the services that are available to people with disabilities. The work here is intergovernmental and there needs to be engagement between the provincial/territorial governments and the federal government to leverage funds and ensure equity to access for everyone across the country. Work needs to be done across the jurisdictions to ensure support for the format and reading technology of choice for people who need it, including support for subsidized technology for reading.

Guiding Questions

1. What economic and social barriers to reading do people with disabilities face and what supports do they need to overcome these barriers?
2. What partnerships are necessary to ensure Canada-wide equitable access to hardware and software that allow accessible reading, knowing that each province and territory administers and maintains their own funding program?
3. What training and awareness is needed for users to understand the landscape of accessible reading?
4. What training and awareness is needed for anyone supporting or providing services to people with disabilities to ensure equitable access to reading?
5. What methods of distribution are required, recognizing the diversity of user needs across various demographics including age, economic position, and access to connectivity?
6. What user research is needed to fully understand the social and economic barriers to reading?

3. Support for multiple formats, including braille, is essential for an equitable reading landscape.

Description

Many accessible formats, such as braille, are not viable formats in the marketplace, and publicly funded services, like those currently provided by NNELS and CELA, are needed to ensure equitable access to all formats. There is an ongoing need for support for multiple accessible formats, such as braille and human-narrated audiobooks, in addition to the born-accessible ebooks created by publishers. Different users need different formats so it is essential that multiple accessible formats continue to be offered to readers depending on their preference. The HDYR study recommended more research into format production, ideally done in collaboration with the publishers, on academic and occupational texts, human-narrated audio, and text with synchronous audio (both synthetic and human-narrated).

As previously mentioned, support for multiple formats also includes a diverse choice of distribution channels to readers across Canada, using both physical and digital methods. Formats may include, but are not limited to: braille, print-braille, human-narrated audio, synthetic audio, synced audio and text, etext, epub, word; these may be distributed as appropriate as print-braille books, embossed braille, CDs, content on audio players, braille displays and other assistive technologies, electronic storage devices, digital download (including zip and direct to player), smart speaker delivery and more.

In addition to the provision of multiple formats, it is also essential that technological development is funded to help create software tools to support the automated creation of new formats as much as possible, while ensuring an equitable and quality reading experience.

Guiding Questions

1. What research is needed to best understand the reading needs of people with disabilities across Canada?
2. What technological developments are needed to best offer new formats and technologies for readers across Canada?
3. What collaborations are required to ensure that Canada is a leader, both nationally and internationally, in research and development in new standards and formats for accessible reading?
4. What existing and emerging formats should be supported for readers with disabilities?

4. Access to published works for people with print disabilities internationally through the Marrakesh Treaty should be facilitated by organizations that are independent from industry.

Description

The federal government has a responsibility to fulfil the requirements of the Marrakesh Treaty and funding provided through the EARP would ensure Canada is meeting its obligations. Organizations such as CELA and NNELS are integral to facilitate the exchange of accessible material across borders. Support for technological development is essential to ensure efficient and timely exchange of material. Partnerships with international organizations, including WIPO's Accessible Books Consortium, are essential to fully realize the potential of Marrakesh. In addition, research and policy work needs to be undertaken to ensure that the Canadian Copyright Act and the Marrakesh Treaty continue to meet the needs of people with disabilities. In addition, it is essential to work with publishers to capitalize on the potential of the Marrakesh Treaty so that all accessible material can be made available and distributed across Canada and internationally through Marrakesh. Industry does not have the capacity or the interest to facilitate the exchange of accessible material across borders, so without funding for this work to non-profit organizations, Canada will not be able to fulfill its obligations under the Marrakesh Treaty.

Guiding Questions

1. What legislative changes, if any, are needed to ensure that people with print disabilities in Canada can access international works through the Marrakesh Treaty and to fully meet the spirit of Marrakesh?
2. What technological development is needed to offer full access to the power of Marrakesh, both incoming and outgoing?
3. What partnerships and collaborations, both within industry and elsewhere, are required to fully meet the spirit of Marrakesh?

5. Accessibility expertise and equitable reading must be supported and made available independent of market forces.

Description

An EARP must ensure that organizations, like NNELS and CELA, which have expertise in accessible reading content are funded and able to ensure that these services and issues continue to be at the forefront.

Accessible reading expertise goes beyond just offering accessible content for reading: this program should also ensure that accessibility knowledge and expertise as it relates to literacy and reading continues to grow. It is also essential that the knowledge and expertise of people with lived experience with disabilities, as well as other intersectional identities, are an integral and significant part of the work. Also essential is ongoing user research and understanding of the reading needs of people with disabilities. The work is multi-faceted but includes the following:

- Research and support for accessible publishing and documents, including government information
- Accessibility testing and consulting
- Accessibility legislation - working with federal and P/T governments to inform any legislation that affects equitable access to reading
- Continuation of the Accessibility Publishing Summit and also support for additional summits into other areas around accessibility and reading
- More research into the reading needs of people with disabilities, including those who are impacted by multiple disabilities

Industry cannot lead this work as there will always be marketplace priorities that will override the needs and interests of people with disabilities, especially those that face additional barriers, including economic status, demographic or gender identity. It is essential that work in this area is carried out independent of the marketplace.

Guiding Questions

1. How should the expertise of people with disabilities be best incorporated into the equitable access to reading landscape?
2. What user research is needed to better understand the needs of readers with a variety of disabilities?
3. What collaborations and partnerships are needed to ensure that accessibility issues remain at the forefront for literacy and reading?

4. What are the needs for summits and sharing of information around accessible reading?
5. What are the impacts of accessibility legislation both provincially and federally on accessible reading and what training and guidance do the stakeholders need?

6. Mainstream reading systems, tools, and devices can be complicated and expensive, and support for the provision of accessible services will continue to be essential.

Description

An EARP must ensure that organizations that offer a repository of reading content for people with print disabilities can continue to provide a robust and forward-thinking accessible national dedicated reading service. CELA and NNELS already offer repositories of accessible reading material to those with print disabilities, and these repositories, including the technological infrastructure, need to be supported at the federal level for their sustainability and growth. These repositories are currently partially supported at the Provincial and Territorial level, and, in some cases, the individual library level, but that support needs to be augmented at the federal level to ensure equitable access across the country and to ensure the ongoing technological maintenance and innovation for discovery and delivery of the content.

The new program could also support work towards the development of an integrated search and discovery interface to all alternate and accessible format material in Canada (across all sectors including post-secondary and K-12) and a mandated DRM-free deposit collection of accessible books from the Canadian independent publishing industry to be made available to people with print disabilities. This new integrated collection would include the repositories of alternate format organizations such as NNELS and CELA, born-accessible published content from Canadian publishers, and collections from the post-secondary and K-12 communities. Support for technological development is essential for the creation of this shared search and discovery system for accessible formats across Canada.

Guiding Questions

1. What technological support is needed to support publicly funded accessible reading repositories?
2. What kind of integrated search and discovery experience needs to be realized in order to offer a seamless, easy-to-use platform for getting accessible material?
3. What collaborations are necessary to ensure that all accessible content, from industry, libraries, and alternate format producers, are available in an integrated system?
4. What are the benefits of a publicly funded integrated search and discovery interface for accessible materials in Canada?

Structure of the Program

Budget 2022 allocated \$7 million for 3 years starting in 2024-25 to launch a new Equitable Access to Reading Program. Understanding that this program is not necessarily specific to

any given organization, it is important to outline what organizations are eligible under this program. The program should be available to Canadian not-for-profit organizations and at least 75% of these funds should be supplied to those groups that can provide national accessible reading services in both official languages to people with print disabilities across Canada and who have proven capacity and expertise to deliver on these services. National accessible reading services provide an economy of scale that cannot be realized by smaller local community organizations. Essential as well to the program, is the encouragement of innovative partnerships with organizations across the landscape. The remainder of the funds may be used for smaller, more local organizations who can participate regionally or at a smaller scale in providing service in this sector that will complement the work of the national accessible reading services. For all organizations, it is essential that the work and services funded are informed by people with print disabilities.

Conclusion

It is critical that the approximately 3 million people in Canada that have print disabilities can access reading services and information, both in and beyond the marketplace, so that they can fully participate in society. Previous models from the federal government proposed a solely industry-led solution for accessible reading materials but it is clear that this model cannot fully meet the needs of the community. A new revised strategy which includes the work funded under the EARP as outlined above is essential.

The EARP will ensure that all content can be made accessible to a diverse community of people with print disabilities, a group that faces economic and social barriers that industry-based production and distribution will not be able to fully address. Support for multiple formats, as well as access to published works internationally through the Marrakesh Treaty, will continue to be important aspects for an equitable reading landscape across the country. Being informed by the accessibility expertise of people with lived experience of disability, the EARP will be able to mitigate implications of the complexity and lack of accessible features of mainstream reading systems and devices. All these pieces will promote the economic and social inclusion of persons with print disabilities and help to create a barrier-free Canada.

Who We Are?

The National Network for Equitable Library Services (NNELS), which is a project of the BC Libraries Cooperative, and the Centre for Equitable Library Access (CELA) are national not-for-profit organizations that provide accessible reading services to the approximately 3 million people across Canada with print disabilities.

CELA and NNELS offer a critical and necessary public service to ensure equitable access to reading for those across Canada with print disabilities. Print disabilities encompass those who are blind or visually impaired, people with cognitive disabilities such as dyslexia and those with physical disabilities that make it difficult to read a physical book. The services provided by NNELS and CELA ensure that people with print disabilities across the country are more able to fully participate in their community and contribute to the social, cultural, and economic development and success of their local communities and Canada as a whole.