# Access Canada — Business Plan

**Access Canada** — A national web accessibility compliance audit platform for non-profit and commercial organizations
August 2026

> **A note on the name**: The product brand is provisionally **Access Canada**, chosen to reflect a business that starts in Ontario and is built to serve the country. The codebase, domains and servers still carry the original name, Access Ontario. Renaming those assets is a separate technical task that will be completed once the project is formally underway; it has no bearing on the commercial case set out here.

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## Table of Contents



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## 1. Executive Summary

**Who we are.** Access Canada is a live, production-ready SaaS platform for web accessibility compliance auditing. It combines an automated scanning engine — built on several integrated open-source engines with our own rule mapping, covering 11 standards tags across WCAG (Web Content Accessibility Guidelines) 2.0/2.1/2.2 AA and above — with a human review workflow and a formal sign-off audit trail. Non-profit organizations are our primary market, and we take them through the full cycle: finding the problems, fixing them, and documenting the result. The AI human-simulation review layer has been built to a working first architecture and validated at small scale; it needs funding to move into staged production deployment (see Section 5.5).

**The problem.** Every Ontario non-profit and private business with 20 or more employees must file an AODA accessibility compliance report by **December 31, 2026**. Non-compliance carries fines of up to $100,000 per day. Non-profits are in the hardest position. Of Ontario's 64,000 non-profits and the 170,000 nationally, very few can afford Siteimprove ($5,000–50,000+/year) or Level Access ($50,000+/year). The cheap alternatives — UserWay and accessiBe, from $49–490/year — are accessibility overlays, widely regarded in the field as failing to deliver genuine legal compliance, and several have been named as defendants in litigation. Most of these vendors are American, and few offer independent technical support from a Canadian team. Our answer is an audit and remediation service delivered entirely on Canadian technology, serving **non-**

**profits first** (the 550 IRCC-funded SPOs fall squarely in this group) while also taking on the commercial organizations that carry the same reporting obligation (see Section 5.4).

**The opportunity. IRCC (Immigration, Refugees and Citizenship Canada)** distributes over **$1.1 billion** annually through the Settlement Program to roughly **550** Service Provider Organizations (SPOs) across the country; planned spending for 2025–26 is approximately $1.125 billion. If IRCC were to make web accessibility auditing a condition of its funding agreements and designate Access Canada as the authorized auditor, all 550 SPOs could achieve genuine, auditable accessibility compliance at low cost. Access Canada would gain the stable revenue base needed to sustain its technical development and create jobs, and Canada's domestic IT sector would benefit alongside it.

**Two requests.** First, start-up operating funding over two to three years (Section 10). Second, that IRCC incorporate accessibility compliance auditing into its SPO funding agreements. The two work together: capital without the policy channel, or the channel without capital, would not produce the outcome described here.

The return on this public investment: all 550 IRCC-funded organizations reach genuine, auditable compliance between 2026 and 2028 at a fraction of the cost of building in-house capacity — and the same investment seeds a Canadian accessibility technology company that becomes financially self-sustaining and can extend to the country's 170,000 non-profits and, later, to entities regulated under the federal *Accessible Canada Act*, which face 2027–2028 deadlines.

**The five-year projection** (all figures are cash actually collected; see Section 9): total revenue reaches approximately **$4.47 million in Year 3**, exceeding operating costs by roughly **$900,000** — the year the business crosses into profitability. By Year 5, total revenue is approximately **$11.40 million**, made up of **$9.69 million** in subscription revenue and **$1.71 million** in one-time remediation work. Headcount grows to about 50. Across the non-profit sector, the same work saves tens of millions in compliance costs and materially reduces legal exposure.

These projections already include all three revenue lines now in development: Channel A (IRCC SPO subscriptions), Channel A+ (subscriptions from organizations funded by other government bodies), and Channel C (Ontario commercial subscriptions, counted from Year 1 onward — see Section 5.4), together with the one-time remediation service that runs across all of them. Year 5 is the beginning of the policy-channel curve, not the end of it. From Year 6, Channel A+ continues to expand while Channel B (the broader non-profit market, 170,000 organizations) and the federal ACA market come online. By roughly Year 8, ARR (Annual Recurring Revenue) has a credible path toward **$20–25 million** (see the long-term outlook in Section 8).

**What $2.9–3.65 million in staged funding buys over five years:**

1. A Canadian accessibility technology company that is profitable from Year 3, reaches **$11.40 million** in total revenue by Year 5, and is still growing quickly (subscription ARR on a path to **$20–25 million** by roughly Year 8 — see Section 8)
2. **2,300** government-funded non-profits and **450** Ontario commercial organizations — **2,750** in total — holding genuine, auditable accessibility compliance, saving the non-profit sector and small business tens of millions in compliance spending
3. **50** direct technology and compliance jobs, plus roughly **8** full-time positions supported through the certified developer partner network — about **58** jobs, all in Canada (see Section 11)
4. A dedicated compliance dashboard for IRCC, giving continuous visibility into accessibility across the entire Settlement Program at no ongoing cost (see Section 3)

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# 2. The Problem: Compliance Pressure on Non-Profits

## 2.1 The legal deadline is real and close

- The AODA (Accessibility for Ontarians with Disabilities Act) [1] requires private and non-profit organizations with 20 or more employees to file an accessibility compliance report by **December 31, 2026**
- The technical standard is WCAG 2.0 AA

- Penalties: under AODA section 37, liability runs on two independent tracks. A corporation faces fines of up to $100,000 per day; an individual — including a director or officer who failed to exercise due diligence — faces up to $50,000 per day, and both can be pursued separately. In practice, enforcement has centred on reporting failures in the $500–15,000 range, but the legal exposure is real [2] [1]

## 2.2 Nothing on the market fits a non-profit

| Option | Why it does not work |
|---|---|
| In-house manual review | Requires specialist accessibility knowledge that non-profits generally do not have on staff |
| UserWay / accessiBe overlay widgets | Cheap on the surface at $49–490/year, but widely held in the field **not to constitute genuine compliance** — a JavaScript layer that masks problems rather than fixing them, and repeatedly a defendant in ADA (Americans with Disabilities Act) litigation [3] |
| Siteimprove / Level Access | Genuine enterprise-grade audit depth, but priced at $5,000–50,000+/year, well beyond a typical non-profit budget [3] |

**The gap:** there is no option on the market that is both genuinely compliant and affordable for a non-profit. That gap is where Access Canada sits.

## 2.3 The policy path: prove it in Ontario, replicate nationally

- The AODA is the earliest and most fully developed provincial law enforcing web accessibility compliance in Canada. The federal *Accessible Canada Act* (ACA) currently reaches only "federally regulated entities" — banks, telecommunications and transportation operators, broadcasters, Crown corporations — and does not extend to ordinary non-profits [4]. Those entities must reach WCAG 2.1 AA compliance by 2027–2028 [4].
- Legal obligation stops at Ontario's border; funding agreements do not. IRCC can add a clause to its Contribution Agreements requiring recipient websites to meet WCAG 2.0/2.1 AA, extending the requirement to all 550 SPOs nationally without any change to legislation (Section 8, Phase 2).
- The path: Ontario pilot (Phase 1) → 550 IRCC SPOs nationally (Phase 2) → other government departments following the same approach (Channel A+, Phases 3–4) → federally regulated entities emerging as a second growth curve as the 2027–2028 ACA deadlines approach (Section 5.5).

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# 3. Solution and Product

Access Canada has completed its first development phase and is live. Core capabilities:

- **Multi-engine automated scanning**: several integrated open-source engines with our own rule mapping and review workflow, covering 11 standards tags (WCAG 2.0/2.1/2.2 A/AA/AAA, Section 508, EN 301 549, ACT, best practice) and more than 270 rules. Full-site breadth-first crawling, with violation explanations and remediation guidance.
- **AI semantic layer**: AI human-simulation scanning, quality scoring for alt text and error messaging, and AI-generated remediation suggestions have all been validated at small scale, confirming the approach works. Token costs for large language model API calls have so far prevented full production testing and deployment. This is the core investment area of the two-to-three-year product roadmap (see Section 8).
- **Human review workflow**: findings that automation cannot determine with 100% certainty — flagged as "incomplete" — are reviewed item by item by qualified auditors, with reviewer identity and timestamp recorded.

- **Formal sign-off and audit trail**: once review is complete, results can be locked and a signed record generated, providing the evidence an organization needs to demonstrate that a compliance review was carried out.
- **Client portal**: each organization logs in to view its own reports directly, removing the need to pass files back and forth by hand and the exposure and corruption risk that comes with it.
- **PDF report export**: board- and executive-level compliance documentation, generated in one step.
- **Scheduled scanning**: weekly, monthly or quarterly re-scans that track an organization's compliance position over time.
- **Data sovereignty**: database, file storage and scanning services run entirely in Canadian cloud regions (Toronto and Montreal). Nothing is stored outside the country. This aligns with the privacy and security obligations placed on funding recipients under Section 7.0 of the IRCC Contribution Agreement, and with the federal *Directive on Service and Digital*, which identifies Canadian residency as the preferred delivery option for Protected B data [5].
- Five browser-based dynamic interaction tests — keyboard accessibility, tab order, 200% zoom and related checks — are to be handled by AI within two to three years, reducing the error rate in manual review.

**Dedicated IRCC dashboard (to be built once funding is in place)**: Access Canada will develop a separate compliance dashboard for IRCC to monitor the accessibility position of every organization in its portfolio against both AODA and ACA. The dashboard shows issue counts, severity, a risk index, and progress over time. **It exposes no website code and no back-end data from any organization, preserving each organization's independence.**

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# 4. Market Opportunity (TAM / SAM / SOM)

## 4.1 TAM (Total Addressable Market)

- Roughly 61,000 registered charities nationally; non-profits and charities together exceed **170,000** organizations [6]
- Ontario has approximately **64,000** non-profits [7] (all sizes)
- The global digital accessibility software market was roughly US$800–900 million in 2025, growing at 7–10% annually and projected to reach US$1.3–2.3 billion between 2030 and 2035; North America accounts for about 40% [8]

## 4.2 SAM (Serviceable Addressable Market) — five channels

> **Channel reference table** (letter codes are used throughout; return here as needed):

| Code | Who it means | Start | In this five-year projection |
|---|---|---|---|
| **Channel A** | The 550 IRCC-funded settlement service organizations (SPOs) | Year 1 | Yes |
| **Channel A+** | Comparable non-profit networks funded by other government bodies (~3,500 organizations) | Year 3 | Yes |
| **Channel B** | Non-profits with no government funding relationship, buying on their own initiative | Year 6 | No |
| **Channel C** | Ontario commercial organizations with 20+ employees | Year 1 | Yes |
| **Channel C+** | Banks, telecoms, transportation and other entities regulated under the federal ACA | Year 6 | No |

> The letters group the channels by type: **A** covers government-funded non-profit networks, **B** the broader non-profit market buying on its own initiative, and **C** market-driven customers (commercial organizations and federally regulated entities). **Start dates are shown in each heading and do not follow the letter order** — Channels A and C both begin in Year 1.

**Channel A: the IRCC policy channel (starts Year 1 | 550 IRCC-funded settlement service organizations; the list is public and highly concentrated, so no organization-by-organization market development is required)**

- Approximately **550** IRCC-funded settlement service organizations nationally. A 2025 update puts the figure at roughly 570; this plan uses the conservative 550. The current round of funding agreements took effect **April 1, 2025**, runs for **three years**, totals over **$3.2 billion** and covers more than 520 organizations [9]
- Ontario receives the largest share of immigration in the country and has roughly **200** SPOs, the target market for the Phase 1 pilot

**Channel A+: SPO-equivalent networks funded by other government bodies (starts Year 3 | same coverage logic as Channel A, driven by other departments following IRCC's lead)**

- The logic: once IRCC has established Access Canada as a designated auditor, other government-funded settlement and community service programs follow the same approach in designating an auditor — growth driven by policy precedent
- The evidence: both Ontario and the federal government run non-profit funding networks comparable in scale to the IRCC Settlement Program. The Ontario Trillium Foundation funds more than **1,300** organizations a year [10]; Reaching Home, the federal homelessness strategy administered by Housing, Infrastructure and Communities Canada, is a nine-year, **$5 billion** program [11]. Organizations in these networks are subject to the same accessibility requirements, which makes them the direct target for Channel A+
- Scale: beyond IRCC's 550, comparable government-funded non-profit networks nationally total roughly **2,500–4,500** organizations; Section 9 uses the midpoint of **3,500**. That figure is derived upward from two verifiable Ontario government data points — the Ministry of Children, Community and Social Services (MCCSS) funds approximately **750** transfer payment recipients delivering services across 4,500 sites [12], and the Ontario Trillium Foundation funds more than **1,300** organizations a year [10] — then extrapolated nationally using Ontario's share of Canadian non-profits. Full derivation in **Appendix A-5**

**Channel B: the broader non-profit market (starts Year 6 | organizations buying on their own initiative, requiring conventional sales)**

- The portion of Ontario's 64,000 and Canada's 170,000 non-profits that hold no government funding agreement and make their own purchasing decisions
- Signing this channel at scale depends on the national delivery network and brand credibility built through Channels A and A+. Its revenue therefore enters the model from Year 6 and sits outside this five-year projection (see the long-term outlook in Section 8 and Section 13)

**Channel C: the Ontario commercial market (starts Year 1 | runs in parallel with Channel A and is counted in the financial projections from Year 1 — see Section 5.4)**

- Ontario for-profit businesses with 20 or more employees fall under the same AODA statute and the same **December 31, 2026** reporting deadline as non-profits. The market runs to tens of thousands of organizations
- Served at the Business Standard tier ($599/month), which is twice the annual value of the IRCC SPO tier. Customers arrive through the credibility of the "IRCC-designated auditor" position and word of mouth from non-profit clients, with no large marketing spend
- Counted in every financial projection in Section 9 on a conservative customer growth plan (30 customers in Year 1 rising to 450 in Year 5)

**Channel C+: the federal ACA market (starts Year 6 | annual value per customer is several times the non-profit and small business tiers — see Section 5.5)**

- Banks, telecommunications and transportation operators, broadcasters and Crown corporations must reach WCAG 2.1 AA compliance by 2027–2028 (see Section 2.3) [4]
- Customer profile, procurement process and audit depth all differ materially from the non-profit channels, requiring a separate product tier and delivery team. Revenue therefore enters the model from Year 6
- Once non-profits in the IRCC channel have reached compliance first, the demonstration effect should raise national attention on accessibility compliance and indirectly support ACA audit activity

### 4.3 SOM (Serviceable Obtainable Market)

Section 9 sets out the projections. The core assumptions:

- **Channel A (IRCC SPOs, 550 organizations)**: driven directly by the IRCC funding clause. Year 1 sign-ups depend on how firmly and broadly IRCC applies that clause, so Section 9.2 models four tiers — **40 / 60 / 80 / 100 organizations**. 100% coverage of all 550 organizations is reached in Year 3
- **Channel A+ (other government-funded organizations, roughly 3,500)**: driven by policy precedent, starting Year 3, with coverage rising in stages (approximately 10% in Year 3, 30% in Year 4, 50% in Year 5, continuing thereafter)
- **Channel C (Ontario commercial)**: counted from Year 1 on a conservative growth plan
- **One-time remediation service**: runs across all channels, counted as collected revenue from Year 1
- **Channels B and C+**: both require the national delivery network built by Channels A, A+ and C before they can scale, so they start in Year 6 — beyond this five-year window. **The revenue figures in Section 9 contain nothing from either channel**; they represent growth beyond Year 5 (see the long-term outlook in Section 8)

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## 5. Business Model and Pricing

### 5.1 Tiered SaaS subscription

| Tier | Target customer | Price | Included |
|---|---|---|---|
| Starter | Small non-profits, under 20 staff | $149/month | Core scanning + annual report |
| IRCC SPO | 20–100 staff (AODA reporting threshold) | $299/month | Scanning + human review workflow + PDF export + sign-off audit trail |
| IRCC SPO Enterprise | SPOs over 100 staff (large or multi-site) | $499/month | Everything in IRCC SPO + multi-site + scheduled scanning + dedicated account manager |
| Business Standard | Ontario **commercial** organizations, 20–100 staff (same AODA obligation) | $599/month | Everything in the IRCC SPO tier |
| Business Pro | Ontario **commercial** organizations over 100 staff (large or multi-site) | $899/month | Everything in Business Standard + multi-site + scheduled scanning + dedicated account manager |

### 5.2 IRCC channel pricing

If IRCC writes accessibility auditing into its funding terms, SPOs are priced by headcount at **$299/month** (20–100 staff) or **$499/month** (over 100 staff) — under a tenth of the annual cost of enterprise tools such as Siteimprove and Level Access (see the comparison in Section 7), at equivalent audit depth.

## 5.3 One-time remediation service (second revenue line, counted from Year 1)

The subscription covers auditing: scanning, review and sign-off. Once violations have been identified, a client can separately purchase a **one-time remediation** engagement, priced by site complexity:

| Site complexity | IRCC SPO | Commercial |
|---|---|---|
| Small to mid-size / fewer issues | From $2,999 | From $5,999 |
| Large / more issues | From $5,999 | From $8,999 |

> IRCC SPOs receive the policy-channel rate, roughly half the commercial price, consistent with the positioning set out in Section 5.2.

**Revenue model**: we estimate conservatively that about **40%** of subscribers also purchase remediation, driven by the hard AODA deadline and the general absence of in-house technical staff at non-profits (see Section 2.2). The two customer types are modelled at their respective average prices:

| Customer type | Average price | Basis |
|---|---|---|
| IRCC SPO / government-funded organization | **~$4,500** | ($2,999 + $5,999) ÷ 2 |
| Commercial organization | **~$7,500** | ($5,999 + $8,999) ÷ 2 |

**Why the attachment rate is as high as 40%.** Organizations do not subscribe in order to receive a list of problems; they subscribe in order to be compliant by December 31, 2026. The moment a scan report lists violations, the organization is on record as aware of non-compliance and not yet remediated. Under AODA section 37, a corporation faces up to $100,000 per day and its directors and officers up to $50,000 per day, pursued separately (see Section 2.1). **No organization chooses to sit on a known violation**, and non-profits and small businesses generally have no internal technical team (see Section 2.2), which rules out fixing it themselves. Remediation is therefore not an optional add-on but a necessary step to compliance. Even 40% is conservative: the remaining 60% are principally organizations constrained by the current year's budget that choose to remediate in phases across multiple years.

**Which year the revenue lands in.** Remediation revenue is recognized when the work is delivered and the client signs off. **Of the customers signed in a given year, that 40% complete and accept remediation within the same year, so the revenue is booked in that year** rather than deferred. The timing works: the product went live in Phase 0, so scanning starts as soon as a contract is signed, and the cycle from scan to identified issues to a remediation decision to delivery and acceptance averages one to four months. With the AODA deadline in front of them, organizations want the work done, not carried into the following year.

Remediation is **project revenue**, which by industry convention does not count toward ARR (Annual Recurring Revenue — the subscription revenue that recurs each year). It is nonetheless counted in full within the total collected revenue in Section 9.1, and it funds salaries and operations exactly as subscription revenue does. In Year 1 it contributes approximately **$270,000**, or 48% of the year's collected revenue.

**Who does the remediation work.** A combination of Access Canada's in-house engineering team and a group of external development firms we have vetted and certified. National remediation volume is more than our own team can absorb, so external capacity is necessary. Work completed by an external firm does not go straight to the client: our internal team reviews it first, and only then does it enter the sign-off process. Every compliance conclusion we issue is therefore signed off by Access Canada itself.

## 5.4 The commercial revenue line (Channel C, counted from Year 1)

AODA reporting obligations are not limited to non-profits. Ontario **for-profit businesses with 20 or more employees** must file the same report and face the same exposure — a market of tens of thousands of organizations. Access Canada serves it from Year 1 at the **Business Standard tier ($599/month)**, still well under a tenth of enterprise competitor pricing while carrying twice the annual value of an IRCC SPO customer.

On customer acquisition, this line carries **no significant marketing budget**. Customers come from the credibility of the "IRCC-designated auditor" position and from word of mouth among non-profit clients. Because it does not depend on paid acquisition, its customer acquisition cost is far below conventional market-driven sales.

The line is counted in every Section 9 projection on the following **conservative growth plan**:

| Year | Year 1 | Year 2 | Year 3 | Year 4 | Year 5 |
|---|---|---|---|---|---|
| **New customers in year** | 30 | 60 | 90 | 120 | 150 |
| **Year-end customers (cumulative)** | **30** | **90** | **180** | **300** | **450** |

> Subscription revenue against this plan appears in Section 9.4; remediation revenue in Section 9.5.

**How the plan was derived:**

- **The 30 customers in Year 1 come from what the sales team can actually deliver, not from a slice of total market size.** Year 1 has 8 sales and business development staff (see the headcount detail in Section 9.6), whose primary focus is signing SPOs in Channel A. Commercial customers are **not actively prospected; they approach us** — with the December 31, 2026 deadline in view, businesses search out compliance services, and non-profit clients refer them. At roughly **4** incidental closes per person per year, 8 people produce approximately **30** customers. The calculation assumes no dedicated commercial sales staff and no paid acquisition.
- **Thirty additional signings per year thereafter** (30 → 60 → 90 → 120 → 150), from two sources. First, more people: headcount grows from 17 to 50 (see Section 9.6), which increases both the sales team and the staff who serve customers after signing. Second, more inbound: the base of completed non-profit engagements grows year over year, and the credibility of the IRCC channel compounds, so inbound enquiries rise. The plan assumes no breakout growth and no large advertising spend.
- **A sanity check from the other direction**: 450 customers in Year 5 is **under 2%** of Ontario businesses subject to the requirement, and the 30 commercial customers in Year 1 combined with SPO customers total 130 — well inside the Year 1 service ceiling of 200 set in Section 9.2. There is substantial headroom and no delivery pressure.

## 5.5 Technical advantage and future revenue

**A. Purpose-built compliance AI (core technical direction, R&D from Year 1, costs already in the projections)**

Every competitor on the market today — whether UserWay's overlay script or Siteimprove's enterprise scanner — is fundamentally a **rules engine**. It can determine whether an `<img>` element has an alt attribute. It cannot determine whether that alt text actually conveys the image's meaning to a person using a screen reader. Yet a large share of WCAG 2.0 AA criteria — 1.1.1 Non-text Content, 3.3.2 Labels or Instructions, 2.4.6 Headings and Labels, 1.3.1 Info and Relationships — turn on exactly that: **a judgment about semantic quality, not a pattern match**. This is where automated tools stop across the board and fall back on human review, and it is why AI is Access Canada's core technical direction.

Four planned capability layers:

| Layer | Capability | Problem it solves | Timing |
|---|---|---|---|
| L1 | **Semantic quality scoring** | Whether alt text, error messages, form labels and link text are genuinely understandable, not merely present | Year 1–2 |
| L2 | **AI human-simulation scanning** | Simulated user interaction to detect keyboard accessibility, tab order, focus traps and other dynamic issues — the blind spot of static scanning (see Section 3) | Year 2–3 |
| L3 | **AI remediation guidance** | Not just identifying the problem, but producing context-appropriate fixes and replacement copy | Year 3–4 |
| L4 | **AI-assisted automated remediation** | Directly applicable code patches for standardized issues, delivered after human review | Year 4–5 |

**Why this is difficult to replicate.** Training a model to judge WCAG compliance does not call for general-purpose text. It calls for **large volumes of labelled data in the form: flagged issue → qualified auditor's determination → reasoning behind it**. Access Canada's human review workflow (Section 3) has been producing exactly that data since Year 1, and every sign-off adds to the training corpus. **Every day the business operates, the training data grows.** Pure software competitors have no human review step and cannot obtain this data; pure consultancies have the expertise but no product through which to accumulate it systematically. Holding both is the barrier to entry on this path.

**Effect on cost structure over time.** Once L4 matures, the remediation service's reliance on the external developer network declines and margins improve. L1 and L2 reduce both the volume and the error rate of human review, so unit audit cost falls as the customer base grows — something a purely labour-based delivery model cannot do.

**Accounting treatment.** These projections include the **engineering and compute costs** of the AI work in full (approximately $3.067 million over five years — see "Total investment in AI and compliance audit technology" in Section 9.6). **No corresponding premium revenue is counted anywhere in the projections.** Every profit figure in Section 9 is therefore already net of AI development cost, and any revenue from commercializing that capability sits entirely outside the model.

**B. Future revenue lines (third curve, entering the model from Year 6)**

- **Federal ACA market (Channel C+, see Section 4.2)**: banks, telecommunications and transportation operators regulated federally must reach WCAG 2.1 AA compliance by 2027–2028 [4], at annual values well above the non-profit tiers. The market requires a separate product tier and delivery team, and enters the model from Year 6
- **Commercializing the AI capability**: once L1 through L4 mature, they can be priced as a premium option on the IRCC SPO Enterprise and Business Pro tiers, or licensed to other accessibility service providers. This revenue is entirely outside the current projections

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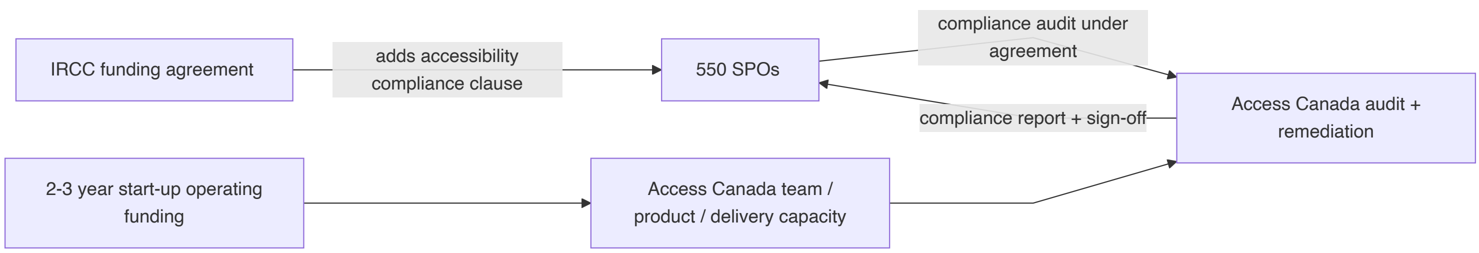
# 6. Growth Engine: The IRCC Policy Channel

**What we are proposing is a combination of capital and a policy channel, not a conventional financial investment.**




**What this delivers for IRCC:**

1. Every funded organization reaches genuine compliance inside the 2026–2028 window, at far less cost than building internal capacity or procuring enterprise tools organization by organization
2. A Canadian technology company is established, creating local employment (see Section 11)
3. Compliance data becomes visible across the entire portfolio through a single channel (the dedicated IRCC dashboard, Section 3)
4. The funding ultimately produces **a compliance-audit AI asset that stays in Canada** (approximately $3.067 million invested over five years, close to the total funding amount — see Section 9.6). The money does not disappear into operating overhead; it settles into technical capability held domestically

**What this delivers for funded organizations and small businesses: eliminating the cost and risk of trial and error**

Non-profits and small businesses typically have no internal technical staff and no way to judge which category of product actually achieves compliance. The largest segment of the market by volume is the overlay plug-in: inexpensive, and marketed as helping organizations meet accessibility requirements — but widely held in the field not to constitute genuine compliance [3]. An organization pays, installs the plug-in, and remains legally non-compliant, often finding out only when a complaint or a penalty arrives.

If IRCC sets the audit standard in its funding agreements and recognizes Access Canada as the auditor, those 550 organizations avoid three costs:

1. **The cost of selecting a vendor** — no independent research, price comparison or trialling, and no need to understand WCAG technical criteria before committing
2. **The cost of choosing wrong, and the legal exposure that follows** — no scenario in which the money is spent, the plug-in is installed, and the organization is still in breach, a loss that usually surfaces only at the point of complaint
3. **Rework from each organization figuring it out alone** — if 550 organizations each buy separately and report in different formats, IRCC cannot compare across the portfolio and organizations cannot reuse each other's work

For IRCC, this also means funding is not consumed by ineffective tools: every dollar corresponds to a verifiable compliance outcome.

The same logic applies to Ontario small businesses (Channel C). Facing the December 31, 2026 deadline, a compliance route already recognized by government and backed by precedent is the least burdensome and least error-prone option available — which is why Channel C acquires customers without significant marketing spend.

**What this delivers for Access Canada:** the compliance clause creates clear, predictable audit demand across 550 organizations, bringing customer acquisition cost close to zero and driving Channel A coverage (see Section 9).

# 7. Competitive Analysis

| | UserWay / accessiBe | Siteimprove / Level Access | Access Canada |
|---|---|---|---|
| Genuine audit depth | Low (overlay; widely held not to constitute compliance) [3] | High | High (multi-engine + human review + sign-off) |
| Pricing | $49–490/year | $5,000–50,000+/year | Non-profit $1,788–5,988/year; commercial $7,188–10,788/year |
| Affordable for a non-profit | Yes | No | Yes |
| Canadian / AODA-specialized | No | No (predominantly US firms) | Yes |
| Data held entirely in Canada | No | No | **Yes** |
| Subject to foreign jurisdiction (e.g. US CLOUD Act) | Yes | Yes | **No** |
| Compliance standard the product is built around | US ADA | US ADA | **Ontario AODA + Canadian ACA** |
| How issues are judged | Rules engine (is the attribute present) | Rules engine | **Rules engine + AI semantic judgment (is the content actually understandable)** |
| Labelled data for training compliance AI | None | None | **Produced continuously through human review, held in Canada** |

**Where the advantage lies:**

1. **Data residency is a threshold qualification, not a product feature.** A compliance audit crawls and retains an organization's page structure, content and screenshots — its operational data. Section 7.0 of the IRCC Contribution Agreement places privacy and security obligations on funding recipients, and the federal *Directive on Service and Digital* identifies Canadian residency as the preferred delivery option for Protected B data [5]; keeping data in Canada throughout is the most reliable way to satisfy both (see Section 3). Access Canada's database, file storage and scanning services all run in Canadian cloud regions. The major competitors are US companies whose data storage and disclosure fall under the US CLOUD Act: even with a Canadian node, the parent company remains obliged to produce data on a US law enforcement request. **This follows from where a company is incorporated and which courts it answers to. No competitor can resolve it by adding a product feature.**
2. **The compliance standard itself is local.** The AODA is Ontario law and the ACA is federal Canadian law; report templates, deadlines, penalty provisions and interpretation are all set by Canadian legislatures. Competitors built around the US ADA must redo rule mapping and report formats to enter the Canadian market. That localization is where Access Canada starts.
3. **A funder can write entirely neutral procurement criteria.** The funding agreement needs only two objective requirements: that the data handled remain in Canada, and that an auditable compliance report be issued against AODA / WCAG 2.0 AA. No vendor needs to be named. Suppliers meeting both criteria identify themselves, and the process withstands audit.

4. **Human review plus a sign-off audit trail.** Automated tools alone cannot produce evidence an organization can rely on externally.
5. **AI that judges whether content is understandable, not merely whether an attribute exists.** Competitors, whether overlay scripts or enterprise scanners, are rules engines: they can find an image with no alt attribute but cannot judge whether the alt text conveys the image to a screen reader user. A large share of WCAG 2.0 AA criteria turn on precisely that (see Section 5.5). Access Canada has been investing in purpose-built compliance AI since Year 1, approximately **$3.067 million** over five years (see Section 9.6), delivered in four layers: semantic quality scoring, human-simulation scanning, remediation guidance, and AI-assisted automated remediation.
6. **The data needed to train that AI exists only here.** Teaching a model to judge WCAG compliance requires not general text but large volumes of labelled examples: flagged issue, the auditor's determination, and the reasoning behind it. Access Canada's human review process (Section 3) produces this data daily, and every sign-off adds to it. **A competitor could invest the same amount in R&D and still not obtain this dataset.** As scan volume grows, the rule library, false-positive rates and industry benchmark data accumulate alongside it, and the gap widens.
7. **The AI asset stays in Canada.** Ownership of the model, the labelled corpus and the case library, along with the data itself, remains within Canada throughout (see data sovereignty, Section 3).
8. **Distribution efficiency that competitors cannot match on price.** This proposal asks IRCC to write accessibility requirements into its funding agreements (Section 6). Once that condition holds, 550 SPOs generate compliance demand in the same window, against a single audit standard, without each having to select a vendor themselves (Section 6). A foreign competitor with comparable functionality still has to negotiate one organization at a time, with no common procurement requirement to work from. The gap is in distribution, not in product features.

> **This channel is an accelerator, not a lifeline.** Section 9.2 models four tiers — **40 / 60 / 80 / 100 organizations** — according to how firmly the IRCC clause is applied. Stronger policy means a steeper curve; but even at the most conservative 40-organization tier, Year 1 collected revenue is approximately **$342,000** and the business proceeds. In parallel, Channel C generates real revenue from Year 1, driven entirely by businesses' own AODA obligations and dependent on no policy clause (Section 5.4). **IRCC's support makes this curve faster. It does not determine whether the curve exists.**

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# 8. Phased Roadmap

## Phase 0 (complete): product ready

- Multi-engine scanning, client portal, human review workflow, sign-off audit trail and PDF export are all built and live, with immediate delivery capacity
- Commercial operations begin with the Phase 1 Ontario pilot

## Phase 1 (2026 Q4 – 2027 Q4, approximately 12 months, Year 1): three revenue lines start together

- Foundations: team assembly, office and network and server infrastructure, deployment testing, staff training (concentrated in the first three months). The product went live in Phase 0, so **customer signings run in parallel with this work** rather than waiting for it to finish
- Channel A: sign IRCC-funded SPOs; volume depends on how firmly the IRCC clause is applied, modelled across four tiers of **40 / 60 / 80 / 100 organizations** (Section 9.2)
- Channel C: take on Ontario commercial AODA work in parallel, targeting **30 customers** at the $599/month tier
- Remediation: delivered as a full revenue line from Year 1, with **40%** of the year's new customers completing remediation (basis in Section 5.3)
- Use the urgency of the December 31, 2026 AODA reporting deadline as the entry point
- Headcount reaches 17 (founders, engineering and audit, remediation delivery management, finance and

administration, sales and BD — see Section 11)

## Phase 2 (calendar 2028, Year 2): the IRCC channel opens nationally

- Precondition: IRCC has implemented the clause, bringing accessibility auditing into funding agreements nationally
- Target: **350** SPO customers (full Ontario coverage plus other provinces), 90 commercial customers
- Headcount reaches 22
- Product: complete the AI dynamic interaction testing capability (tab order, keyboard traps, 200% zoom)

## Phase 3 (2029, Year 3): full IRCC coverage, Channel A+ begins

- Target: **100% coverage of all 550 IRCC SPOs**; IRCC's precedent brings other federal departments and provincial funding programs into the same approach (Channel A+, Section 4.2), reaching **10%** of that group, for **900** government-funded customers in total; 180 commercial customers
- Headcount reaches 30; remediation becomes a routine revenue line at scale
- **The business crosses into profitability this year** (Section 9.7)

## Phase 4 (Years 4–5): Channel A+ at scale

- Target: Channel A+ coverage rises to **30%** in Year 4 (1,600 government-funded customers in total) and **50%** in Year 5 (2,300); commercial customers reach 450 in Year 5
- Headcount reaches 40 in Year 4 and 50 in Year 5
- Launch the LLM semantic quality layer (human-simulation scanning, AI remediation guidance, AI-assisted automated remediation) as a differentiated premium option

## Long-term outlook (from Year 6): three additional curves

1. **Channel A+ coverage keeps rising**: on the same curve toward 70% and then 90%, which together with IRCC's 550 organizations puts subscription ARR from government channels on a path toward **$13 million+**
2. **Channel B opens commercially** (Years 6–7): of Canada's 170,000 non-profits, every 1% converted represents roughly 1,700 customers and **$6 million+** in annual revenue
3. **The federal ACA market**: banks, telecommunications and transportation entities enter a sustained procurement cycle after their 2027–2028 compliance deadlines, at annual values several times the non-profit tiers

Taken together, ARR has a credible path toward **$20–25 million** by roughly Year 8. The $11.40 million in Year 5 total revenue projected here is the conservative starting point of that curve rather than its ceiling, and actual Year 5 market performance has meaningful room to exceed this model.

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# 9. Financial Projections

> The projections below are built on the market data in Section 4 and the most conservative tiers of the pricing model in Section 5. Of the five tiers in Section 5.1, all projections use only the two base tiers — **IRCC SPO at $299/month** and **Business Standard at $599/month**. No upgrade revenue from the Starter, IRCC SPO Enterprise or Business Pro tiers is counted.

## 9.1 Funding and financial position, Years 1–5

> This section summarizes the detailed projections in 9.2 through 9.7. **All figures are cash actually collected.** ARR, a business scale indicator, is presented separately in 9.8 and enters no calculation here. The base case uses the **100-organization tier** from the Year 1 table in Section 9.2; under other tiers the annual figures adjust accordingly and the timeline shifts back.

**(1) Composition of collected revenue** — two revenue lines, both collected within the year (detail in 9.4 and 9.5):

| Year | Subscription revenue (see 9.4) | One-time remediation (see 9.5) | Total collected revenue |
|---|---|---|---|
| Year 1 | $287,220 | $270,000 | **$557,220** |
| Year 2 | $1,238,580 | $630,000 | **$1,868,580** |
| Year 3 | $3,212,880 | $1,260,000 | **$4,472,880** |
| Year 4 | $6,210,120 | $1,620,000 | **$7,830,120** |
| Year 5 | $9,692,100 | $1,710,000 | **$11,402,100** |
| **Five-year total** | **$20,640,900** | **$5,490,000** | **$26,130,900** |

> **How the two lines differ.** Subscription revenue is recurring: it continues as long as customers renew, and the installed base compounds. Remediation revenue is project-based: it applies only to customers signed that year and is never counted twice. The first underpins long-term financial sustainability; the second provides critical cash during the rapid-growth years of 1 through 4. Remediation is **48%** of Year 1 revenue, falling to **15%** by Year 5 as the subscription base accumulates — the signature of a business shifting from project-driven to subscription-driven.

**(2) Funding against financial position:**

| Year | Funding | Total collected revenue | Operating costs | Operating result (excluding funding) | Stage |
|---|---|---|---|---|---|
| Year 1 | $1,900,000 – $2,000,000 (pre-investment ahead of national rollout) | $557,000 | $2,147,000 | −$1,590,000 | Team and infrastructure build; Channels A and C and remediation all start |
| Year 2 | $1,000,000 – $1,150,000 (pre-investment for expansion) | $1,869,000 | $2,433,000 | −$564,000 | Clause implemented nationally; 350 SPOs |
| Year 3 | $0 – $500,000 (optional contingency, not a shortfall; depends on the strength of IRCC's policy) | $4,473,000 | $3,576,000 | **+$897,000** | 100% IRCC coverage across all 550 organizations; Channel A+ opens; first profitable year |
| Year 4 | $0 (funding ends) | $7,830,000 | $4,923,000 | **+$2,907,000** | Channel A+ at 30%; profit accelerating |
| Year 5 | $0 | $11,402,000 | $6,172,000 | **+$5,230,000** | Channel A+ at 50%; all three revenue lines growing |
| **Five-year total** | **$2,900,000 – $3,650,000** | **~$26,130,900** | **~$19,251,000** | **+$6,880,000** | — |

> **Total collected revenue = subscription revenue + one-time remediation revenue.** Formulas and year-by-year arithmetic in **Appendices A-1 and A-2**; the full Year 1 verification in **Appendix A-4**.
>
> **How the operating result moves**: negative in Years 1 and 2, covered by funding; positive from Year 3, with all surplus retained for the company's own development — headcount, R&D, Channel A+ expansion — and none distributed.
>
> **Funding profile**: funding is **concentrated in Years 1 and 2**, which account for more than 85% of the total. From Year 3, collected revenue substantially exceeds operating costs and the business is self-sustaining. The $0–$500,000 in Year 3 is a contingency, drawn at the funder's discretion based on actual progress in Years 1 and 2, and is not required for continued operation.

## 9.2 Year 1 revenue by policy tier

> **This table is the starting point for every projection in the plan.** Year 1 SPO sign-ups are not determined by Access Canada's sales capacity alone; they depend on **how firmly and how broadly IRCC applies the compliance clause in its funding agreements** — the more organizations signed under the new clause, the higher Year 1 revenue. Because team assembly and training occupy one to five months of the first year, we cap Year 1 service capacity at 200 organizations (non-profit and commercial combined).

**Year 1, Channel A (IRCC SPOs at $299/month):**

| Tier | SPO customers | Subscription revenue | Remediation customers (40%) | Remediation revenue (× $4,500) | Channel A total |
|---|---|---|---|---|---|
| Conservative | 40 | $71,760 | 16 | $72,000 | **$143,760** |
| Base | 60 | $107,640 | 24 | $108,000 | **$215,640** |
| Strong | 80 | $143,520 | 32 | $144,000 | **$287,520** |
| Full | 100 | $179,400 | 40 | $180,000 | **$359,400** |

> **Subscription revenue**: customers sign throughout the year rather than all at the start, so on average each contributes six months of subscription in the year they sign (basis and formula in **Appendix A-1**). **Remediation revenue** applies to 40% of customers signed (basis in Section 5.3).

**Year 1, Channel C (Ontario commercial at $599/month):** this channel is driven by businesses' own AODA obligations and **does not depend on the strength of IRCC's policy**, so the same customer count — **30** — applies across all four tiers.

| Item | Calculation | Amount |
|---|---|---|
| Customers | 8 sales/BD staff × approximately 4 incidental closes each per year (basis in Section 5.4) | **30** |
| Subscription revenue | 30 × 6 × $599 (new customers, six months average) | $107,820 |
| Remediation customers | 30 × 40% (basis in Section 5.3) | 12 |
| Remediation revenue | 12 × $7,500 (commercial average, Section 5.3) | $90,000 |
| **Channel C total** | $107,820 + $90,000 | **$197,820** |

> This figure is derived **from the sales team's actual capacity**. It assumes no dedicated commercial sales role, no paid acquisition, and no reliance on any IRCC policy measure. The full five-year plan and its derivation are in Section 5.4.

**Year 1 total revenue and funding gap:**

| Tier | Channel A (IRCC SPO) | Channel C (Ontario commercial) | Total collected | Operating costs | Funding gap |
|---|---|---|---|---|---|
| 40 organizations | $143,760 | $197,820 | **$341,580** | $2,095,000 | −$1,753,420 |
| 60 organizations | $215,640 | $197,820 | **$413,460** | $2,112,000 | −$1,698,540 |
| 80 organizations | $287,520 | $197,820 | **$485,340** | $2,130,000 | −$1,644,660 |
| 100 organizations | $359,400 | $197,820 | **$557,220** | $2,147,000 | −$1,589,780 |

> **Three notes:**
>
> 1. **Year 1 uses the same method as every subsequent year** (new customers counted at six months), with no additional first-year discount. The product completed development and went live in Phase 0 (Section 8), so signing and billing do **not** wait for the internal team and infrastructure to be finished. Staff join on a rolling basis rather than all at once, **signing and billing can begin in the second month after team assembly starts**, and delivery capacity comes online as people arrive. Year 1 signings are therefore spread evenly across the remaining 11 months, averaging six months of subscription each.
> 2. **The differences between tiers are small because Year 1 costs are predominantly fixed** — a 17-person team, a five-year office lease, and $100,000 of one-time network and server infrastructure all have to be in place before service can scale, and none of it flexes with customer count. Only cloud hosting (by customer count) and remediation subcontracting (40% of remediation revenue) vary by tier.
> 3. **The request in Section 10 is based on the most conservative 40-organization tier** (a gap of $1,753,420). If IRCC's implementation reaches the 100-organization tier, actual drawdown falls by approximately **$164,000**, which carries forward as Year 2 expansion reserve with no additional appropriation required. **The stronger IRCC's policy, the more efficiently this funding is used.**

## 9.3 Customer growth (the basis for all revenue projections)

> Customer counts only; no dollar figures. Sections 9.4 and 9.5 both take their inputs from this table. Year 1 uses the 100-organization tier from Section 9.2.

| Phase | Year | Coverage | Government-funded ($299/month) | Commercial ($599/month) | Year-end total | New in year (gov't / commercial) |
|---|---|---|---|---|---|---|
| Phase 1 | Year 1 | Channel A pilot + Channel C opens | 100 | 30 | **130** | 100 / 30 |
| Phase 2 | Year 2 | Clause implemented nationally; full Ontario coverage plus other provinces | 350 | 90 | **440** | 250 / 60 |
| Phase 3 | Year 3 | 100% IRCC coverage (550) + Channel A+ at 10% (~350) | 900 | 180 | **1,080** | 550 / 90 |
| Phase 4 | Year 4 | 550 IRCC + Channel A+ at 30% (~1,050) | 1,600 | 300 | **1,900** | 700 / 120 |
| Phase 4 | Year 5 | 550 IRCC + Channel A+ at 50% (~1,750) | 2,300 | 450 | **2,750** | 700 / 150 |

> "Government-funded" covers both Channel A (IRCC SPOs) and Channel A+ (other government-funded organizations); both sit at the $299/month tier and are shown together. Channel A+ is sized at 3,500 organizations, the midpoint of the 2,500–4,500 range (basis in Section 4.2, full derivation in **Appendix A-5**). The Channel C growth plan and its derivation are in Section 5.4.
>
> **"New in year" is the basis for remediation revenue** (Section 9.5): remediation is counted only for customers signed that year, since existing customers completed their remediation in the prior year and are never counted twice.

## 9.4 Subscription revenue collected

> **Method**: existing customers (signed by the end of the prior year) pay a full 12 months; customers signed during the year sign on a rolling basis and are counted at an average of six months. The same method applies in every year from 1 through 5. **Full formula and year-by-year arithmetic in Appendix A-1.**

| Year | Gov't-funded existing / new | Gov't revenue | Commercial existing / new | Commercial revenue | Total subscription revenue |
|---|---|---|---|---|---|
| Year 1 | 0 / 100 | $179,400 | 0 / 30 | $107,820 | **$287,220** |
| Year 2 | 100 / 250 | $807,300 | 30 / 60 | $431,280 | **$1,238,580** |
| Year 3 | 350 / 550 | $2,242,500 | 90 / 90 | $970,380 | **$3,212,880** |
| Year 4 | 900 / 700 | $4,485,000 | 180 / 120 | $1,725,120 | **$6,210,120** |
| Year 5 | 1,600 / 700 | $6,996,600 | 300 / 150 | $2,695,500 | **$9,692,100** |

## 9.5 One-time remediation revenue

> Attachment rate per Section 5.3: **40%** of customers signed that year complete remediation and the revenue is recognized within the year. Counted only for **new** customers, never repeated for existing ones (whose remediation was completed the prior year).

| Year | Gov't new | Remediation customers (40%) | Gov't revenue (× $4,500) | Commercial new | Remediation customers (40%) | Commercial revenue (× $7,500) | Total |
|---|---|---|---|---|---|---|---|
| Year 1 | 100 | 40 | $180,000 | 30 | 12 | $90,000 | **$270,000** |
| Year 2 | 250 | 100 | $450,000 | 60 | 24 | $180,000 | **$630,000** |
| Year 3 | 550 | 220 | $990,000 | 90 | 36 | $270,000 | **$1,260,000** |
| Year 4 | 700 | 280 | $1,260,000 | 120 | 48 | $360,000 | **$1,620,000** |
| Year 5 | 700 | 280 | $1,260,000 | 150 | 60 | $450,000 | **$1,710,000** |

**Calculation**: new customers × 40% (for example, Year 3 government: 550 × 40% = 220). Full formula in **Appendix A-2**.

**Basis for the 40% attachment rate** (detail in Section 5.3): under AODA section 37, an organization in breach faces up to $100,000 per day and its directors and officers a further $50,000 per day. Once a scan report lists violations, the organization is knowingly non-compliant and unremediated. Non-profits and small businesses generally have no internal technical team and cannot fix it themselves. **With the deadline approaching and penalties at that level, remediation is a necessary step to compliance rather than an optional add-on.** The 60% who do not purchase are principally organizations constrained by the current year's budget that remediate in phases across multiple years.

## 9.6 Cost projections

| Year | Headcount | Personnel | Office lease | Cloud / network / equipment | AI compute | Sales, marketing, travel | Legal and compliance | Contingency | Remediation subcontracting | Total |
|---|---|---|---|---|---|---|---|---|---|---|
| Year 1 | 17 | $1,395,000 | $85,000 | $175,000 | $5,000 | $84,000 | $40,000 | $255,000 | $108,000 | **$2,147,000** |
| Year 2 | 22 | $1,804,000 | $87,000 | $110,000 | $20,000 | $110,000 | $50,000 | — | $252,000 | **$2,433,000** |
| Year 3 | 30 | $2,490,000 | $89,000 | $228,000 | $60,000 | $140,000 | $65,000 | — | $504,000 | **$3,576,000** |
| Year 4 | 40 | $3,360,000 | $160,000 | $375,000 | $130,000 | $170,000 | $80,000 | — | $648,000 | **$4,923,000** |
| Year 5 | 50 | $4,250,000 | $200,000 | $523,000 | $220,000 | $200,000 | $95,000 | — | $684,000 | **$6,172,000** |

**Year 1 personnel detail (17 people, $1,395,000)**: CEO $130,000; CTO $120,000; IT assistant (supporting the CTO, also handling Year 2 roadmap research; junior-to-intermediate engineering benchmark) $85,000; project assistant (supporting the CEO) $55,000; finance $65,000; combined reception, administration and HR role $50,000; 2 accessibility auditors at $67,500 each, $135,000; remediation delivery and partner manager $75,000 (supporting the remediation line that starts in Year 1 per Section 5.3, responsible for managing certified development partners, assigning work and reviewing output); 8 sales/BD/junior accessibility auditors at $85,000 each, $680,000. From Year 2, hiring follows the same compensation benchmarks (senior engineer $100–150K; sales/BD $75–95K plus commission; account manager and customer success $65–80K; QA accessibility auditor $60–75K; all figures include employer costs), at a blended cost of roughly $82,000–85,000 per person. Team composition adjusts each year as Channel A+ national delivery and the commercial customer base grow, and is not itemized per person beyond Year 1.

**Remediation subcontracting** is set at **40%** of remediation revenue for the year, paid to certified partner firms (Sections 5.3 and 11). It begins in Year 1 and moves with remediation revenue: it is a cost that varies with revenue, not a fixed commitment — no sale, no cost.

**Founder compensation**: CEO $130,000 and CTO $120,000, both below the market cost of hiring separately for the same functions. The CTO carries all Year 1 technical responsibility — network architecture, DevOps, software development and systems operations — work that would typically require three to four dedicated engineers if split out, at a combined market cost above $300,000. The CEO carries all external responsibility: government relations, customer development and day-to-day operational management. Both salaries sit at the low end of the Ontario market range for senior technical and management roles ($120,000–180,000), holding down total team cost by combining functions in single roles.

**Contingency (Year 1 only, $255,000, approximately 12% of the year's budget)**: covers hiring delays, productivity loss while the team settles, delay in implementing the IRCC clause, and other start-up uncertainties specific to Year 1. From Year 2 the team and processes are stable and the line is discontinued.

**Office lease basis**: commercial leases do not scale person by person, so the model uses staged commitments rather than annual expansion. A **five-year fixed commercial lease** is signed in Year 1 for space sized to the Year 3 target team (about 30 people, roughly 3,500–4,000 sq ft at $25–30/sq ft/year). Rent is effectively flat through Years 1 to 3 apart from the 2–3% annual escalation in the lease. When headcount reaches 40 in Year 4 and 50 in Year 5, adjacent space in the same building is added (approximately 1,500 and 1,300 sq ft respectively), avoiding the cost and disruption of relocating. This structure locks rent at a low level through the cash-constrained years and defers expansion to Year 4, when the business is already profitable.

**Cloud, network and equipment basis**: four items in one line. (1) Network architecture is the office network and server infrastructure — enterprise firewall, core and access switches, wireless access points, local servers — built out in full in Year 1 alongside the lease for the security and compliance of scan and audit data, at approximately **$100,000**. From Year 2 there is no repeat capital purchase, only about $3,000 a year for maintenance and upgrades. (2) Cloud hosting covers infrastructure with major providers (Google, Microsoft, AWS), estimated at **active customers × approximately $160 per organization per year**, growing with the customer base. (3) Network services cover team broadband, telephony and core SaaS subscriptions (Microsoft 365, Zoom, Adobe), estimated at **$100 per person per month × headcount × 12**. (4) Equipment covers laptops, monitors and related one-time setup for **staff joining that year** (Apple, Lenovo and similar), at approximately **$2,000 per person**; the work involves technical operations and professional software, so equipment must meet those requirements.

**Cloud, network and equipment, year by year** (active customers = government-funded + commercial, per Section 9.3):

| Year | (1) Network build | (2) Cloud (customers × $160) | (3) Network services (headcount × $100 × 12) | (4) Equipment (new staff × $2,000) | Total |
|---|---|---|---|---|---|
| Year 1 | $100,000 (one-time build) | 130 × $160 = $20,800 | 17 × $100 × 12 = $20,400 | 17 (all new) × $2,000 = $34,000 | ≈$175,000 |
| Year 2 | $3,000 (maintenance) | 440 × $160 = $70,400 | 22 × $100 × 12 = $26,400 | 5 new × $2,000 = $10,000 | ≈$110,000 |
| Year 3 | $3,000 | 1,080 × $160 = $172,800 | 30 × $100 × 12 = $36,000 | 8 new × $2,000 = $16,000 | ≈$228,000 |
| Year 4 | $3,000 | 1,900 × $160 = $304,000 | 40 × $100 × 12 = $48,000 | 10 new × $2,000 = $20,000 | $375,000 |
| Year 5 | $3,000 | 2,750 × $160 = $440,000 | 50 × $100 × 12 = $60,000 | 10 new × $2,000 = $20,000 | ≈$523,000 |

**Why this line rises through Years 3 to 5**: almost entirely from **cloud hosting**, which is not a fixed cost but one that rises with active customers. The customer base grows from 1,080 in Year 3 to 2,750 in Year 5 — about 2.5 times — and cloud costs move with it, from $172,800 to $440,000. Network maintenance holds at $3,000 a year and items (3) and (4) grow modestly. The increase in this column is **a direct reflection of customer growth**, not cost overrun.

(Figures are the four items summed and rounded to the nearest thousand, consistent with the total column.)

**AI compute** is shown separately and covers three uses: (1) **fine-tuning and continued training** — using the labelled data accumulated through human review to train models specific to WCAG and AODA determinations; (2) **inference** — scoring alt text semantics, error message clarity and label semantics item by item; (3) **evaluation and regression** — re-running the historical case library on every model iteration to confirm accuracy has not degraded. Years 1 and 2 cover architecture and small-scale validation; from Year 3 the figure grows with the customer base and the training corpus; Years 4 and 5 correspond to the semantic quality layer going live in Phase 4 (Section 8), with call volume rising alongside the customer base. The cost is counted here, while the corresponding premium revenue is deliberately excluded from all revenue projections (Section 5.5).

### Total investment in AI and compliance audit technology

The AI compute line above covers compute alone. **The real investment in AI capability is considerably larger**, including engineering time and the labelled data produced by accessibility auditors during human review — **the latter being the irreplaceable training corpus for a purpose-built compliance model, and the hardest asset in this project to replicate**. The table below reallocates by purpose (**these are not additional costs; all of it already sits within the personnel and AI compute lines above**):

| Year | CTO (AI architecture, at 50%) | Engineering (at 80%) | Auditor data labelling (at 40%) | AI compute | Total AI investment | Share of collected revenue |
|---|---|---|---|---|---|---|
| Year 1 | $60,000 | $68,000 (1 person) | $54,000 (2 people) | $5,000 | **~$187,000** | **34%** |
| Year 2 | $60,000 | $152,000 (2 people) | $108,000 (4 people) | $20,000 | **~$340,000** | **18%** |
| Year 3 | $60,000 | $228,000 (3 people) | $216,000 (8 people) | $60,000 | **~$564,000** | 13% |
| Year 4 | $60,000 | $380,000 (5 people) | $270,000 (10 people) | $130,000 | **~$840,000** | 11% |
| Year 5 | $60,000 | $532,000 (7 people) | $324,000 (12 people) | $220,000 | **~$1,136,000** | 10% |
| **Five-year total** | — | — | — | — | **~$3,067,000** | — |

**Three things this shows:**

1. **In Years 1 and 2, all collected revenue goes into building capability; none is distributed.** The company operates at a loss in both years, with the gap covered by funding (Section 9.1), which means every dollar received has gone into operations and development. AI and compliance technology account for **34%** of Year 1 collected revenue and **18%** of Year 2; counting the technical and audit teams in full, those shares rise to **62%** and **32%**. There is no scenario in the first two years in which revenue is paid out.
2. **Five-year AI investment of approximately $3.067 million is close to the total funding requested ($2.9–3.65 million).** This public money does not disappear into operating overhead. It converts, close to dollar for dollar, into **a compliance-audit AI asset held in Canada** — the purpose-built model, the labelled corpus and the case library — with ownership and data remaining in the country throughout (data sovereignty, Section 3).
3. **The declining share of revenue reflects revenue growing faster, not investment shrinking.** In absolute terms the figure rises from $187,000 in Year 1 to $1,136,000 in Year 5, roughly sixfold, while revenue over the same period grows about twentyfold. That is the advantage of the approach: model training is a largely one-time investment, and doubling the customer base does not require doubling R&D.

**Sales, marketing and travel** is estimated at $8,000 per sales person (travel, CRM, materials; 8 people in the Year 1 base) plus general marketing. That per-person figure is **a tight assumption**: after CRM subscriptions (roughly $1,000–3,000 per person per year), what remains for field travel is limited, and it would need to rise if out-of-province visits exceed expectations. Year 3, which combines 100% coverage of all 550 SPOs with the opening of Channel A+, is the peak travel period; the line then grows with customer development and partner management activity.

## 9.7 Key conclusions

- **Year 1 is a build year, but revenue does not start from zero**: total collected revenue of approximately **$557K** (100-organization tier) from two lines — $287K in subscriptions and $270K in remediation, **remediation alone accounting for 48%** of the year — with the commercial channel also generating real revenue from Year 1. Costs of approximately $2.15M leave a gap of about **$1.59M**, covered by funding
- **The Year 2 gap narrows sharply to approximately $564K**: collected revenue rises to **$1.87M** (up 235% on Year 1), covering 77% of the year's costs
- **Year 3 is profitable**: collected revenue of **$4.47M** exceeds operating costs of $3.58M by approximately **$897K**, and no further funding is required
- **Years 4 and 5 accelerate**: Year 4 revenue of $7.83M exceeds costs of $4.92M by approximately **$2.91M**; Year 5 revenue of $11.40M exceeds costs of $6.17M by approximately **$5.23M**, giving the business clear and substantial financial independence
- **Five-year cumulative operating surplus of approximately $6.88M** (excluding funding), all retained for Channel A+ expansion, the launch of Channels B and C+, and technical development
- Funding is concentrated in the **Year 1–2 launch period** (Section 10); from Year 3 the business is profitable and no longer dependent on external support

## 9.8 Supplementary indicator: ARR

> **The figures in this section are not cash received. They enter none of the projections above and form no part of the funding request.** They are provided so reviewers can measure the business against the standard SaaS industry yardstick. Every dollar figure in Sections 9.1 through 9.7 is cash collected and is unrelated to this section.

**ARR (Annual Recurring Revenue)** is the standard scale indicator in subscription software: the subscription revenue that would be produced in a year if every customer on the books at year-end subscribed for the full year. It measures **the earning capacity accumulated by year-end**, not cash received during the year. Formula in **Appendix A-3**.

| Year | Gov't customers × $3,588 | Commercial × $7,188 | Year-end ARR | Subscription revenue collected (9.4) | Collected / ARR |
|---|---|---|---|---|---|
| Year 1 | 100 → $358,800 | 30 → $215,640 | **$574,440** | $287,220 | 50% |
| Year 2 | 350 → $1,255,800 | 90 → $646,920 | **$1,902,720** | $1,238,580 | 65% |
| Year 3 | 900 → $3,229,200 | 180 → $1,293,840 | **$4,523,040** | $3,212,880 | 71% |
| Year 4 | 1,600 → $5,740,800 | 300 → $2,156,400 | **$7,897,200** | $6,210,120 | 79% |
| Year 5 | 2,300 → $8,252,400 | 450 → $3,234,600 | **$11,487,000** | $9,692,100 | 84% |

**Why collected revenue always sits below ARR, and why the gap narrows.** Customers sign throughout the year and pay an average of six months in that year, while ARR counts twelve — so collected revenue on the new-customer portion is exactly half. Year 1 is entirely new customers with no existing base, producing the widest gap at 50%. As the existing base accumulates and contributes in full, the two converge to 84% by Year 5.

**This gap is deferred cash, not lost revenue.** What was not collected in Year 1 is realized in full in Year 2 as those customers move into the existing base: **$574,440 of Year 2 subscription revenue comes entirely from Year 1 customers** (100 government-funded at $358,800 plus 30 commercial at $215,640), requiring no new sales at all. **What the funding in Section 10 covers is this timing gap, not an operating loss.**

---

# 10. The Ask

**What this funding is: pre-investment ahead of a national rollout, not a subsidy covering losses.**

Access Canada's product is built and live (Phase 0), organizations can be signed from the day the project starts, and the business is profitable from Year 3. This request is not to prop up a business model that cannot stand on its own. It is to **build national service capacity before the revenue arrives**. Team, delivery network and infrastructure all have to be in place before the first SPO is served; their cost is concentrated in Years 1 and 2, ahead of the revenue curve. That mismatch is what the funding covers.

Based on the **cash-collected** projections in Sections 9.1 and 9.6, released against milestones:

| Stage | Range | Use of funds and basis | Milestone conditions |
|---|---|---|---|
| Year 1 (start-up pre-investment) | ~$1,900,000 – $2,000,000 | Based on the most conservative **40-organization tier** in Section 9.2: costs of $2,095,000 less collected revenue of $341,580 leaves approximately $1,753,420, plus $147,000–247,000 for payment timing (remediation invoices settle 30–60 days after acceptance) | Team of 17 in place; office lease signed; network and server infrastructure built; first SPO agreements signed |
| Year 2 (expansion pre-investment) | ~$1,000,000 – $1,150,000 | Costs of $2,433,000 less collected revenue of $1,869,000 leaves a gap of approximately $564,000; a further $436,000–586,000 to **accelerate Channel A+ and national delivery capacity** (team from 17 to 22, out-of-province delivery, engagement with other departments on policy terms). Without it, Year 2 expansion would rely on internal cash flow alone and the Year 3 milestones — full 550-organization coverage and the opening of Channel A+ — would slip to Year 4 | Clause implemented nationally; 350 SPOs; Year 1 KPIs met |
| Year 3 (optional, based on Year 2 progress) | $0 – $500,000 | Collected revenue already exceeds costs (a surplus of approximately $897,000). This is contingency, not gap funding, and is not required | Drawn only if Channel A+ progress falls materially short of plan |

**Total two-to-three-year requirement: approximately $2,900,000 – $3,650,000 CAD**, released in stages against milestones rather than as a single appropriation.

**Why $342–557K of Year 1 revenue does not reduce the size of the request.** Year 1 costs are dominated by **fixed commitments that have to be made first**: full-year salaries for a team of 17, a five-year office lease, and $100,000 of one-time network and server infrastructure. Together these are about 70% of the year's costs and none of them flex with customer count (Section 9.2). Subscription revenue, by contrast, lags naturally: customers sign throughout the year, contribute an average of six months in that year, and only reach full contribution the following year. What the funding covers is that structural gap between when capacity has to exist and when revenue arrives. From Year 2, Year 1 customers become full-year payers, collected revenue rises to approximately $1.87M and the gap narrows to about $564K. From Year 3, revenue exceeds costs by roughly $897K and no further funding is needed.

**Funding efficiency works in the funder's favour.** The Year 1 request is based on the most conservative 40-organization tier. The more firmly IRCC applies the compliance clause, the higher Year 1 revenue and the less funding actually drawn — at the 100-organization tier, drawdown falls by approximately **$164,000**, carried forward as Year 2 reserve with no additional appropriation. Funds are released against milestones, and release stops if progress does not meet them, keeping the funder's risk tightly bounded.

**The non-financial request:** incorporate web accessibility auditing to WCAG 2.0/2.1 AA as a standard clause in SPO Contribution Agreements, and designate Access Canada as the auditor.

**Return on public investment:**

| Input | Source | Five-year return |
|---|---|---|
| Capital: $2.9–3.65M (staged, milestone-based) | Funder | A Canadian technology company profitable from Year 3, with $11.40M in Year 5 revenue and a $6.88M cumulative five-year operating surplus, requiring no external capital from Year 3 onward |
| Policy: an accessibility clause in non-profit funding agreements | IRCC | 2,300 government-funded non-profits and 450 Ontario commercial organizations holding auditable compliance, saving tens of millions in compliance spending |
| — | — | Approximately 58 Canadian jobs (50 direct plus roughly 8 through the partner network) |
| — | — | A compliance-audit AI asset held in Canada (approximately $3.067M invested over five years, Section 9.6) |
| — | — | A dedicated IRCC compliance dashboard giving real-time visibility across the Settlement Program |

# 11. Team and Organization

**Five-year headcount and job creation:**

| Stage | Headcount | Roles added |
|---|---|---|
| Year 1 | 17 | CEO and CTO (founders); IT assistant (also engineering) ×1; project assistant ×1; finance ×1; combined administration and HR ×1; accessibility auditors ×2; remediation delivery and partner manager ×1; sales/BD/junior accessibility auditors ×8 |
| Year 2 | 22 | Engineer ×1 (AI dynamic testing); accessibility auditors to 4; customer service managers ×2 — supporting full Ontario coverage and the national rollout |
| Year 3 | 30 | Engineering to 3 (AI analysis); auditors to 8; expanded customer service and remediation delivery — supporting 100% coverage of all 550 SPOs and the opening of Channel A+ |
| Year 4 | 40 | Audit delivery, account management and partner management for Channel A+ national expansion; a dedicated customer service group for the commercial line |
| Year 5 | 50 | Engineering and delivery for Channel A+ at 50% coverage and the semantic quality layer going live; early market and product teams for Channels B and C+ |

**Beyond direct hiring, this supports Canadian IT firms.** Remediation is not delivered entirely in-house. It goes in part to a group of vetted, certified Canadian development firms (Section 5.3), which receive **40%** of remediation revenue directly. That amount grows each year:

| Year | Paid to Canadian development firms |
|---|---|
| Year 1 | ~**$108,000** |
| Year 2 | ~**$250,000** |
| Year 3 | ~**$500,000** |
| Year 4 | ~**$650,000** |
| Year 5 | ~**$680,000** |

At the blended IT cost used throughout this plan (approximately $85,000 per year, Section 9.6), the Year 5 figure supports roughly **8 full-time positions** inside Canadian IT firms, and it continues to grow with remediation volume. These jobs sit outside the 50-person headcount in the five-year plan above; they are additional employment the project generates.

For IRCC, a single funding decision produces **50 direct technology and compliance jobs plus approximately 8 full-time positions across the partner network** — about **58 Canadian jobs** over five years — serving IRCC's own funded network directly.

## 12. Risks and Mitigation

| Risk | Impact | Mitigation |
|---|---|---|
| The IRCC clause is not implemented as expected (administrative delay) | Channel A coverage falls short; revenue is deferred | Phase 1 validates the Ontario market-driven sales path independently of any policy clause |
| Year 1 SPO sign-ups fall below expectations | Lower Year 1 revenue; higher funding drawdown | Section 9.2 already models **40 / 60 / 80 / 100 organizations** separately, and the Section 10 request is based on the most conservative 40-organization tier. Even at the lowest tier the funding plan holds and no additional appropriation is required |
| Fewer inbound commercial customers than projected | Lower commercial subscription and remediation revenue in Years 1–5 | The channel curve is deliberately conservative (450 customers in Year 5 is under 2% of Ontario businesses subject to the requirement) and carries no paid acquisition, so a shortfall means only forgone new revenue, not wasted marketing spend. Any gap can be offset by expanding Channel A+ coverage earlier |
| Remediation attachment falls below 40% | Lower one-time revenue; wider Year 1–2 gap | Remediation delivery cost is 40% of remediation revenue, paid to external development firms — **if customers do not buy, the cost is not incurred**. A lower attachment rate therefore reduces only the remaining 60% net margin. **There is no scenario in which the revenue disappears while the cost remains**, and no additional funding is needed to absorb it |

## 13. Long-Term Value and Sustainability

This is start-up capital in service of a policy objective. Its long-term value takes three forms:

1. **Social value that widens each year, beyond the Settlement Program alone.** Years 1 to 3 cover the 550 IRCC-funded settlement organizations; from Year 3 the reach extends to non-profit networks funded by other government bodies (Channel A+) alongside Ontario commercial organizations (Channel C), reaching approximately **2,750** organizations by Year 5 (Section 9.3). For government, what falls is not only the legal and reputational exposure of the Settlement Program but the compliance exposure of **the entire government-funded non-profit service system**. For the public, the people who depend on these organizations — persons with disabilities, newcomers, older adults — can actually use the websites.
2. **Fiscal sustainability.** The business is profitable from Year 3 and fully self-supporting, making this a one-time start-up investment rather than an ongoing subsidy. Further, the company this capital builds is not one that can survive only on government contracts: Channel C generates real revenue from Year 1 and is already counted in these projections, demonstrating that the product sells on its own merits. The existence of Channel B — Canada's 170,000 non-profits (Section 4.2) — and the federal ACA market means this start-up capital seeds a Canadian technology company able to serve the entire non-profit sector and the commercial market, operating independently of government funding.
3. **Optional longer-term paths** (for IRCC's consideration; not conditions of this proposal):
   - IRCC retains the option to standardize this capability and fold it into broader federal digital inclusion policy
   - If the business demonstrates the scale potential of the national and federal ACA markets, bringing in additional institutional investors for commercial expansion is not ruled out

## 14. Closing

Thank you for reviewing this proposal.

Accessibility is not an add-on requirement. It is the precondition for every Canadian to reach public services on equal terms. The 550 settlement organizations IRCC funds serve, by definition, large numbers of people who do not yet speak the language, have recently arrived, and depend on digital channels for information — and among them are people with disabilities. Making those organizations' websites genuinely usable serves precisely the people IRCC's mandate is directed at.

## Appendix A: Formulas and Verification

> This appendix sets out the formulas, year-by-year arithmetic and market estimation derivations behind every projection in Section 9, for verification. Reference numbers (A-1 through A-5) are cited at the relevant points in the main text.
>
> All inputs come from the customer growth table in Section 9.3. There are no other unstated assumptions.

### A-1 Subscription revenue collected

**Formula**

```
Subscription revenue = existing customers × 12 months × monthly price
                     + new customers in year × 6 months × monthly price

Monthly price: IRCC SPO $299 / commercial $599 (calculated separately, then summed)
```

**Why new customers are counted at six months.** Customers sign throughout the year rather than all at the start: a January signing pays 12 months in that year, a July signing 6, a December signing 1. Spread evenly across a full year, the average contribution is about **6.5 months**, and this model conservatively uses **6**. Existing customers — signed by the end of the prior year — pay the full **12**. The same method applies from Year 1 through Year 5 with no first-year discount: the product went live in Phase 0, staff join on a rolling basis, and Year 1 signing and billing begin in the second month after team assembly starts, spread evenly across the remaining 11 months — an average of exactly 6 months.

**Year by year** (matching the table in Section 9.4)

| Year | Government-funded | Commercial | Total |
|---|---|---|---|
| Year 1 | 100×6×$299 = $179,400 | 30×6×$599 = $107,820 | **$287,220** |
| Year 2 | (100×12 + 250×6)×$299 = $807,300 | (30×12 + 60×6)×$599 = $431,280 | **$1,238,580** |
| Year 3 | (350×12 + 550×6)×$299 = $2,242,500 | (90×12 + 90×6)×$599 = $970,380 | **$3,212,880** |
| Year 4 | (900×12 + 700×6)×$299 = $4,485,000 | (180×12 + 120×6)×$599 = $1,725,120 | **$6,210,120** |
| Year 5 | (1,600×12 + 700×6)×$299 = $6,996,600 | (300×12 + 150×6)×$599 = $2,695,500 | **$9,692,100** |

> This is an annual-average model, sufficient for a funding requirement projection; it does not schedule month by month.

## A-2 One-time remediation revenue

**Formula**

```
Remediation revenue = new customers in year × 40% × average remediation price

Average price: IRCC SPO $4,500 = ($2,999 + $5,999) ÷ 2
               Commercial   $7,500 = ($5,999 + $8,999) ÷ 2
```

**Two rules**: (1) a 40% attachment rate, with the work signed, delivered and recognized within the same year (basis in Section 5.3); (2) counted only for **customers signed that year**, never repeated for existing customers, whose remediation was completed the prior year.

**Year by year** (matching the table in Section 9.5)

| Year | Government-funded | Commercial | Total |
|---|---|---|---|
| Year 1 | 100×40% = 40 × $4,500 = $180,000 | 30×40% = 12 × $7,500 = $90,000 | **$270,000** |
| Year 2 | 250×40% = 100 × $4,500 = $450,000 | 60×40% = 24 × $7,500 = $180,000 | **$630,000** |
| Year 3 | 550×40% = 220 × $4,500 = $990,000 | 90×40% = 36 × $7,500 = $270,000 | **$1,260,000** |
| Year 4 | 700×40% = 280 × $4,500 = $1,260,000 | 120×40% = 48 × $7,500 = $360,000 | **$1,620,000** |
| Year 5 | 700×40% = 280 × $4,500 = $1,260,000 | 150×40% = 60 × $7,500 = $450,000 | **$1,710,000** |

## A-3 ARR — supplementary indicator

**Formula**

```
Year-end ARR = year-end subscription customers × 12 months × monthly price
             = government-funded customers × $3,588 + commercial customers × $7,188
```

> **This indicator enters no cash projection and forms no part of the funding request.** It exists only to measure business scale against the standard SaaS yardstick (Section 9.8).

## A-4 Total revenue verification (Year 1, full tier)

Corresponding to the **$557,000** shown for Year 1 in the Section 9.1 summary:

```
Subscription   Gov't      : existing 0 × 12 × $299 + new 100 × 6 × $299 = $179,400
               Commercial : existing 0 × 12 × $599 + new  30 × 6 × $599 = $107,820
                                                                        ─────────
                                                                         $287,220

Remediation    Gov't      : 100 × 40% = 40 × $4,500 = $180,000
               Commercial :  30 × 40% = 12 × $7,500 =  $90,000
                                                     ─────────
                                                      $270,000

Total collected = $287,220 + $270,000 = $557,220 ≈ $557,000
```

> Year 1 is the first year with no existing customers, so both `×12` terms are zero. Customer counts: 100 from the full tier in Section 9.2, 30 from the commercial growth plan in Section 5.4.
>
> Other years follow the same steps using the arithmetic in A-1 and A-2; results appear in the Section 9.1 summary.

---

## A-5 Channel A+ target size (deriving the 2,500–4,500 range)

Neither the federal government nor the provinces publish a count of non-profits receiving recurring government funding. This estimate therefore **works upward from two Ontario funding networks with published official figures**, using no second-hand estimates from research firms.

**Step 1: two Ontario funding networks with official figures**

| Funder | Organizations funded | Source |
|---|---|---|
| Ministry of Children, Community and Social Services (MCCSS) | Approximately **750** (across 4,500 sites) | Ontario government annual report [12] |
| Ontario Trillium Foundation | More than **1,300** a year | OTF annual report [10] |
| Total (before de-duplication) | **2,050** | — |

**Step 2: de-duplication**

An organization may receive funding from both MCCSS and OTF, so the two lists overlap. No cross-referenced list is published, so we apply a conservative overlap of **25% to 30%**:

```
Ontario organizations = 2,050 × (1 − 30%~25%) ≈ 1,430 ~ 1,540
This estimate takes the lower bound: 1,430
```

**Step 3: extrapolation to the national level**

Using the two non-profit population figures already cited in Section 4.1 as the allocation basis — Ontario at approximately **64,000** [7] and Canada at more than **170,000** [6], an Ontario share of **37.6%**:

```
National government-funded non-profits ≈ 1,430 ÷ 37.6% ≈ 3,800
Less the 550 IRCC SPOs already counted in Channel A [^7]
Channel A+ target ≈ 3,800 − 550 ≈ 3,250
```

### Step 4: the range

This derivation covers only two Ontario funders, excluding federal programs (Reaching Home alone has supported more than 7,200 projects since 2019 [11]) and every other province, so it systematically understates. At the same time, the overlap rate and the provincial distribution are both assumptions and could overstate. We therefore apply approximately **±30%** to the midpoint of 3,250 and round to the nearest 500:

```
2,500 (conservative floor) ~ 4,500 (optimistic ceiling)
All projections in Section 9 use the midpoint of 3,500
```

---

# Appendix B: Sources

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1. *Accessibility for Ontarians with Disabilities Act, 2005* (official current e-Laws version): Ontario.ca – Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 ↩ ↩

2. AODA penalties and reporting deadline: Ontario.ca – Completing your accessibility compliance report; Ontario.ca – Accessibility compliance and enforcement report ↩

3. Competitor pricing (UserWay / accessiBe / Siteimprove / Level Access): compiled from Tekpon, CheckThat.ai, AccessibilityChecker.org and comparable industry review sites, 2026 data. (Commercial software pricing; no Canadian government statistics exist on this and no official source is available as a substitute.) ↩ ↩ ↩ ↩

4. *Accessible Canada Act* scope and 2027–2028 deadlines: Canada.ca – Summary of the Accessible Canada Act; Canada.ca – Guidance on the Accessible Canada Regulations: Digital Technologies Phase 1 ↩ ↩ ↩ ↩

5. Federal data residency requirements and funding agreement privacy obligations: Treasury Board of Canada Secretariat – Directive on Service and Digital (section 4.4.3 data residency, identifying Canadian residency as the preferred delivery option for Protected B data); Direction for Electronic Data Residency (BT22-210/2018E-PDF; Protected B, Protected C and Classified data must reside in government-approved data centres within Canada); Government of Canada White Paper: Data Sovereignty and Public Cloud. Section 7.0 (Privacy and Security) of the IRCC Contribution Agreement requires funding recipients to hold client personal information in confidence, subject to the *Privacy Act*, PIPEDA and applicable provincial privacy legislation. ↩ ↩

6. National non-profit and charity counts: Canada Revenue Agency – List of charities (official searchable database; the registered charity total can be verified directly). (Government does not publish a combined "non-profits plus charities" total; that figure is a widely used industry estimate.) ↩ ↩

7. Ontario non-profit count: Ontario Nonprofit Network – About ONN. (Sector association data; neither the federal nor the Ontario government publishes an official provincial count, and no government source is available as a substitute.) ↩ ↩

8. Global digital accessibility software market size: Precedence Research. (Market research data; the Canadian government publishes no official statistics on software market size and no government source is available as a substitute.) ↩

9. IRCC SPO counts and funding scale (planned 2025–26 spending of approximately $1.125 billion, including roughly $95 million for francophone minority communities; the current agreements took effect April 1, 2025, run three years, total over $3.2 billion, cover more than 520 organizations across 802 signed agreements; SPO counts were 550+ in the 2023–24 statistics and updated to approximately 570 in 2025, excluding Quebec): Canada.ca – IRCC Minister Transition Binder 2025: Canada's Approach to Settlement and Integration of Immigrants and Refugees; Canada.ca – About IRCC settlement and resettlement services; Canada.ca – Canada invests in services to support economic integration (July 2025) ↩

10. Ontario Trillium Foundation annual grantee count (1,300+): OTF – Annual Reports and Financial Statements. (OTF is an agency of the Government of Ontario; its annual report is tabled with the Ontario legislature.) ↩ ↩ ↩

11. Reaching Home (Housing, Infrastructure and Communities Canada; national homelessness strategy) funding scale: Housing, Infrastructure and Communities Canada – Homelessness Programs ↩ ↩

12. MCCSS transfer payment recipient count: Ontario.ca – Published plans and annual reports 2024–2025: Ministry of Children, Community and Social Services. (Official Ontario government annual report; the original wording is "The ministry partners with approximately 750 transfer payment recipients that deliver MCCSS-funded programs and services across 4,500 sites".) ↩ ↩