



**ONTARIO PUBLIC
SCHOOL BOARDS'
ASSOCIATION**

Leading Education's Advocates

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To: The Honourable Mitzie Hunter
Minister of Education

Re: Education Accessibility Standard Engagement

The Ontario Public School Boards' Association (OPSBA) is pleased to provide feedback to the Ministry of Education on the initial engagement for the development of an Accessibility Standard for Education.

OPSBA and its member school boards are committed to supporting and meeting the objectives and requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) with its goal of an accessible Ontario by 2025. Our beliefs are founded on the idea that improving student achievement and student engagement is directly linked to ensuring that we work collaboratively for the social, emotional, mental and physical well-being of all children and youth. As always, we recognize that school boards must be safe, inclusive and welcoming places, not only for our students and families but the entire school community. Students and staff are entitled to a safe learning and working environment.

We solicited the feedback and opinions of trustees and staff from our member boards to the consultation questions provided in the *Engagement Guide for the Development of an Accessibility Standard for Education*. Please note that the timing of this broad and important consultation was not ideal for the education sector as May and June are extremely busy months.

General responses and recommendations are identified below.

Theme #1 – Accessibility Awareness and Training

What could schools do to improve their awareness and consideration of the accessibility needs of persons with disabilities?

There are many ways OPSBA and our member school boards improve awareness and consideration of the accessibility needs of persons with disabilities. For instance, OPSBA has proudly collaborated with sector partners on a variety of accessibility training initiatives since 2005, with the goal of improving awareness of the accessibility needs of persons with disabilities, including students, staff and community members. OPSBA regularly encourages our member boards to make use of these resources as they train staff and volunteers. Some of the projects we have produced are described in detail in the answer to the following question.

At the school board level, accessibility resources are made available at various locations, including schools, administrative offices and on school and board websites. Staff and volunteers are regularly trained on the AODA and applicable board policies and procedures, as required under the Accessible Customer Service Standard. School boards, and OPSBA, provide accessible materials/communications on request to respond broadly to accessibility needs, and thus inform future development of materials and processes.

Within the classroom, inclusiveness and awareness of others' needs is demonstrated. Rather than being a direct curriculum topic, this tends to be more of an approach and philosophy that is embedded in classroom practice. Speakers and researchers are brought in for both administration and teacher learning and community events are planned for parents to expand their understanding.

School boards also continue to work to foster understanding that accessibility at schools needs to extend beyond students and staff to include the experiences of parents, caregivers and siblings at school events. Our partners in schools and community hubs, including child care providers, must be aware of required needs and provide accommodations when requested.

Through the use of the exemplary resources noted throughout this document, accessibility awareness can be enhanced throughout a school community.

What resources or policies have you seen as most effective to support awareness of accessibility needs in schools?

School Boards and Accessibility Awareness

OPSBA member boards work to ensure broad-based committees update mandated Multi-Year Plans for Accessibility and that board staff are readily available to address accessibility issues, e.g. providing facilities-related contacts for environmental accessibility inquires.

Some boards produce their own resources that are used to support accessibility and staff awareness of AODA requirements. In addition, other resources and policies include school board accessible customer service policies and service animal procedures.

School boards work in conjunction with consulting professionals, including occupational therapists, physical therapists and vision resource staff who help to raise awareness of the physical needs of students, their capabilities and the resources they require, both in the built environment and otherwise, that need to be in place for students to access the curriculum as fully as possible.

OPSBA and Accessibility Awareness

OPSBA has long been involved in the creation of effective accessibility training and awareness initiatives for school boards.

In 2009, the Ontario Education Services Corporation (OESC), of which OPSBA is a partner member, partnered with the Accessibility Directorate of Ontario (ADO) in an EnAbling Change Project to develop resources to assist school boards with meeting the requirements of the AODA Customer Service standard. The document and website *Accessible Ontario - Customer Service: A Guide for School Boards* was developed using the combined expertise from senior officials in school boards and staff from the ADO. They ensured that the documents were practical, timely and useful. The Guide contains exemplar policies and procedures accompanied by explanatory notes, definitions and useful hyperlinks.

In 2012-13, to effectively support school board compliance with the AODA, OPSBA collaborated with the other three school board/trustee associations and the ADO on the development of The TeachAble Project – theteachableproject.org. This comprehensive website, enlivened with videos featuring staff and students from many Ontario schools, was designed to support boards in incorporating concepts of accessibility in the learning and teaching environment.

Most recently, in November 2017, OPSBA, along with the Ontario Student Trustees' Association – l'Association des élèves conseillers et conseillères de l'Ontario (OSTA-AECO) and the ADO, was pleased to present a video titled [By Any Measure](#). Tracy MacCharles, Minister Responsible for Accessibility, attended the launch of the video in Toronto. The video showcases successful student and staff-led initiatives that are making accessibility integral to school culture in Ontario. It is designed to promote accessibility awareness and inspire students to take part in Ontario's commitment to being fully accessible by 2025.

OPSBA has also collaborated with an Accessibility Working Group of school boards in southwestern Ontario to develop sample policies and procedures to assist school boards in implementing various requirements of the Integrated Accessibility Standards Regulation (IASR).

AccessForward.ca, developed by Learnography, has also been instrumental in providing training for school boards on accessible customer service and the requirements of the five standards contained under the IASR.

OESC and OPSBA have received much positive feedback about these resources and some school boards continue to use the original *Guide for School Boards*. Other boards have developed their own training resources, often based on information contained within the OESC training modules and resources.

OPSBA staff are trained on the requirements of the IASR and are always looking for new ways to promote accessibility awareness to our member boards.

Theme #2 – Awareness of Accessibility Accommodations – Policies, Processes, and Programs/Supports

What challenges do students with disabilities face when accessing supports, programs, or services in their school?

Through the ongoing development of programs, supports, service and resources to ensure all students feel safe, valued, respected and included, every effort is made by school boards to maximize the opportunity for our students to engage in learning. However, there may be times a student feels discriminated against due to visible, invisible, real or perceived disabilities. For example, in attempts to accommodate a student with a learning disability with an assistive technology device, the student may feel stigmatized and not want to use the device because that would highlight their need for support, especially in adolescence.

School boards receive and respond to accommodation requests in a timely manner to ensure students have access to the appropriate supports and resources. Individual student need is at the centre of accommodations to prevent and remove barriers to allow for access and inclusion. Planning takes place in collaboration with parents, school teams, itinerant teachers and outside agencies. However, financial constraints can pose a challenge with regard to the accommodations that schools are able to provide. While our member boards are often fortunate in having many resources to support students with accessibility needs, there is always a need to revisit supports for those students with the highest and most complex needs.

Significant challenges do exist in putting physical supports in place in a timely manner when accessing external service providers. Recommended equipment is often very specific in nature and has long delivery or installation timeframes. While significant progress has been made in reducing approval times, staff and students are often left to manage with an ad hoc set up during the wait time. For example, one school board response noted that wheelchair accessible buses continue to be in short supply, especially at peak usage times. This forces schools to ask

parents to transport their children to school so they can attend a trip that requires an early morning bus.

Many of our facilities are quite old, leading to some accessibility renovations being cost prohibitive or impossible to implement. These facilities can also cause space accommodation issues for third party providers.

We look forward to the continued consultation regarding the Special Needs Strategy and the accompanying Coordinated Service Planning and Integrated Rehabilitation initiatives to better support students and families who are trying to access services through community agencies.

In your experience, what resources, tools, or policies are most effective to promote better awareness of available supports and facilitate appropriate accommodations?

- Existing OPSBA/OESC resources
- Legislation including the AODA and the Ontario Building Code
- Individual board policies and procedures available in accessible format online and in schools – including Individual Education Plan (IEP), Identification, Placement and Review Committee (IPRC), Service Animal procedure and Multi-Year Plans for Accessibility
- Specialized board staff (including Educational Assistants, Special Education Resource Teachers, and Facilities Services staff), Ministry of Education staff and community members, e.g. CNIB representatives
- Ontario Regulation 181/98 – Identification and Placement of Exceptional Pupils
- Establishing a collaborative team with members from facilities, Special Education, and transportation departments, with occasional support from dedicated staff from business, finance and operations teams can lead to a coherent approach in meeting the needs of students with accessibility needs. Monthly meetings allow team decision-making in the best interest of the student and significant reduction in decision-making and approval timeframes.
- Posters in schools, information posted on the school, board and community health partners' website, online parent portals, or Facebook pages, and/or providing regular information in school messaging to parents can help inform and educate school communities

Theme #3 – Information, Communication, and Inclusive Decision-Making

What barriers do students with disabilities or their parents face in participating in decisions that affect accessibility in their schools?

When students move from elementary to secondary school, transition meetings between school staff and parents are key. Parents are also involved in the process of selecting appropriate accessibility/accommodation options but options may be limited in some cases due to financial constraints and structure or age of some buildings. Challenges may be more evident for new students and it can take time to develop appropriate programming and complete required retrofits to ensure an accessible and inclusive school environment. This is generally of greater concern in older buildings where universal design principles were not included at the time of construction.

As previously noted, there can be challenges when it comes to accessing multi-partner services for families. Boards do have partnership agreements that are very successful, but at times, service wait lists are challenging for families. One example provided was that sign language interpreters or accessible note-takers are not always immediately available. Wait lists can be of particular concern in Northern Ontario and other rural and remote areas where there is a lack of sufficient community based supports and services.

School board plans take into account accessibility requirements as per the AODA compliance timelines. In some cases, there are schools that, due to the multi-levels in the building and timing of construction, would not necessarily meet current standards. However, these schools can be retrofitted accordingly with additional, adequate funding to truly provide accessible environments. In new builds, architects and planners are very cognizant of and responsive to accessibility standards.

In your experience, what resources, tools, or policies help to promote early engagement by persons with disabilities (or their representatives) in educational decisions and planning?

Communication or referral from a support agency before student registration contributes greatly to a board's ability to receive and accommodate a new student with disabilities when they begin to attend school. Similarly, early communication of student needs and challenges to the school administration, which is in turn communicated to board consultant and resource staff, assists boards in being able to provide necessary supports in a timely fashion.

More work needs to be done at the child care to JK/SK transition point as parents are often not aware of available educational supports for children with disabilities.

Additional resources, tools and policies that can help promote early engagement include:

- Special Education Plans
- The AODA and the Ontario Building Code
- Ontario Human Rights Commission policies and guidelines
- Board policies and procedures (service animal/accessible customer service/support person regulations and procedures, calming room procedure)
- IEPs and IPRCs
- Human resources at the school and board level
- Community partners and social services for early registration into Kindergarten
- Transition plans for parents/students and school visits before attending school
- Parental involvement in support and safety plans for school and busing
- Regular school/home communication between educators and home through variety of methods, e.g. Google Docs, Seesaw, Education Assistant support, which encourages independence and skill building
- Creating learning environments in which educators value and program through the use of student voice
- Strong input from students with special needs on student councils and student senates
- Learning coaches supporting educators and students

Theme #4 – Transition Planning

What challenges do students with disabilities face in transitioning across educational institutions or when completing programs that bridge partner institutions?

School board and school-based staff consider and investigate different options for students transitioning to other institutions. Most students have a clear pathway and are involved with school staff to assist them with planning their future direction. Students with disabilities may have complex needs that require schools and boards to provide additional resources in order for the students to have a clear direction prior to and after graduation.

The Provincial Advocate for Children and Youth’s 2016 report *We Have Something to Say* speaks to these issues at length, with many student voices noting transitions within school boards can be hard:

“They found the transition from elementary to high school especially difficult, as one-on-one supports often disappeared, leaving them particularly vulnerable and often fearful. High schools

were far larger than elementary schools and difficult to initiate, putting students with special needs at greater risk for being isolated and marginalized.”

(<https://provincialadvocate.on.ca/documents/en/We-Have-Something-To-Say-Report-EN.pdf>, page 110)

This report contains a number of relevant recommendations and should be read by all stakeholders involved in the development of an Education Accessibility Standard.

Sometimes, when students transition from one school board to another, students may or may not come with an IEP, IPRC, or updated assessment information. In addition, requirements and prerequisites for post-secondary accessible student centres may vary from institution to institution. An example would be the entry requirements for Durham College’s “Community Integration Through Cooperative Education” (CICE) program, which differ from other neighbouring college programs. In some cases, students that should be able to access these programs cannot due to their academic history. The entry requirements for these programs are not always commensurate with the need to provide a suitable pathway for students.

With regards to making physical retrofits to a building to accommodate an accessibility need, the timing to put supports in place can be insufficient when students transition mid-year, or if the needs are not known prior to the students’ arrival. Sometimes a facility may simply be too old to allow for suitable retrofits.

What challenges do students with disabilities face when planning for employment, for post-secondary education or training, or for community living?

Schools often work with the community to transition students outside of education and students/parents are regularly consulted regarding what path they would like to take after secondary school. Developing partnerships with organizations who come into the school to assist with determining the students’ needs can help.

Students with disabilities can face numerous challenges when attempting to navigate society. In 2015, Statistics Canada provided statistics from 2011 showing the employment rate for disabled Canadians was 49 per cent, compared with 79 per cent among the general population.

(<http://www.statcan.gc.ca/pub/75-006-x/2014001/article/14115-eng.htm>)

There remains a lack of available programs in both college and university that meet the students where they are and support their growth. There is a definite gap in college programming for students graduating from vocational schools.

Students may be hesitant to disclose disability out of fear of discrimination, and/or lack of general knowledge and financial supports available for those with disabilities. Students in rural communities may face geographical and financial challenges when accessing appropriate services. Educational institutions address and support those with severe and/or visible disabilities; however, there may be room for improvement for addressing disabilities which are less severe and/or non-visible. Some individuals with less severe or non-visible disabilities can

succeed without accommodation but may not reach their full potential due to lack of services, accommodations, and financial support.

Job applications can also provide a barrier for students with disabilities. As processes move online, there is a need to ensure that web-based applications do not limit people with disabilities' access to the application process. Under Ontario's Employment Accessibility Standard, every employer shall notify the public about the availability of accommodation for applicants with disabilities in its recruitment processes.

Physical accessibility can also be an issue within workplaces. For example, countertops or desks could be too high if a worker is in a wheelchair.

One responding member board has a "Transition Advisory Group" committee, consisting of a variety of stakeholders, and much of the dialogue during their meetings centres on employment and training. This same board has a Community Work Education Coordinator who facilitates non-credit work experience for students with special needs. This position is important and in some school boards, there are larger teams supporting this endeavour. The size of the team is based on board enrolment.

Partnerships that take students into the community before graduation have proven effective at assisting those with disabilities who are transitioning out of high school. Often, Specialist High Skills Majors programs or co-op placements can turn into full-time employment and/or apprenticeships.

The cancellation of after-21 programs for developmentally disabled students and students with complex needs was a significant loss to students and their families. These programs recognized the need for specialized transitioning for certain students.

Finally, the recently announced Access Talent: Ontario's Employment Strategy for People with Disabilities has the potential to make a major positive impact, as Minister MacCharles states in her preamble to the strategy, "If every business in Ontario with 20 or more employees hires at least one more person with a disability, about 56,000 people with disabilities looking for work will gain employment and have the opportunity to help further build and enrich our businesses and economy."

In your experience, as a student, parent, or professional, what resources, tools, or policies have been effective to support smooth transitions?

Resources, tools and policies that can be effective in supporting smooth transitions include:

- The IEP/IPRC process, community agencies, board staff, Special Education Advisory Committees (SEACs), societies and charities (e.g. CNIB, Autism Canada, Canadian Down Syndrome Society)

- Alternative learning programs for disengaged students, programs that actively reach out to students who have left school
- PPM 156 – Supporting Transitions for Students with Special Education Needs

Transition planning should include the following:

- Parent/school staff meetings at key transition points (child care to kindergarten, elementary to secondary);
- Guidance and special education departments and facilities services;
- Consideration given to navigating a new building, building relationships, finding accessible entries and washroom facilities. Strong and thorough transition plans should minimize these barriers;
- Change in transportation needs (as required);
- Adequate time for teachers and support staff to understand the needs of the learners; and;
- A choice of the best programming for a student’s needs.

Theme #5 – Inclusive and Accessible Learning Spaces

What challenges do students, instructors, staff and the public with disabilities face in navigating their educational built environment?

While many school buildings are fully accessible and school boards are fully committed to meeting the requirement to be fully accessible by 2025, there are older sites that remain only partially barrier free. This means that while students can always be accommodated, it may not be at their neighbourhood school or the school of their choice. Staff may be limited in their choice of employment location. Visitors, family members, speakers or invited guests may not be able to fully access the building when attending events. Moreover, persons with temporary or long-term accessibility restrictions due to illness or injury may have difficulty continuing to attend or work at their current location. Every attempt is made to accommodate as much as possible, but full compliance, with current funding, may not be achievable.

Some boards are fortunate in being able to flexibly respond to needs through their Facilities departments. Again, in some cases, the age of the building and time of construction will impact access in certain cases. However, alternative accommodations are always implemented to remove barriers.

Some additional issues are building size and traveling distances within schools. To be future-oriented, there should be some thought given and ideas generated on how to plan schools to minimize the traveling distance for students and staff with physical challenges. As well, it is

important to think about leaving empty flexible space within new builds to allow for accessibility accommodations.

The main barrier to constructing accessible environments is having enough funding to make the buildings accessible for all. These design features should be a part of all new school builds.

In your experience, what resources, tools, or design practices can best support improved accessibility in existing, often older, buildings?

Education and awareness of physical accessibility issues for all staff who have influence on the built environment is key to improving accessibility in existing, older buildings. Training and knowledge are the tools that inform design practice leading to improved accessibility.

Viewing all physical work, regardless of scope, through the lens of accessibility ensures that these buildings are improved not only by specifically funded upgrades but also through unrelated capital improvements, additions and renovations, general maintenance and regular repairs undertaken throughout a building's lifecycle. Again, access to additional funding will be needed to provide boards with adequate flexibility to improve accessibility and meet compliance deadlines by 2025.

What other elements should be considered to enhance the physical accessibility of K-12 schools?

Accessible design and features within a building are part of the building fabric and can benefit everyone, regardless of ability. These are not extra spaces designed to be added on to the regular building, but are basic essential parts of a functional building.

School boards should also be aware of exterior accessibility throughout board sites and meet the requirements of the Design of Public Spaces Standard. This means taking into account access to play areas, shaded areas and paths of travel, in all seasons.

Budget constraints limit school boards' ability to provide the level of accessibility they aspire to. Appropriate, and flexible, financial support would provide significant benefits for students, their families and all visitors to schools. As OPSBA recommended in its January 2017 brief to the Ministry of Education regarding the 2017-18 Education Funding Engagement Guide, this could be addressed through the re-establishment of the Local Priorities Grant, which would allow for local flexibility and could be used to support specific local board initiatives and funding challenges. However there are certain instances where it would be cost-prohibitive to renovate or retrofit in older facilities, and full building replacement may in fact be the more financially viable option.

Other

As professionals in the education sector, what other barriers have you experienced in providing an accessible, inclusive education, and how could they be addressed through a new accessibility standard for education?

Suggestions from our members include:

- Ensure special education and AODA training is included in programming for those pursuing a career in teaching.
- Accessibility for students with complex needs continues to be a challenge for school boards, in terms of human resource supports, program supports, community agency supports, and financial resource supports to ensure a fully inclusive and accessible environment.
- Over many years, school boards have planned for and addressed accessibility, through capital plans, facility-related individual student needs and special education plans. This often comes at great expense, particularly in older facilities, with no dedicated funding for this purpose.
- The development of a new accessibility standard for education should clearly define the responsibility for all board staff to meet the accessibility needs of students, staff and the community and enable their integration into the fabric of school and community life.
- There are competing rights under the Ontario Human Rights Code with regards to students who demonstrate behaviour issues and staff/other students' rights to feel safe. Adequate funding to provide accommodations could assist with this issue.

Thank you for this opportunity to provide feedback on the development of an Accessibility Standard for Education. We look forward to participating in the process as it moves forward in the coming months.

Sincerely,



Laurie French
President

The Ontario Public School Boards' Association (OPSBA) represents public district school boards and public school authorities across Ontario. Together our members serve the educational needs of nearly 70% of Ontario's elementary and secondary students. The Association advocates on behalf of the best interests and needs of the public school system in Ontario. OPSBA believes that the role of public education is to provide universally accessible education opportunities for all students regardless of their ethnic, racial or cultural backgrounds, social or economic status, individual exceptionality, or religious affiliation.