**Developing an Accessibility Standard for Education  
PAAC on SEAC Submission**

The **Provincial Parent Association Advisory Committee on Special Education Advisory Committees** (PAAC on SEAC) was established in 1983 and is the only group in Ontario that brings together provincial parent associations to communicate and co-operate on issues pertaining to SEACs. PAAC, and its member organizations, encourage valuable partnerships among trustees, educators, voluntary associations and parents. PAAC on SEAC members have been working closely to improve SEAC effectiveness and communication, and to assist Ontario’s students with special education needs through our shared advocacy.

PAAC would like to thank the Ministry of Education for including PAAC in the consultation process for developing an Accessibility Standard for Education. This work is timely, as currently, the Ontario Human Rights Commission (OHRC) is also seeking input on the Guidelines on Accessible Education. We hope that the Ministry of Education and the OHRC will look to each other to share their findings on such an important issue as accessible education and see a great opportunity for collaboration between the groups.

The following feedback was collected from our membership in response to your consultation. If any of the feedback is unclear or you are looking for further discussion on our comments please do not hesitate to connect with us directly.

In the Engagement Guide, we notice that the Ministry is using the definition of Disability as defined by the Ontario Human Rights Code and the AODA. It is our opinion that this definition needs revision. It uses outdated terminology and negative language. It would be our suggestion to ensure the definition is broad and include past, present and perceived conditions as well as intermittent, episodic and transient conditions.  Further, it should recognize the diversity of individual needs and the broad continuum of child development. As cited in the Engagement Guide Appendix, we support the inclusion of neurological conditions such as epilepsy and brain injury and would encourage recognition of other challenges such as Fetal Alcohol Spectrum Disorders (FASD). It would be our recommendation to broaden the definition of service animals to include all types of animals that provide support and the wide range of supports they provide.

**Theme 1: Accessibility Awareness and Training**

Questions:

What could your school, college or university do to improve their awareness and consideration of the accessibility needs of persons with disabilities?

* + Develop/deliver curriculum on ableism, disability, and accessibility barriers
  + Take an individualized approach that involves students and families and identifies the learning profile for every student and adequate resources to meet all of the student needs
  + Clarification of language related to human rights; duty to accommodate, etc., in a school context (for example, relationship of term “accommodations” to IEP elements of accommodations, modifications, alternative programs, etc.)
  + Improve professional development for teaching staff/support staff in supporting students accessibility needs
  + Offer disability awareness programs in classrooms to help understand disabilities. Example: Epilepsy Ontario’s program ‘Thinking about Epilepsy’
  + Enhance resources to include students with disabilities/accessibility needs
  + Training to promote the highest possible individualized academic and social learning outcomes for all students. If goals are set too low, accessibility will be ignored, and when accommodations are not available, outcomes for students will be limited. For example, when students are not seen to be able to access Ontario curriculum, they are being denied the technological accommodations that could make that possible and improve student outcomes

What resources or policies have you seen as most effective to support awareness of accessibility needs in your school, college or university?

* + AODA Customer Service Standard
  + School Board Accessibility Plans
  + Equity and Inclusion Policy \*
  + Pledge to End bullying

\*While this policy exists, it is not meeting its potential. It needs to be strengthened with a greater emphasis on disabilities and students with accessibility needs.

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

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

* + Lack of information on universal design, removal of barriers and special education accommodations and how the school can support students with disabilities
  + Power imbalance between student/family and teachers/administrators due to lack of information and knowledge about special education. Schools need to respect the way students (with the help of their parents) define their own accessibility requirements
  + Inadequate information regarding placement options available within the school boards and students rights to access those placements
  + Poor communication of tools and resources to support students and parents. Example: School board Parent Guides to Special Education are not given to parents early enough in their process of seeking special education supports and services
  + Lack of system navigation supports for parent/guardian
  + Overall lack of programs/supports to ensure student accessibility needs are met. Example: Lack of qualified teachers for students who are deaf/hard of hearing

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

* + Regulation 181/98 requirement for all school boards to share with families a Parent Guide to the Special Education process\*\*
  + Parent workshops on human rights, curriculum and adaptation, special education, the IEP and IPRC with hands on activities and parent friendly resources
  + School board websites that are easy to navigate and have plain language information about special education
  + Collaborative approaches that respect the role of the student and of the parent and their expertise about the student
  + [*The Individual Education Plan (IEP), A Resource Guide, 2004*](http://www.edu.gov.on.ca/eng/general/elemsec/speced/guide/resource/index.html)– contains helpful reference to collaboration and accommodation
  + [*Shared Solutions – A Guide to Preventing and Resolving Conflicts Regarding Programs and Services for Students with Special Education Needs*](http://www.edu.gov.on.ca/eng/general/elemsec/speced/shared.html)*, 2007*
  + Parent association websites, resources and parent advocacy workshops

\*\*While this resource exists, it is not utilized appropriately. Offering a parent guide is a good effective practice, but some of the guides that are currently offered are not user friendly, and do not outline for parent/guardians all the available options for students.

**Theme 3: Information, Communication, and Inclusive Decision-Making**

Questions:

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

* + Lack of information about special education programs and services and how to access them
  + Students face barriers of attitudes, particularly to those who require communication supports (AAC) or those with developmental disabilities
  + Often see a power imbalance within the system and parents are not viewed as experts on their children
  + Poor communication regarding process and accountability mechanisms. There is inconsistency across all school boards, including inconsistencies around implementation of standards and practices
  + Not seeing and respecting the student as an individual
  + IEP development – Not including or consulting with parents and students in the process

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?

* + Specific teaching of self-advocacy skills. Example: including IEP program goals for self advocacy \*\*\*
  + The requirement of implementing Individual Program Plans (IPP) by all students, using such tools as MyBlueprint
  + [LD@school](http://www.ldatschool.ca) resources for educators and annual Educators’ Institute
  + Parent workshops
  + Access to quality Psychoeducational assessment. Not for categorization but to identify strengths and needs in order to identify appropriate accommodations/recommendations

\*\*\* Provide self-advocacy goals with the understanding that despite teaching self-advocacy skills, not all students can independently or consistently apply them, meaning the boards should still be working collaboratively and proactively with the student/family in all areas vs. using the rationale that a student did not ask for it, as to why the support/service was not implemented.

**Theme 4: Transition Planning**

Questions:

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

* + Delays in the exchange of student information, including the OSR and IEP, between schools, panels and school boards, care and treatment facilities
  + Differences between elementary/secondary schools and post secondary in how they identify and accommodate students with disabilities
  + There is a difference between REG 181/98 (whereby the law requires a Transition Plan for all students with disabilities aged 14 and over) AND PPM 156 (whereby it is Ministry policy to plan for transitions throughout school life). There is a great need to promote post-secondary planning and career development throughout high school
  + There are different exceptionality criteria requirements for the Identification, Placement and Review Committee from school board to school board

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

* + Employment - Many students with disabilities do not have opportunities to develop pre-employment skills, or have employment in their teen years. This lack of engagement in the workforce denies them the opportunity to develop work experience that employers are seeking
  + Post Secondary Education or Training – Students with disabilities face additional barriers related to the cost and availability of services and supports they require (for example, accessible accommodation and transportation, personal care supports, health care therapy services, equipment for mobility, communication and activities of daily living)
  + Community Living – Lack of MCSS funding for people leaving school. Lack of adult education opportunities geared to students with disabilities who seek to improve their basic literacy and numeracy skills
  + Goal setting: goals are not high enough and are not helping students to prepare for employment
  + Lack of eligibility for, and access to, co-op placement. Denial of accommodations for valuable experiential learning – especially in Co-op Education

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

* + PPM 156 has increased awareness about the need for transition planning, as well as improving documentation
  + Connections project to support students transitioning from Intensive Behaviour Intervention (IBI) programs to school
  + PD for teachers and other staff on effective transition planning is helping to improve the quality of transition planning
  + Transition workshops for parent/guardians is helping to increase knowledge about the transition to adult services (Examples include Ministry of Education, Parent Engagement Office, Parents Reaching Out Grants for transition activities
  + Transition programs offered by colleges and universities to incoming students with disabilities
  + [TRANSITION Resource Guide](http://www.transitionresourceguide.ca/) and website
  + Person directed planning as early as possible

**Theme 5: Inclusive and Accessible Learning Spaces**

Questions:

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

* Many schools are older and accessibility challenges include the lack of ramps, access to multiple stories, safe washroom facilities, small classrooms, auditoriums and stage areas that are inaccessible, inadequate signage, poor acoustics, playgrounds and equipment that are not accessible, etc.
* Accessible transportation for school trips, and accessibility barriers at the sites of school trips.
* Lack of access to transportation to support student participation in co-operative education and community connected experiential learning Attitudinal barriers – unwillingness to look for accessibility solutions in neighborhood schools and to involve students and families in the planning

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

* + Continued improvements to the building code to enhance accessibility
  + Enhanced financial resources to accelerate accessibility improvements
  + Sharing effective practices and cost-effective solutions across the province
  + Principles of universal design in all planning for renovations and building of new schools
  + Collaboration with experts from the community and post secondary system ( for example, Mobility and Orientation experts from Vision Loss Rehabilitation Ontario (formerly Canadian Institute for the Blind))

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

* + Sharing of expertise and best practices between school boards
  + Designated funding for accessibility improvements

**Other Questions**

As a student or parent, what other accessibility barriers have you experienced in pursuing you or your child’s education, and how could they be addressed through a new accessibility standard for education?

* + The IPRC process can be intimidating for parents and creates “eligibility criteria” to access special education programs and services
  + Long wait lists for medical and psychological assessments, (for example, assessment of students with ASD, ADHD, FASD and LD) create barriers to eligibility for special education supports and services
  + Cultural barriers preventing effective home-school collaboration
  + Attitudinal barriers preventing students with special education needs in accessing curriculum. Some students are met with the attitude that they ‘can’t, won’t or shouldn’t’ access what other do/can. Through in-services, PD/AQ, school wide assemblies, theme days, in-class projects etc. students and teachers
  + Can learn that students with disabilities can and should access what all other students do. Low academic expectations for some students are self-fulling as they lead to reduced opportunities for academic achievement
  + Students with special education needs find themselves excluded from school and activities in many cases because the schools do not have the resources or knowledge as to how to include and support them. Ensuring that all students have an opportunity to participate in class, school trips and community placements/co-op is paramount.
  + Confusion of understanding between the terms, “placement” and “program”. This is especially critical, as currently, only Placement is appealable through the IPRC process. It is difficult to evaluate the correct placement for a student without full disclosure about programs and services available at each placement.

As a professional 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?

* + Some special education programs and services are considered as discretionary and are especially vulnerable when school boards face budget challenges (for example, speech-language pathology services)
  + This could be solved with clear requirements or expectations about what should be delivered in special education and adequate funding to provide the services
  + Parent intimidation when they request placement in the regular classroom in the home school for students with special education needs (for example, yes your child can attend that school but we can’t provide any supports)
  + This could be solved if the expectation was that “every student should have the option of attending the regular class in the home school, with the appropriate supports”
  + Conflict resolution IPRC – The identification and placement decisions of the IPRC are appealable at the school board level and can be taken to the Special Education Tribunal level, but parents are intimidated by the complexity of the process and the potential cost of legal representation at mediation or in court. Since school boards use public money for legal appeals, there should be public funding available to families for their appeals
  + Conflict Resolution IEP – The IEP is not appealable and families often they feel they have no recourse if they are not happy with the content and/or implementation of an IEP
  + Solution – An independent mechanism for conflict resolution should be available to parents. The mechanism should be built consistent with the principals of [*Shared Solutions – A Guide to Preventing and Resolving Conflicts Regarding Programs and Services for Students with Special Education Needs*](http://www.edu.gov.on.ca/eng/general/elemsec/speced/shared.html)*, 2007*

Thoughtfully submitted by,



Katie Muirhead, Chair

PAAC on SEAC c/o Tourette Canada  
245-5955 Airport Road  
Mississauga, ON L4V 1R9  
[info@paac-seac.ca](mailto:info@paac-seac.ca)  
www.paac-seac.ca