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LDAO Response to Consultation on an Accessibility Standard for Education

July 2017

The Learning Disabilities Association of Ontario (LDAO) and its community-based chapters represent the interests of persons with learning disabilities (LDs) throughout Ontario. In the publically funded school system, students with LDs make up about 40% of students receiving special education supports and services, and many students with LDs go on to postsecondary studies at colleges or universities. LDAO supports the decision to add an Accessibility Standard for Education to the standards already in place under the Accessibility for Persons with Disabilities Act (AODA), and welcomes the opportunity to provide input to the scope of the proposed education standard. LDAO also provided input to the submission of PAAC on SEAC, and distributed information about the online survey to LDAO chapters and SEAC members.

The following outlines LDAO perspective on the questions and the issues raised in the online survey.

Accessibility Awareness and Training

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

In the elementary/secondary sector:

- Preservice training of educators, mentoring of first year teachers and ongoing professional development should include awareness of accessibility needs of different types of disabilities, while always promoting an individualized approach for each student. While the new preservice curriculum includes some information on special education, in order to serve the students with special education needs found in every classroom, it would be useful for all classroom teachers to take the basic Special Education Additional Qualification (AQ) course.

- School boards could partner with parent associations to provide professional development for educators. Special Education Advisory Committees (SEACs) also have an important role to play in improving accessibility awareness.

In the postsecondary sector:

- Currently there is a one time accessibility overview mandated. Consideration may be given to annual or more than once a year accessibility overviews with a deeper focus. Since collective agreements may interfere, a postsecondary-wide committee should be struck to see how development and implementation could be accomplished institution-wide, especially to faculty, full and part time. This may be part of a 'super' credential that faculty could earn that would be of value for them to earn.

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

In the elementary/secondary sector:

- Some school boards run day long sessions for parents and educators, coordinated by the Special Education department in partnership with SEACs.

- Some SEACS have created pamphlets or one-pagers for parents and educators, e.g. on IEPs.

- Designated PA days focussing on accessibility needs and special education processes can be very useful. One PA day a year used to be mandated for special education topics. This should be re-instated.

- Some school boards have developed professional development for all educators based on a **Learning for All** approach (www.edu.gov.on.ca/eng/general/elemsec/speced/learning.html). This approach is a good start, but should not replace individualized programming for students with learning disabilities, based on their profile of strengths and weak processing.

In the postsecondary sector:

- Availability of trained staff to work with faculty upon request, as part of the accommodation process, should be continued or further developed. Currently some institutions are quite good at doing this and they might share effective practices. Policies without promotion or designated resources are seldom useful. Some institutions have awareness days that can be quite impactful and these should be adequately resourced and continued.

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

In the elementary/secondary sector:

- Parents are the ones who initially are seeking supports, programs and services for their children. While some schools encourage parents in this process, others are reluctant to provide information on options. In many cases this depends on the attitude of the school principal.

- Although every school board is required to create a Parent Guide to Special Education in their board, too often this is not made available to parents until they are far along in the process. If parents do not find one of the parent associations that can provide information on their rights and how the process works, they can flounder for years without getting support for their child.

- Parents are often not included in school team meetings where educators plan steps in meeting the educational needs of their child.

- Some schools will offer to create an IEP, but do not tell parents about the formal identification process (IPRC) or actively discourage parents from going this route.

- Even when there has been an IPRC and an IEP, implementation often depends on the willingness of teachers, and the persistence of parents. Some teachers do not understand the individual needs of the student and are reluctant to implement accommodations.

- IEPs that make use of drop-down menus do not adequately individualize programming for students according to their needs.

- Access to psychoeducational assessment is a huge barrier for students with learning disabilities. Most school boards have long waiting lists, and private assessments are very expensive. Parents who have a group medical plan may get some help in paying for private assessments. There is two-tiered system of access to assessment. Assessment reports are required for some IPRC identifications, but more importantly they are needed for an individualized approach to provision of supports, programs and services.

- Information about the availability of accessible versions of text through Alternate Education Resources Ontario (AERO) is sparse or non-existent in the elementary/secondary sector. Every teacher should know about this and understand the process at their institution to implement since e-text can be a major source of support for so many students.

  In the postsecondary sector:

- Students with learning disabilities usually require an updated psychoeducational assessment in order to access accommodations and services at the postsecondary level. Secondary schools are reluctant to assess students in their last year or two of high school, and assessment at postsecondary is difficult to access on a timely basis. The Bursary for Students with Disabilities (BSWD) helps, but is only available to students who are financially eligible for an OSAP loan.

- There is little or no continuum of services or information from secondary to postsecondary unless the student is aware and takes the initiative to access them. Despite a wide range of services available, students either don't know about them, don't feel that they would be beneficial, or are fearful that using them may compromise their standing academically.

- Instructors and faculty are often not aware of availability of accessible versions of text. Even when e-texts are available through AERO, faculty and instructors still persist in using other reading material that is not easy to convert to e-text, which puts many students at a disadvantage.

- Many faculty in postsecondary still don't believe that accommodations level the playing field without giving an advantage, and therefore resist providing accommodations.

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

In the elementary/secondary sector:

- School board Parent Guides can be useful if they clearly describe the steps of the process of getting supports, programs and services, outline all options, and are provided early to parents who are seeking help for their child.

- A policy of parent involvement that takes seriously the knowledge a parent has of their child, and works toward a partnership approach, can be very productive.

- For parents, LDAO offers information about available supports and services, and promotes understanding of processes for accessing appropriate accommodations, through its local chapter network, and provincially through its LD@home website.

- For educators, LDAO provides a wealth of information on evidence-based programming for students with learning disabilities through its LD@school / TA@l'école websites and its annual Educators' Institute.

In the postsecondary sector:

- In some institutions, the office for students with disabilities is a well-staffed and managed unit with a credible reputation; in others, it is less so. The government needs to ensure that institutions understand the importance of this service and ensure it is adequately funded and managed well.

- Funding for offices for students with disabilities has not kept up with the increasing numbers of students seeking services. This has often resulted in less opportunity for students to have regular contact with a disability advisor, and some students are not able to get appointments until there is a crisis. In many cases, the availability of ongoing support might avoid crises, and prevent drop out due to failed courses.

- Transition programs provide specific supports, which need to be continued, developed and deliberately worked on through secondary-postsecondary partnerships. Without dedicated staff and structure, transitions are hit and miss. Transition support needs to start before the students enters their postsecondary program and continue at least though the first year.

Information, Communication, and Inclusive Decision-Making

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

In the elementary/secondary sector:

- Parents' understanding of their child's strengths and needs are often not taken seriously enough, or parents feel intimidated by educators and/or administrators.

- Parents may not understand the special education process, their rights and options. This is especially true of recent immigrants. Parents may too readily accept the school's statement

that there is not enough funding for the supports their child needs.

- Some parents assume that everything they have been promised will actually happen, and trust the school to carry on with the plan. Sometimes this assumption is accurate, but often parents need to monitor how plans are being implemented.

- Students may not learn self-advocacy skills and may not understand their strengths and weaknesses. Many young teens are reluctant to participate in decision-making or even to access accommodations, since they do not want to appear different from their peers.

In the postsecondary sector:

- Parents and students may be unaware of supports available at postsecondary. They also may not realize the difference between supports they are used to receiving in secondary school, and what is available in postsecondary. Some students struggle until midterms and do not seek help until it is too late to drop courses without penalty.

- Parents are often actively discouraged by postsecondary institutions from any participation in decision-making, even when their young adult wants them to attend meetings as support.

9. 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?

In the elementary/secondary sector:

- Students should be involved early in the development of their IEP, and teachers should listen to students' understanding of what they need in order to learn best.

- Specific teaching of self-advocacy skills can start in elementary school and continue throughout secondary grades. Students need to learn about their specific profile of strengths and weak areas, and learn what teaching approaches and strategies work best for them. They need to become comfortable with asking teachers for help. This is gradual process, and students differ in their readiness to self-advocate, so asking for help should not be a prerequisite for getting accommodations at the elementary/secondary level.

In the postsecondary sector:

- Participation in a transition program is the most important factor in preparing students to participate in educational decision-making and planning. Students learn self-advocacy skills that are appropriate at postsecondary levels, and make connections with the personnel at the office for students with disabilities.

Transition Planning

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

In the elementary/secondary sector:

- Students transitioning to and from care/treatment and/or correctional facilities face a disruption in their educational programming. Often the Individual Education Plan does not follow immediately with the student. This can happen with transitions between schools as well.

- Students transferring back to home school boards from Provincial Demonstration schools may find it difficult to access the kinds of supports and accommodations they benefitted from at the Demonstration school, e.g. technical support may not be available for use of assistive technologies. Transition support from the Demonstration schools is available but not always to the extent needed.

- Students transferring to a new school board who have been identified though the formal IPRC process have to go through a new IPRC in the new board. Sometimes the criteria for provincial identification are interpreted differently by the new school board, and the IPRC statement of the old board is not accepted. This can mean that a student does not receive the programs and services they had in the old board. Sometimes the previous IEP is not accepted either.

In the postsecondary sector:

- Lack of access to updated psychoeducational assessment can be a barrier, or assessments done through the school may not have sufficient information for postsecondary education.

- Access to accommodations is based on different criteria at the postsecondary level compared to the elementary/secondary level, and secondary schools do not necessarily explain this to students and parents.

- Parents and students are often not aware of the differences in supports that are available in postsecondary education, e.g. modifications of curriculum and re-explaining of exam questions are usually not allowed.

- Parents and students may not be aware of, or understand the importance of, transition programs provided by postsecondary institutions. All students should receive information about transition programs from their secondary school resource teachers or guidance counsellors.

- Delays in accommodations can happen when there are transfers between postsecondary institutions; for example, the second institution may not have sufficient information up front, assistive technology may not be the same at each place.

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

For transfers to postsecondary education:

- See answers to question 10.

For transfers to apprenticeship programs:

- Very few students come with psychoeducational assessments from previous educational settings. Students are usually out of their college apprenticeship program before testing can be completed to identify appropriate supports and accommodations. There is no time in the transition to apprenticeship to ensure that needed services are in place, for example, text books in alternate format for those with learning disabilities, or extra time for written tests. It could be more efficient in this context to have a universal design approach, e.g. all students would have access to e-text formats and extra time if needed. This approach would benefit students who have unidentified disability-related accommodation needs, as well as other students who struggle in classroom settings or whose first language is not English or French.

For transfers to employment:

- Students are often reluctant to disclose disability needs in the employment application process or at work, for fear of stereotyping or negative attitudes. Often this fear is justified since awareness of disabilities, especially invisible disabilities, is not high in the employment sector.

- Students may not have a good understanding of how their profile of strengths and weakness fits with requirements of different employment sectors. Ideally this should be a role of the office for students with disabilities.

- Students may not get enough details about required duties in posted job descriptions, making it hard for them to match prospective jobs with their areas of strength and weakness.

- The types of accommodations that helped a student be successful in their studies may not be suitable to the type of job they are seeking. Students need to have a better understanding of what accommodations might be appropriate in the workplace.

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

- Specific training in self-advocacy that starts at elementary levels and continues through transition to postsecondary levels.

- Provision of postsecondary multi-day transition programs that take place before students start a postsecondary program, and provide continued support through the first year. Recently the Ministry of Advanced Education and Skills Development has discontinued specific funding for these transition programs, and competing budgetary priorities at postsecondary institutions may put such transition programs in jeopardy.

- [Transition Resource Guide](#) and website.

- LDAO chapter presentations to parents and students by representatives from offices for students with disabilities at local colleges and universities.

Inclusive and Accessible Learning Spaces

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

- The built environment is not a huge issue for most students with learning disabilities, with the exception of wayfinding for some students. These students will need longer to learn how to find their way around a new building or campus. For some, maps will help, while others would benefit from written instructions.

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

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

Additional Barriers to Accessibility in Education

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

- Parents and students who contact LDAO often struggle with appeal mechanisms and dispute resolution processes. In the elementary/secondary sector, disputes about implementation of accommodations or attitudes of teachers are most common, and there are no appeal mechanisms for these.

- School boards need to develop a progression of informal to formal dispute resolution processes. *Shared Solutions – A Guide to Preventing and Resolving Conflicts Regarding Programs and Services for Students with Special Education Needs, 2007,* provides some useful tools for informal dispute resolution. Formal dispute resolution might be handled at a school board ombudsman's office, or another arms-length body.

- Appeal and dispute resolution processes at postsecondary levels can be complicated and students feel that they experience a power imbalance. It is often not clear where the role of the office for students with disabilities fits when there are student conflicts with faculty or academic departments. On one hand, staff could advocate for students and support accommodations that have been granted, but on the other hand, keeping good relationships with faculty is also a goal.

- An Accessibility Standard for Education should mandate a system of dispute resolution processes that are user friendly for parents and students.

17. 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?

- The attitude of some faculty regarding accommodations for students with disabilities in professional programs and internships continues to be a constant source of frustration for students.

- An Accessibility Standard for Education could make it clearer to faculty that reasonable accommodation applies to all students with disabilities.

Summary

LDAO commends the Ontario government for following through on its promise to develop an Accessibility Standard for Education. The initial survey should provide wide-ranging suggestions on the scope of such a standard. LDAO agrees with the goals of increasing awareness of accessibility needs, removing barriers to informed participation by parents and students in accessing programs, services and accommodations, and enhancing transition planning. The development of accessible dispute resolution processes should be added to the mandate.

In many cases, there are accessibility policies in place from the Ministries involved, but what is lacking is accountability for implementation of policy. There are few standards in place that apply across school boards or across postsecondary institutions.

In development of standards, it will be important to remember that 'one size does not fit all'. There must always be an individualized approach to program planning and accommodation, based on the needs of the student. While social inclusion is a goal for all students, a philosophy of educational inclusion that does not allow for intensive educational interventions in another setting to the regular classroom, will disadvantage many students with learning disabilities. Similarly, while principles of universal design are important, they will not by themselves remove all accessibility barriers. There must be room for an individualized approach to accommodation.

LDAO looks forward to working with the Accessibility Directorate, the Ministry of Education and the Ministry of Advanced Education and Skills Development in the development of a new Accessibility Standard for Education.