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**Learning Disabilities Association of Ontario   
submission on the initial recommendations from the   
K-12 Education Standards Development Committee**

**October 2021**

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 publicly 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 welcomed 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 has been following the progress of the K – 12 and Postsecondary Standard Development Committees (SDCs).

LDAO commends the work of the SDCs in their thorough review of the many issues and barriers facing students with disabilities in education. There are many excellent recommendations in their 2021 interim recommendations reports.

The following are comments and suggested changes for the K – 12 Interim Recommendations report, based on consultation with the LDAO Legislation and Policy Committee. Feedback on recommendations of the Transitions subcommittee and Postsecondary SDC will be submitted separately.

**Overall comments**

* There are recommendations in different sections of the SDC Interim Recommendations document that overlap and need to be aligned.
* The volume of recommendations will be challenging for school boards to digest and implement, so follow-up and accountability measures will be important.
* LDAO recognizes that there have been strides in teacher pre-service training and on-going professional development over recent years, but at this point understanding of students with exceptionalities is still not consistently embedded in educators’ academic experiences.

**Section one: Attitudes, behaviours, perceptions and assumptions** and   
**Section two: Awareness and training**

Sections 1 and 2 both address **educator professional development and training**. LDAO supports these recommendations with the following comments:

* LDAO agrees that pre-service and in-service training of educators needs to address the “philosophy of equity, accessibility and the inclusion of and full participation by students with disabilities” (3.1) and “Universal Design for Learning” (6) *but it is also very important for educators to learn to differentiate instruction to meet the individual needs of students.*
* Special Education Core content in pre-service education must be mandatory and be taught by educators with relevant training in special education.

* Special Education Core content in pre-service education must include detailed information on a wide range of disability needs and an understanding of how to individualize supports to meet each student’s unique disability needs.
* Universal Design for Learning needs to be taught in a way that is based on scientific evidence.
* There should be accountability mechanisms for what is taught in both pre-service and Additional Qualification (AQ) courses, e.g through student survey results that are made available to the College of Teachers.
* The content included in the Special Education Part 1 AQ should be included in preservice training.
* LDAO strongly supports pre-service and in-service training for educators on “how to use, interact with, and support the use of adaptive/assistive technology” (8.2). This recommendation should align with recommendations 32 and 33 in Section 4.

**Section three: curriculum, assessment and instruction**

**Diversity and accessibility in design and development**

LDAO supports recommendations 9 and 10 with the following comment:

* Curriculum design needs to incorporate Universal Instructional Design principles that are based on scientific evidence.

**Learning resources and self-assessment**

LDAO supports the recommendations in 11 with the following comments:

* There needs to be clarity on the responsibility of individual teachers in developing classroom materials that are accessible versus school board responsibility for its developed materials.
* Sharing of conversion-ready materials in accessible formats among school boards (11.6) is very important and should be included in the Accessibility Hub (20).

**Professional learning and development**

LDAO strongly supports recommendations 13 and 14 with the following comment:

* The importance of Differentiated Instruction, in addition to Universal Design for Learning, is appropriately highlighted in these recommendations.

**Student voice in barrier-free policy and practice**

LDAO strongly supports the recommendations in 15 and 16 with the following comment:

* There needs to be clarity about the availability of accommodations to students in any situations where assessments are not yet barrier-free.

**Early and on-going assessment for students with disabilities’ needs**

LDAO strongly supports the recommendations in 17, with the following comments:

* In addition to eliminating access barriers to timely assessments for the identification of disability related need, there must be early screening, with teachers having access to effective screening tools. Screening for possible disability needs in kindergarten and primary grades should lead to early interventions in a tiered approach. Students whose needs are not met by early intervention should then have access to timely assessments.
* Assessments of disability need should be ongoing to assess any changes in needs, and not limited to initial identification. However, re-assessments should not be necessary to confirm identification.

**Interactive communication in accessible learning environments**

LDAO supports the recommendations in 18 and 19 with the following comment:

* “accessible curriculum and assessment-informed instructional strategies for a wide range of abilities and needs” (19.2) – the concept of differentiated instruction should be emphasized.

**Accessibility hub and shared practices**

LDAO strongly supports the recommendations in 20 and 21.

**Teaching and learning about human rights and disability**.

LDAO supports the recommendations in 22 and 23.

**New and specialized programs**

LDAO supports the recommendations in 24 with the following comment:

* For students with disabilities in French Immersion, special education supports including remediation should be available in French.

**Physical health and wellness, mental health and well-being**

LDAO strongly supports the recommendations in 25.

S**pecialized alternative and expanded curriculum and pathways**

LDAO supports the recommendations in 27 and 28 with the following comment:

* Access to regular academic curriculum with appropriate accommodations should always be the first option considered for a student.

R**esource development and improvement planning.**

LDAO strongly supports the recommendations in 29 and 30.

**Section four: digital learning and technology**

**Professional development and training on accessible digital technology**

LDAO strongly supports recommendations 32, 33 and 34 with the following comments:

* Professional development and training of educators needs to be compulsory.
* For students with learning disabilities to succeed with assistive technology classroom teachers and educational assistants need to understand how to use these technologies.
* Parents of students using assistive technology need to be included in training.
* Educators need to be aware of the services offered by Alternate Education Resources Ontario (AERO) <http://alternativeresources.ca/Aero/Public/WelcomePage.aspx>.

A**ccessible digital and technology action plan**

LDAO strongly supports recommendations in 35 with the following comments:

* Recommendations should align with those made by the Information & Communications Standards Development Committee in their review, e.g. 35.9 “any textbook used in any learning environment must be accessible to teachers and students with disabilities at the time of procurement”.
* The statement in 35.11 “If a textbook is available in print, the publisher should be required to provide the digital version of the textbook in an accessible format at the same time the print version is delivered to the school/Board” should be a stand-alone recommendation, to align with recommendations of the Information & Communications SDC.
* LDAO strongly supports recommendation 36 to the Ministry of Education on providing sufficient long-term funding to support boards in acquiring and supporting assistive technologies and related hardware and software.
* LDAO strongly supports recommendations in 37 to the Ministry of Education on training programs to support boards. LDAO comments on recommendations 32, 33 and 34 would apply here as well.
* LDAO strongly supports recommendations in 38 and 39 to the Ministry of Education on removing digital learning and technology barriers.

**Section five: Organizational barriers**

**Compliance with the *Accessibility for Ontarians with Disabilities Act, 2005*, the *Ontario Human Rights Code* and the Canadian Charter of Rights and Freedoms**

LDAO supports the recommendations in 40 with the following comments.

* The provisions in 40.1 must in no way diminish the eligibility for special education processes and services that are currently available to students with special education needs.
* Broadening the definition of accommodations in 40.2 must take into account the important difference between accommodations and modifications. Educators need to understand that accommodations do not change the curriculum expectations while modifications do. This distinction is particularly important as students transition to postsecondary studies, where accommodations must respect the essential requirements of a course.

**Inter-ministry collaboration: to ensure students with disabilities receive the support they need from other ministry-funded services at school.**

LDAO supports the recommendations in 41.

**Accountability**

LDAO strongly supports the recommendations in 42 with the following comments:

* The Ministry of Education needs to have a strong role in ensuring accountability of school boards in accommodating students with disabilities up to the point of undue hardship.
* “Creation of an ombudsman/oversight office where students’ and parents’ concerns regarding the provision of education for students with disabilities can be investigated and resolved” (42.2) is an important accountability measure that should exist at the school board and ministry level. Such mechanisms should be available for students who are currently eligible for special education supports and services.

* The Ministry of Education can look for guidance to the recommendations of the *Provincial Advisory Committee on Formal Dispute Resolution Regarding Special Education Programs and Services.*

**Individual Education Plan**  
  
LDAO supports the recommendations in 43 to 48 with the following comment:

* The Ministry of Education should consult stakeholders, including parents, students, educators, parent associations and SEACs when revising the format and content of the Individual Education Plan (44).

**Parent and student participation**

LDAO strongly supports the recommendations in 49 with the following comments:

* Effective communication between parents and the school is vital and will be facilitated by all these recommendations.
* A school board level dispute resolution mechanism is very important and needs to be mandated by the Ministry of Education. Information on how to access the dispute resolution process must be publicly available to parents.
* Parents and students need to have access to both self-advocacy training and system navigators.

**Exclusions/refusals to admit to school/reduced school hours**  
  
LDAO supports the recommendations in 50.

**Data collection**

LDAO supports the recommendations in 51.

**School board accessibility committees and plans**

LDAO supports the recommendations in 53 with the following comment:

* “52.6. the Ministry of Education should be required to designate an office or role, such as an assistant deputy minister, responsible for achieving a barrier-free and accessible school system for students with disabilities.”

An Accessibility Secretariat, in the model of the Equity Secretariat, could serve this purpose.

**Professional learning**

LDAO supports the recommendations in 53 with the following comments:

* Recommendations for training and professional development in Sections 1, 2, 3 , 4 and 5 should be grouped together and aligned. LDAO comments on these topics in all these sections Sections would apply to Professional Learning in Section 5.

* Recommendations 53.9, 53.10 and 53.11 supporting parent engagement, advocacy skills and collaboration between parents and educators are very important.

**Process for a school board identifying and making the placement of student with disabilities recommendations**

LDAO has some concerns about the recommendations in 54, 55 and 56, as follows:

* Any review of the identification, placement and review committee process and regulation needs to be done very carefully and not diminish any rights that are currently in place, e.g. for students who would not qualify as a student with a disability. Legal protections for parents need to be retained.
* A review panel should include representatives from parent associations who have members on Special Education Advisory Committees.
* LDAO strongly agrees with the principles outlined in 56, but believes it should be possible to implement these principles within the current framework.

**Section six: Social realms**

**Educational and online events**

LDAO supports recommendation 57.

**Transitions facilitator/navigator**

LDAO strongly supports recommendations 58 and 59 with the following comment:

* Recommendation 58 on the transition facilitator/navigator role should be aligned with Recommendation 12 of the Transitions Technical Sub-committee, and should include support for transitions within and out of the K-12 system.

* Recommendation 59 on a Transitions Hub should align with Recommendation 29 of the Transitions Technical Sub-committee.

**Transportation**

LDAO supports the recommendations in 60 and 61, especially as they relate to the need to communicate with parents.

**Bullying/cyberbullying workshops**

LDAO supports recommendation 64 with the following comment:

* Development of Bullying/cyberbullying workshops should also be informed by consultation with families of students with disabilities.

**Experiential / co-op learning opportunities**

LDAO strongly supports the recommendations in 65.

**Social isolation**

LDAO supports recommendation 67 with the following comments:

* Staff assistance for social interaction and play needs to be informed by parental input on student needs and on strategies that have proven effective or ineffective.
* All educators and staff who interact with a student should be aware of social goals as outlined in the student’s IEP. There should be a school community approach.
* Educators or other staff who offer assistance for social interaction and play need to have specific training for this role. Training could be informed by the York Region DSB Unstructured Time Chart (attached).
* Social skills training for students should be included in the social goals in their IEP.

**Section eight: Planning for emergencies and safety framework**

LDAO strongly supports the need to plan in advance for emergency situations, such as the Covid-19 pandemic, and supports the recommendations in Section 8 with the following comments:

* The Ministry of Education must continue to provide very specific guidelines to school boards on accommodating students with disabilities when regular schooling is disrupted.
* Planning by the Ministry of Education must coordinate with the Ministry of Health and Ministry of Children, Community & Social Services in order to maintain school-based health and mental health services when students are not in school.

**Section nine: timelines and accountability**

LDAO strongly supports the recommendations for accountability measures with the following comments:

* The mechanisms to receive complaints and concerns should align with the dispute resolution mechanisms at the Ministry of Education and school board levels described in Section 5. Rapid response processes should be available at the Ministry of Education and school board levels as well as through the Accessibility Directorate of Ontario (189).
* LDAO supports the role the Ministry of Education should play in enabling the timely implementation of the Standards for school boards and the College of Teachers (194). An Accessibility Secretariat, in the model of the Equity Secretariat, could facilitate this process.

Respectfully submitted,

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