# AUTISM ONTARIO
## RESPONSE TO
# K-12 EDUCATION STANDARDS DEVELOPMENT COMMITTEE
## RECOMMENDATIONS (INITIAL REPORT)

**Autism**ONTARIO

*see the potential    voir le potentiel*

**Autism**ONTARIO

# MISSION

**CREATING A SUPPORTIVE AND INCLUSIVE ONTARIO FOR AUTISM**

# VISION

**BEST LIFE, BETTER WORLD, MAKING AUTISM MATTER**

# ENDS

**BECAUSE AUTISM ONTARIO EXISTS:**

**Individuals and families in their communities are equitably and seamlessly supported across their life course.**

**Individuals, families and communities have meaningful:** Supports, information and connections.

**Information/knowledge is created, curated and mobilized that is:** Trustworthy, timely and relevant.

**C** COLLABORATION
We believe in the power of working side by side with individuals, families and communities to make informed choices about autism.

**A** ACCOUNTABILITY
We hold ourselves and others responsible to achieve successful outcomes through high standards of integrity and fiscal responsibility.

**R** RESPECT
We value equity, diversity and inclusion, and we listen to understand.

**E** EVIDENCE INFORMED
We use and create knowledge to guide our decisions and work.

# OUR VALUES

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# INTRODUCTION

*Kudos to the committee for tackling huge disparities in a large, powerful system. You have produced a document that names and addresses both the practical steps and systemic changes required for equity in education in our province.*

Your efforts in setting Ontario on a constructive path are deeply appreciated. As an organization advocating for a vulnerable segment of society, Autism Ontario acknowledges that the invoking of human-rights legislation and code, as reference, guide and spur, is a necessity both sobering and encouraging. Accessibility to social benefits everywhere, including the classroom, is indeed a matter of human rights, and it will save us all time and other resources if this is delivered consistently across the province instead of piecemeal, one court case at a time.

In your response to your call for feedback, Autism Ontario (AO) assembled a small team to review all the recommendations contained in the document and produce written commentary, which is laid out in detail below and organized according to the system used in your document.

## OUR TEAM INCLUDED:

**AO Response Writing Committee:** Jessica Bethel, Lisa Cameron, Michael Cnudde, Airene Cunanan, Melanie Laurin, Laura Peetoom, Fauzia Reza, Adam Senour, Marg Spoelstra, Sue Walters, Cathy White

**Additional/Feedback Researcher:** Lauren Tristani

**Design:** Layne Verbeek

For sharing their thoughts as we prepared our response, AO thanks David Baker, Amanda Dimilta, Brendan Pooran and Suzanne Murphy.

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# SUMMARY

After reviewing the document and discussing it amongst our team, some overarching concerns rose to the surface. We outline them here.

## 1. TIMELINES

The implementation of 197 recommendations in roughly three years, in a system whose wheels of change turn very slowly, seems unrealistic, especially as the designation "immediately", once defined, implies "it should have already been done." In the case of attitudinal changes, for example, is it honestly possible to instruct and train teachers and leadership, develop and deliver curriculum, and bring the recommended changes into the school/classroom successfully by 2025 — a scant four years?

## 2. FUNDING

**The recommendations in this document can be sustained only by funding committed directly to accessibility, inclusion, equity and enforcement.** The funding formula must account for the supports needed to effectively meet the needs of all students — and their families, for parents cannot be expected to carry the cost of such things as necessary assessments and access to educational supports all on their own. Funding must be in place at the very moment in which this document is enacted — not later, as is the case with current SIP funding, which requires school boards to prove supports are already in place before funding is approved. Boards continually feel like they are stealing from Peter to pay Paul, and only dedicated, timely funding from the Ministry of Education, working in collaboration with other relevant Ministries, will make these recommendations fully achievable.

## 3. LEADERSHIP AND ACCOUNTABILITY

**We strongly encourage that the Ministry of Education drive the implementation of these recommendations, once the document is enacted, in every way. It cannot be left up to school boards to interpret and self-report on Ministry policies, which so often leads to decisions of convenience that short-change students with disabilities.** The Ministry must use language like "must", "shall"; must specify "how" and "when" and "what happens if you don't." (See point 5, below.)

The Ministry must also follow up, at every step, with, "Is it successful? What needs to be changed?" The recommendations in this document will best succeed with evaluation measures that are clearly prescribed, diligently carried out, assessed and then retooled where necessary.

The Ministry will have to commit to engagement with third- or fourth-party, arm's-length evaluators so that this work may be done impartially and on behalf of those for whom it is being done — students

with disabilities, so that they can access every educational benefit society has to offer. There must be accountability at every step each recommendation requires, from training to planning to building. Accountability measures must be consistent, universal and open to public scrutiny, occurring at set intervals and taking into account situational changes over time.

## 4. INCLUSION, BELONGING AND COLLABORATION

This document doesn't mention students with severe or significant disability, those who are, in some school boards, labelled "developmentally delayed" and who are believed to be doomed to a life of utter dependency. The implication is that "education," for this population, isn't real; is merely the learning of basic skills like brushing their teeth or crossing the street safely. Neither does it explicitly include those with "invisible" disabilities — past trauma (sometimes experienced in a school setting), high anxiety, masked autism, atypical ADHD. Accessibility, equity and inclusion are only possible if all students are viewed as full human beings, as complex and varied in their individuality as the adults who are making decisions for them, and as worthy.

**All educational enterprises must rest on the fundamental belief that everyone belongs and can learn. This must be communicated from the top down, in informed leadership and collaboration with outside experts; and it has to be informed from the bottom up — in the many voices of students, parents, teachers and administrators who live the reality every day. Many educators have done some amazing work in this area; Ontario is blessed with large numbers of excellent teachers who are committed to their students' success. Still, a student's success can't depend on who their teacher is or what school they attend**.

**NB:** The words "integration" and "inclusion" are often used interchangeably, but they name two different principles. Integration can be defined (in this case) as a strategy or set of strategies that make it possible for exceptional students to participate in the "regular" classroom at certain points of the school day. Inclusion is a way of living. It is the right to be part of your milieu simply because you exist. It is about belonging. The educational system must be very careful not to give "the illusion of inclusion." It must be (borrowing from the definition of inclusion in this document's glossary) "a dynamic multi-dimensional organization" that "shows respect for the individual."

## 5. DISPUTE RESOLUTION

It concerns our organization that there are few recommendations that address the shortcomings of existing dispute resolution processes. Ontario lacks the enforceable commitment to accommodate students with assessed needs that can be found under human rights legislation in other provinces. While the Education Act speaks of all exceptional children receiving an "appropriate education," it provides no mechanism through which this can be enforced when a school board resists putting prescribed accommodations in place. The current appeal process is restricted to addressing "identification" and "placement" without regard to the kind of systemic pushback (from educators, unions, administration, boards) that accessibility accommodations often encounter. (See AO commentary on Section 5, Organizational Barriers.) Furthermore, as a component of the existing dispute resolution process, the Special Education Appeal Board (SEAB) is nearly defunct.

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The implementation of Bill 82 promised students with disabilities to provide what they needed to be successful in school. However, Bill 82 does not require school boards to fund private alternatives when they are unwilling or unable to provide accommodation for assessed needs. Provincial intervention by multiple Ministries in providing transitional or other funding for educational services has created a hodge-podge of "solutions" which recalcitrant school boards point to justify their inaction. Not even truancy laws under the Education Act are enforced, which is germane here because too often, exceptional students whose assessed needs are not being met are sent out of the classroom, to the hallway, the school office or home, and so are not receiving any education at all.

**The rise in human-rights cases launched by frustrated parents against the Ministry of Education surely shows us that existing dispute-resolution processes are not working.**

This report is landing at an interesting time, in which the COVID-19 pandemic has exposed the cracks in our social systems, especially those that serve the most vulnerable among us — including students with disabilities. A recent survey conducted in partnership with Autism Ontario and the Laurier Autism Research Consortium (LARC) has revealed the following:

- Of those students who were not registered for the 2020-2021 school year, 19.61% of caregivers indicated it was due to the education system not offering the needed accommodations. (Q5.7)

- 13.02% of caregivers whose children did not start or continue attending school full-time in person in the fall 2020 term cited that the "school could not offer the accommodation needed" (Q5.11)

- 30.85% of caregivers who indicated that their child did not participate in either in-person or remote learning during the January or April-June 2021 province-wide school shutdowns indicated that "remote learning does not work for this child". (Q5.14)

- 45.99% of caregivers suggested that they were unsatisfied or very unsatisfied with their child's educational experience during the COVID-19 school shutdowns in 2021. (Q5.17)

- Over half of caregivers indicated that their child was not engaged in online learning during the province-wide shutdowns (Q5.20), as follows:

  - Not engaged =6.85%

  - Minimally engaged = 27.73%

  - Slightly engaged = 22.10%

All the above is, despite the fact that, among survey respondents, 91.04% declared the student involved had access to the technology they needed for online learning. Among other insights, such statistics expose the frailty of hasty and "one-size-fits-all" accommodations.

This report speaks to the state of education as it is now, and as it needs to be in order to meet human-rights expectations of accessibility. It rests on the view that ALL students, including students with disabilities, are worthy of receiving what they need to feel safe and welcome in the school setting, so that they can learn and thrive. The work the committee has done outstanding: detailed, comprehensive and very bold. We salute the feat of coordination this document represents.

# BARRIER AREA NARRATIVES AND RECOMMENDATIONS

## OUR GENERAL COMMENTS

We appreciate that the perspective (both lived and professional) of a person with a disability was honoured here. A blend of voices ensures a balanced approach; both research and lived experience feed wise decision-making.

AO's work is always informed by key research and policy planning in the sectors of a) education pedagogy; b) human and organizational behaviour; and c) human rights. The practices we recommend and advocate for are thus based on measured evidence.

We commend the underlying message that inclusion, equity and accessibility compose a way of being rather than direction for activities done here and there. Stated goals and recommendations highlight this crucial message by addressing the reality that barriers are systemic and affect the well-being and success of students with disabilities in a multitude of ways. The emphasis on solutions at both the micro and macro level is constructive and insightful.

Because the recommendations go to the root of systemic injustice, the timelines given may be overly optimistic. Those timelines designated as "immediate" are especially problematic (see comments, Section Nine). We urge the committee to consider as well how success in implementation will be measured. If a proposed solution turns out not to work, how will it be assessed and corrected?

We appreciate the repeated concern that strategies not be reinvented 72+ times. Children, families, supporters, teachers all bear the brunt of decisions and actions that are limited and do not consider the whole picture. These are lives we are dealing in — people struggling daily, who need, deserve, all the support we can give them as a society. The Ministry must guard against the development of silos by providing sympathetic but firm leadership. ALL responsible organizations need to be on the same page, working together and not against one another.

**NB:** In the point-by-point below, AO has commented only on those Recommendations to which we had something to add or specifically wished to commend or question.

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# SECTION 1: ATTITUDES, BEHAVIOURS, PERCEPTIONS AND ASSUMPTIONS

The five recommendations of this section reflect how attitudes, behaviours, perceptions and assumptions underpin all work undertaken in the realm of human and organizational behaviour, where **barriers are both personal and systemic and so must be addressed at micro and macro levels simultaneously**.

We suggest that consistency across the province, while respecting the jurisdictions of District School Boards, requires the active involvement of both the Ministry of Education and the Ontario College of Teachers, and a deep understanding of the **challenges faced at the school board level around the resources available to deliver on each recommendation's intent**. The repertoire of resources that you have included in many sections is key to the success of these standards. We continue to invent the wheel 72 times. What a waste of public money!

That said, we suggest that equity, accessibility and inclusion are too important to be presented as add-ons. The curriculum must treat the rights/needs of others with the same essentially as numeracy and literacy, and must include both visible and invisible disabilities. **All assessments related to the recommendations in this document must be observable and measurable and even done by third parties**, not linked to the school or even the school board being assessed.

> **Consistency across the province... requires the active involvement of both the MOE and the OCT, and a deep understanding of the challenges faced at the school board level around the resources available to deliver on each recommendation's intent.**

We appreciate that the definition of concepts and terms was approached with the evident intent of ensuring consistent understanding amongst all stakeholders. We know that words may be interpreted differently if the driving message is not crystal clear.

1. *Preamble: Persons with disabilities (students, educators, employees, etc.) should be directly involved in designing and reviewing policies, programs, curriculum, as well as participating in speaking opportunities to students and educators at the school level, school board level, and ministry level, in K-12 Education and whereas the Ministry of Education should play a role in ensuring that students and professionals with disabilities are involved with provincial and system planning.*

Change "should" in the first sentence to "must." The voices of people living with disability — their lived experience — are essential to the design of these policies. The Ministry of Education is in the driver's seat here, and can demonstrate true leadership and a model for success.

1.1 *Each school board set up and maintain a network of teachers and other staff with disabilities, and a network of students with disabilities, to get input on accessibility issues at the school board and to get advice on barriers.*

1.2 *The Ministry of Education provide open and accessible opportunities for these student and school staff networks to share information and ideas.*

*Timeline: two years*

2. ***Preamble:*** *Specific strategies need to be taught so that teacher candidates and future teachers are instructed to ensure inclusive, accessible, equitable education and that there be consistency in the delivery of all Special Education Additional Qualifications.*

Agreed! "**Nothing about us without us.**" Could this network span school boards? If there was one network for the province, it might be easier to maintain consistency amid changing staff and students.

The inclusion of "emeritus" student members would also be useful, especially for transition recommendations.

Consistency in delivery of Special Education qualifications is very important. Currently, administrators of SpecEd in our province's public schools are not required to have any formal special education training (Spec. Ed. 1,2 or Specialist) and yet they are asked to evaluate the implementation of PPMs and policies e.g., PPM-140. Meanwhile, every teacher is estimated to have a student on the autism spectrum in their class, every year or every other year (based on 1:66 prevalence rate).

We appreciate that the Ministry is committed to increasing teacher training in respect to students on the autism spectrum, with a goal of up to 4,000 teachers trained over the next three years. This still amounts to only a small percentage; at this rate it will take a decade for half of teachers to have extensive training in autism. Is this good enough?

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3.  **Preamble:** *All education staff need to be in-serviced in the philosophy of equity, accessibility and the inclusion of and full participation by students with disabilities, so they are equipped to model inclusive behaviours and attitudes, and to ensure that* **differences are accepted as a part of life.**

The importance of this cannot be overstated! If we can truly live it, we will have everything we need. Disabilities and learning differences should be accommodated as a natural response – no more of an issue than if someone is left- or right-handed. **Most accommodations are good for all, essential for some**. Disabilities are differences. Everyone has differences!

3.1 *Each school board provide specific training to all school board staff who deal with parents or students, on the importance of the inclusion of and full participation by students with disabilities, and on effective strategies for teaching and designing lesson plans in this area.*

3.2 *The Ministry of Education develop and make available to school boards and the public, sample or model programs for training school board staff on teaching in this area.*

*Timeline: 2 years*

We feel that with such an important initiative the timeline of two years is inadequate. Consider the intersectionalities (race, gender, culture) that must be included in this training.  Change timeline to three years.

4.  **Preamble:** *School boards must instill accessibility planning into their vision and daily operations to eliminate attitudinal barriers among students, school board employees and families, and whereas they must clearly communicate this accessibility commitment to all families of their students.*

4.2 *Each school board develop, implement and periodically evaluate a multi-year age-appropriate program/ curriculum to teach all students, school board staff and families of school board students about the inclusion of and full participation of students with disabilities. This program shall include the following:*

a.  *Communication posted in all schools and sent to all families of the school board's students, on the school board's commitment to the inclusion of students with disabilities, and the benefits this brings to all students.*

b.  *Where possible:*

    *i. Exercises having students, staff and, where interested, parents/guardians conduct a barrier assessment such as a "barrier scavenger hunt" in the school or nearby community, to catalogue disability barriers and invent suggestions on how these can be removed or prevented.*

There is an underlying assumption here that all disability is in some way visible/perceptible and can be immediately "catalogued."

We suggest that guidance on "invisible" disability be provided: e.g., teaching on invisible and sensory barriers, such as flickering lighting, sudden loud noises, seating configurations and social-dependent activities.

5.  *Preamble: Supports needed to change attitudes and behaviours include policy frameworks, resources, opportunities and performance expectations.*

*The committee recommends:*

5.1 *Each school board develop and implement human resources policies targeted at full accessibility and the inclusion of and full participation by students with disabilities, including:*

a.  *Making knowledge and experience on implementing the inclusion of and full participation by students with disabilities an important hiring and promotions criterion especially for principals, vice-principals and teaching staff.*

It would also be useful to encourage the hiring of staff people with a disability or educators who are neurodiverse.

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# SECTION 2: AWARENESS AND TRAINING

## GENERAL COMMENTS

We strongly encourage that training is followed up with concrete actions on the part of school administrators or specialized personnel from the school board, perhaps with the guidance (ideally, from disabled educators/consultants) of direct coaching to ensure their effectiveness.

We suggest that the "accessibility lens" approach be used in the training design, in order to strengthen the Ministry's "goal of achieving a barrier-free education system." Let every initiative and recommendation be less about "dealing with" disability and more about simple human rights: that every educational offering be equitably accessible to all.

We encourage more in-person training (less online), with accountability for tasks and expectations and practical checks for comprehension. We support that the training be ongoing, as new research findings continually improve training and practice.

We suggest that training at the "general awareness level" be offered to all support staff, including custodians (for example), in order to foster inclusive community-building at the school level. We support that training be offered in more detail "for all staff who will need specific training not just special education teachers." Office staff, particularly, need support and training: students with autism or ADHD frequently engage with office staff or spend disciplinary time in the office.

## DIVERSITY AND ACCESSIBILITY IN DESIGN AND DEVELOPMENT RECOMMENDATIONS

*Curriculum and instruction recommendation:*

9. *The design, development and communication of curriculum (resources and lived experiences) ensure the following: full accessibility, equity and inclusion in supporting barrier-free accessibility for students with disabilities, cultural perspectives and responsiveness, Universal Design for Learning, the dignity, developing independence and ongoing learning for each person. This requires:*

9.3 *The ministry identify a ministry-designated office or person with lead responsibility for the ongoing review of all provincially mandated curriculum (and secondary resources guidelines offered to school boards) for removal of accessibility barriers.*

9.5 *Curriculum review and renewal in curriculum areas, include specific focus areas, such as:*

a. *Science, technology, engineering and mathematics, (STEM)*

b. *Science, technology, engineering, arts and mathematics*

c. *Alternative, expanded curriculum for students with disabilities that is barrier free and addresses relevant life skills*

Agreed! However, we first need to identify a problem not mentioned in this report: **There are disabled students who barely have any curriculum**.

Many such students have severely challenging behaviours that require a strong focus on safety. The result skews their experience toward "babysitting" without regard to their academic development needs. Amongst the more general disability population, research (such as a LARC survey AO conducted) has revealed some ongoing parental concerns, such as frequent calls to parents to take their kids away from school and school personnel not following IPRC recommendations and IEP goals.

About 10 years ago, school boards received money to develop alternate curriculum for special-needs students, which some boards did on their own and others did in partnership. Has there been any follow-up from the Ministry on the results?

One major barrier experienced by disabled students is extremely low expectations on the part of teachers and administrators, which leads to a situation where the IEP is simply repeated year after year. Then (and unfortunately), when the repetition is questioned, it is assumed that the student's (lack of) ability is the problem, and not the teacher's assumptions.

This relates to a general lack of knowledge of alternative curriculum (i.e. ABLLS, VB-MAPP, AFLS) and how to teach students who have not learned through traditional teaching methods.

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| *d. Curriculum that is responsive to cultures, history, experiences and perspectives of students and communities; multiple language-based curriculum such as, non-verbal, sign- American Sign Language, Indigenous languages.* | Include LSQ (langue des signes du Québec) for Francophones who do not request ASL, and Augmentative and Alternative Communication (AAC) supports for students who are non-speaking or pre-verbal. |
| *f. Curriculum design that is: responsive, includes cultural diversity across subject areas, ensures equity, addresses social and cultural perspectives, includes Indigenous ways of knowing.* | This is very important, and we recommend that "social and cultural" be defined very carefully, as our population is very diverse. Schools, at times, use "cultural misunderstanding" as an excuse to justify their inefficiency. Also, one might ask, who defines what the cultural perspective/needs are for a particular student? We cite this case by way of example: parents from a South Asian country expressed frustration that school personnel allowed their child to eat with their hands. The parents were told that it had been allowed because "this is how food is eaten in their culture." This interpretation of "South Asian culture" was not only inaccurate but also a stereotyping of one-fifth of the world's population. Special-needs students in Ontario should be taught — wisely and with input from individual families — behaviours that are socially appropriate in Ontario. |

Another, more general example: Some schools try to match students with teaching assistants from a similar ethnic/cultural background. This narrows down the student's social exposure, for one thing; it also assumes the student's "culture" is known and that the teaching assistant is an expert on it. Cultural diversity within ethnicity is broad! We want students in our public school system to be comfortable around all ethnicities, all cultures, without resorting to stereotypes.

*i.* *Curriculum that focuses on the development of learning skills that specifically address executive functioning skills (for example, emotional and physical self-regulation, working memory, self-monitoring, organizational planning and prioritizing, and task initiation). The development of these skills is critical to accessing learning for all, and student achievement and well-being*

Agreed; these would be significant priorities for someone with autism.

## LEARNING RESOURCES AND SELF-ASSESSMENT RECOMMENDATIONS

*In the end, a true measure of equity, access and inclusion for all in our schools is how well students from diverse backgrounds and with disabilities achieve in schools. This measure needs to include student voices in assessing how they are doing.*

Parental input is important for the population that is unable to express their opinion themselves.

Parents know whether their child is happy going to school each day, or not; this should be the first measurement.

*Instructional resources and materials need to be reflective and responsive to student identity, culture and learning needs. This requires all those developing resources to ensure design principles of Universal Design for Learning, timely conversion ready access including multiple formats.*

Including formats for Francophones by Francophones); when an English-language resource is being planned, a similar project must be planned for Francophones. Overall, let these resources reflect disability/difference in society by more than just people in wheelchairs.

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*Curriculum and instruction recommendation:*

*All learners, including students with disabilities, are ensured every opportunity to fully access and participate in meaningful, challenging learning opportunities and curriculum engagement...*

11.1 *Ministry and Boards will ensure the design of instructional materials that are fully accessible on a timely basis for students with disabilities, …*

11.5 *Procurement practices and use of board or school developed instructional learning materials should include ongoing data gathering on students with disabilities who require … accessing timely instructional materials and input on what is working and required for ongoing individual student learning.*

What is the definition of "timely"? We suggest "at the same time." It happens too often that students with disabilities wait too long for adapted material; in fact, may never receive it — unless (as is sometimes the case) parents fill in the gaps themselves, at home.

This is not an example of accessibility, equity or inclusion but rather an example of "apart."

11.6. *The ministry and Boards establish dedicated shared resources within and among school boards, to assist efficient and effective, timely conversion ready materials that are in accessible format, where needed. This includes ensuring a board lead for oversight, coordination and response.*

Who decides "where needed"?

Experience shows that such indeterminate language lends itself to denying or ignoring the needs of students.

*Assessment and accountability recommendation:*

12. *Students be instructed in self-assessment methods so that their observations and reflections on their own learning and the experiences and suitability of accessible resources can provide valuable feedback to teachers in refining their instructional plans.*

*Timeline: One year.*

This seems too optimistic a time frame for the process of teacher training to implementation of plans to student achievement, tempting educators to resort to simplistic means such as template pages with happy and sad faces on them. Thoughtful approaches require time!

# PROFESSIONAL LEARNING AND DEVELOPMENT RECOMMENDATIONS

*There is a difference between curriculum and pedagogy. Curriculum is all about what we teach. Pedagogy is about how we teach it.*

*When addressing Curriculum, Assessment, and Instruction, there is an explicit relationship between them. It is impossible to design curriculum without developing a deep understanding of who the students are through assessment (getting to know them) and ensuring their identities are reflected in the curriculum design and classroom resources, in instructional methods (how do we know how they learn best) and in fair assessment practices.*

Agreed. However, one should be mindful of the pitfall mentioned above (see 9.5.c.): assessment leading to lower expectations leading to less emphasis on pedagogy and more on safety/manageability. Functional behaviours and abilities do not necessarily reflect cognitive ability: consider, for example, the case of non-verbal students who are often assumed to be unintelligent ("dumb") and unable to learn to read because they cannot speak the words on the page.

See https://www.spectrumnews.org/opinion/standard-tests-underestimate-nonverbal-children-with-autism/

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

*The focus for all curriculum-based and clinical assessments should be primarily used to inform Differentiated Instruction for students based on their talents, strengths and needs, and not as a means to prematurely "remove" students from accessing the provincial curriculum/and or age-appropriate regular education classroom based solely on diagnosis and identification...*

*Assessment expertise by qualified individuals and sensitivity to specific learner needs and disabilities needs to inform the multi/trans-disciplinary team planning and monitoring process with regard to appropriate program and placement options...*

*... Inclusion and Universal Design for Learning principles extend beyond formal classroom learning to multiple experiences including outdoor and experiential learning, social and recreational activities, extra-curricular, community engagement and specialized pathways to success.*

We support the Ministry taking this direction.

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*Curriculum and instruction recommendation:*

15. *The Ministry of Education, Boards, schools and Faculties of Education ensure student voice, lived experiences, student participation and engagement in ongoing curriculum learning and assessment experiences, ensuring opportunity to create person-directed learning and transition plans, and full access to pathways/destinations.*

As mentioned above (see Learning resources and self-assessment recommendations) include a reference to involving the parents of those students who cannot express their needs/views themselves.

*Assessment and accountability recommendation:*

16. *That the ministry, educational and clinical school board staff commit to policy, processes, and provision of alternative, timely, flexible assessments for students with disabilities to ensure fair, equitable and barrier-free assessment of student performance and learning.*

This is an example of where the Ministry can back up its action plan with tangible support, by ensuring an adequate number of professionals qualified to do the assessments. A lack of such professionals is noted in French language school boards and remote regions. Assessment tools should be reviewed and updated as our understanding grows.

Often, board-level "experts" are making old assumptions and using outdated standardized tests. For example, "stimming," which we understand now as a self-regulating response to an environmental challenge common amongst people with autism, is still being inappropriately labelled as "dysregulation."

# EARLY AND ON-GOING ASSESSMENT FOR STUDENTS WITH DISABILITIES' NEEDS RECOMMENDATIONS

*Students with disabilities can face difficulties and significant delays in getting professional assessments, (including but not limited to psycho-educational assessments), where needed, for their disability-related needs.*

*Additionally, there is the potential for unfair/biased assessment for some students with disabilities due to a lack of understanding of the students, their lived experiences and identities and can lead to misinterpretations that create unintentional new barriers to an accessible and inclusive education for students with disabilities. The lack of a necessary assessment can impede their access to needed services, and to effective accommodations of their disabilities.*

One flaw in the system is insufficient involvement of parents in the assessment process. Professionals mainly depend on the recommendations of the teachers and their observations of the student in the school setting. Parents can enrich and deepen the assessment with observations from and experience in the home setting.

Parental "exaggeration" is often cited when there is a discrepancy in performance between home and school; perhaps the difference is simply because there are supports for success at home that aren't provided at school.

***Assessment and accountability recommendation:***

17. *The Education Accessibility Standard directed through Ministry of Education and Boards establishes measures and processes to address and eliminate administrative and other access barriers that impede or delay timely and fair/ unbiased assessments for the identification of disability related need. These assessments include but are not limited to professional and clinical assessments such as psycho-educational, and other educational assessments in the identification of disability related needs.*

17.1 *Where there are barriers related to timely access to identification or needs assessments, the board will have a solution-based process to address the assessment needs which may include a plan to access clinical assessments through partnership with external service providers. And where the board provides evidence to the ministry that it is experiencing barriers to timely access of clinical professional services for assessment related to the identification of disability related needs, and the board continues to plan for a clear solutions-based process, the ministry will support the board in securing the necessary assessments.*

The Ministry should ensure the implementation of recommendations side by side with assuring the necessary funds. There is a real ethical question here: Is it fair to assess the implementation of recommendations for which there is no material (funding, personnel, other resources) support?

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*17.3    Pending a necessary assessment, the school board has a duty to accommodate and cannot refuse to accommodate a student's need due to delay in getting an assessment performed that has been requested by the board. There are many educational assessments including on-going evidence-based classroom assessments that can inform how a student learns best.*

Agreed. However (and unfortunately), schools sometimes barely accommodate those with by-the-book assessments, much less those whose need is obvious yet who have been unable to acquire, for example, the diagnosis the Ministry requires as proof of need for the IPRC process and additional funding.

## INTERACTIVE COMMUNICATION IN ACCESSIBLE LEARNING ENVIRONMENTS RECOMMENDATIONS

*There is a need to recognize and celebrate students' voice, personal experiences, and family voices as authentic sources of (self) knowledge reflected in co-negotiated program and personalized planning, leading to progressive curriculum, assessment, and instructional design.*

Agreed! We appreciate the repetition in this document of this important point of inclusion.

The learning environment needs to create spaces for shared learning where all students, including those with diverse learning needs can identify and celebrate their heritage, culture, and identity, for example, ongoing development of provincial curriculum and supports that respect individual disability needs and learning contexts.

***Assessment and accountability recommendation:***

*19.   Online learning environments and on-line resources supported by ministry and Boards facilitate learning and engagement with others:*

*19.1    Through alternative mechanisms by which information exchange, collaboration, and learning can take place*

*19.2    These learning environments provide accessible curriculum and assessment-informed instructional strategies for a wide range of abilities and needs that students have*

*19.3    The design of these learning spaces be as flexible as possible to accommodate those needs and preferences*

How this is to be implemented will be the crucial point.

Again: Material support!

## ACCESSIBILITY HUB AND SHARED PRACTICE RECOMMENDATIONS

*There is a gap in knowing what accessible, equitable, and inclusive curriculum, assessment, and instructional resources have been developed within school boards, but may not yet been shared widely including in multiple, accessible formats...*

### Curriculum and instruction recommendation:

20. *A dedicated accessibility hub of continuously updated centrally located (for example, online) resources and research-based initiatives be developed and be openly accessible across education sectors. That the provincial government be responsible for facilitating infrastructure for accessibility hub frameworks across ministries, education sectors, and the public domain and that boards ensure students, families, educators and stakeholders have access to the resources.*

*Timeline: 18 months*

Such a broad approach is laudable and ambitious. It will certainly require a human-rights approach: i.e., looking at all initiatives and training through the accessibility lens. Assuring such a hub uses real-life examples and plain/friendly language will make it useful across the stakeholder spectrum. Neuro-atypical students often have neuro-atypical parents!

### Assessment and accountability recommendation:

21. *Research-informed culturally responsive pedagogy and assessment-informed practices be widely shared throughout district school boards through professional learning networks and online knowledge repositories, so that all students can be engaged in a fully accessible and strengths-based education that honours their learner identities.*

*Timeline: Immediate*

While an online repository is viable and extremely useful, training should be done in person as much as possible. In-person learning humanizes the abstract and supports participant understanding and follow-through on expectations.

Training begun (for example) in teacher's college and repeated regularly will cease to be "training" and become, simply, a skilled approach. Regular updates then become a matter of catching up with new research and findings and improved methodology.

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## TEACHING AND LEARNING ABOUT HUMAN RIGHTS AND DISABILITY RECOMMENDATIONS

*Students and staff are being taught about Human Rights and Accessible Education in a variety of ways, often in response to particular issues of exclusion and marginalization.*

*A more systemic and integrated approach to embedding Ontario Human Right Code and Accessibility for Ontarians with Disabilities Act, 2005 throughout the curriculum, instruction and assessment should provide a barrier-free education for students with disabilities.*

*Access to shared curriculum resources that address lived experiences of those with disability, resources and expertise (for example, inter-ministry, community developed resources, association sources, working documents), helps to develop accessibility and inclusion awareness, knowledge and skills.*

***Curriculum and instruction recommendation:***

22.  *The ministry and Boards ensure that provincial and alternative curriculum and instruction focused on a fully accessible education for students with disabilities include lived experiences of persons with disabilities, and instruction disability rights, Ontario Human Rights Code and Accessibility for Ontarians with Disabilities Act, 2005 requirements.*

***Timeline: six months***

Agreed! However, students with high needs are ignored here. How will a non-verbal student with significant autism participate in this activity? It must begin with presumed competence, and their families should be encouraged to be a part of the learning process as well.

**NB:** See also the *Convention on the Rights of Persons with Disabilities* and the *Canadian Charter of Rights and Freedoms*.

It is excellent to see included here specific teaching around the *Ontario Human Rights Code* and the *Accessibility for Ontarians with Disabilities Act, 2005*. Staff often believe that special education expectations are "flavour of the month" rather than stemming from legislation. (See comments on 21, above.)

It should always be stressed that accessibility is a human right; and that "new" instruction and training is based not on changes in those rights but on new research findings and better methodology. "Special education" is not "special" — it is education that is accessible, inclusive and good for each and all.

### Physical Health and Wellness

*Regular participation in physical activity develops body composition, skeletal health, and contributes to the prevention or delay of chronic disease.*

*It also improves several aspects of psychological health including self-esteem and promotes social contacts and friendships... it is therefore important that children and young people accrue sufficient physical activity.*

It so often happens in schools that special-needs students are allotted small and scattered blocks of time (when the gym is not being used by "regular" students). This is neither adequate nor efficient; nor is it equitable. There should be regulated and regular access to the gym for special needs classes with dedicated teaching, if not with then at least in collaboration with a qualified physical education teacher.

At the same time, gym class is often the locus for "integration" — and gym class is usually (in the absence of a specialized phys-ed teacher trained in accessibility) the most confusing of class periods, involving high sensory load and social involvement and frequently changing rules. (Disabled students with good gross-motor skills would be better off joining school sports teams, which might be added as a recommendation here.)

There is data proving the essential nature of physical activity in the lives and education of children and youth with an autism spectrum disorder. Consider the following, cited from Brown, D. M., Arbour-Nicitopoulos, K. P., Martin Ginis, K. A., Latimer-Cheung, A. E., & Bassett-Gunter, R. L. (2020). Examining the relationship between parent physical activity support behaviour and physical activity among children and youth with autism spectrum disorder. Autism, 24(7), 1783-1794:

Regular PA participation can provide a wide range of physical and mental health benefits that extend beyond the primary condition-specific symptoms children and youth with ASD experience (Biddle et al., 2019; Poitras et al., 2016; Wong et al., 2015). From a public health perspective, PA is a cost-effective intervention that is relatively easy to implement in most environments. Despite evidence supporting the benefits of PA, a recent systematic review of five studies found children and youth with ASD generally engage in less PA than their neurotypical peers (Jones et al., 2017). Research indicates PA patterns are similar among children with ASD and their neurotypical peers until 5–7 years of age (Ketcheson et al., 2018; Thomas et al., 2019), where at this point differences begin to mani- fest through middle childhood and become more pronounced during adolescence (Healy & Garcia, 2018; Healy et al., 2018; Healy, Aigner, Haegele, & Patterson, 2019; Ratcliff et al., 2018; Stanish et al., 2017).

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*Curriculum and instruction recommendation:*

25.1  *The ministry make available to Boards coordinated resources, guidelines and materials that effectively include students across all disabilities in physical, health and wellness programming within and beyond the school environment (for example, physical education, health education, sports, co-curricular activities)...*

This is desirable and very important. For the autism population, gender identity and sexual orientation (including asexuality) are very important topics.

25.2  *The Boards incorporate in its physical, health and wellbeing program activities that enable students across all disabilities be included, to participate and engage in healthy physical activity... This includes accessibility for all students through individual engagement in physical activity, co-curricular and participation through necessary communications such as captioning, interpreting and virtual means.*

Individuals with significant autism are frequently among those (mentioned above) who do not get adequate physical activity/education.

See Wouters, M., Evenhuis, H. M., & Hilgenkamp, T. I. (2020). Physical fitness of children and adolescents with moderate to severe intellectual disabilities. Disability and rehabilitation, 42(18), 2542-2552.

25.4  *The ministry and Boards provide Adapted Physical Education (APE) by developing, implementing and monitoring carefully designed physical education programs for students across all disabilities, based on comprehensive assessments, so that students with disabilities develop skills and competencies to enable healthy personal living.*

We strongly support this recommendation.

*25.5 The ministry and Boards expand the curriculum specifically about mental health to provide balance and connection with physical health and well-being for students with disabilities to support the whole child/whole school approach to student achievement and well-being…*

Many schools include the student council in the planning of support for mental health, inclusion, etc. The Ministry must envision a sharing of successful practices from schools across the province. Adults can learn a lot from students — and students are, after all, our future decision-makers. In addition, on the topic of "whole child/whole school," the possibility of past, school-related trauma in both students and their parents must be taken into account. There are many for whom just walking through the door of a school is triggering.

We recommend the following document for autism-specific information on student mental health: https://www.yorku.ca/health/lab/ddmh/wp-content/uploads/sites/407/2021/04/Mental-Health-Literacy-Guide-for-Autism.pdf

## SPECIALIZED ALTERNATIVE AND EXPANDED CURRICULUM AND PATHWAYS RECOMMENDATIONS

***Curriculum and instruction recommendation:***

27.  *The Ministry of Education review, develop and provide alternative and expanded curriculum and learning expectations that support the specific learning needs of students with disabilities in access and use of learning resources.*

27.1  *This includes the requirement of specific curriculum, and/or recommended resources for students with disabilities, that address **or** are tailored to the needs arising from the student's disability or combination of disabilities.*

Consider carefully, and challenge, the common practice of segregating students with "behaviour issues" in a separate classroom.

First, what is triggering the behaviours? Better teacher-training and broader accommodations may well reduce them.

Second, being surrounded with behaviourally challenged peers deprives these students good role models.

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*28. Boards ensure students with disabilities who participate in specialized and expanded programs receive the required adaptations to instructional design and assessment practices so that they have every opportunity afforded them to earn a diploma albeit 16 credits for an Ontario Secondary School Certificate (OSSC) or 30 credits for the Ontario Secondary School Diploma (OSSD)...*

Adult learning centres seldom provide the kind of supports disabled students might require, in cases where they have "aged out" before achieving the required number of credits to move on. This may be covered in the Transitions document but it bears saying here that the option provided in some U.S. states, of remaining in high school up to age 22, might be offered.

## SECTION 4: DIGITAL LEARNING AND TECHNOLOGY

*The rationale and motivation for the recommendations of the Digital Learning Technology Group relates to the need for school boards and government ministries to remove systemic barriers for the inclusion and full participation of student and staff in the school community.*

*In the context of digital learning and technology, this requires that boards and government ensure all digital resources are fully accessible to students and staff with disabilities. The recommendations also address training and funding barriers that boards, in particular, face to ensuring the proper use of digital learning technologies...*

We urge the Ministry to support school boards in such a way that each one doesn't have to find useful applications itself. Yes, public-school user licenses help as a starting recommendation, but it would be very helpful for the Ministry tech team to identify other apps or software that might be useful for particular student profiles.

The school-board tech team can take it from there, with input from school staff knowledgeable about and experienced with different disabilities/diagnoses. A Francophone team can do the same from applications available in French, as the quality of these vary greatly.

We also urge the Ministry to keep up-to-date with assistive devices/ programs/apps. Outdated equipment is a huge problem.

# SECTION 4 RECOMMENDATIONS

32. *Require school boards to consult with educators, parents/caregivers and students in the design of professional development and training activities in the use of accessible technologies.*

*Timeline: Immediate*

33. *Require boards to develop, implement, monitor and evaluate comprehensive training programs for its staff on procuring and using accessible digital technology.*

*Timeline: Six months*

34. *Require school boards to designate an accessible "digital accessibility lead" (a board-level staff appointment) that will support educators in the procurement and use of digital technologies and will be responsible for all digital information at the school and system level.*

*Timeline: Immediate*

Is there an unspoken "where budget allows" here? Will there be new funding for this initiative? Not all school boards will have the funds, staff or resources of time to fill a dedicated role, even part-time. The person to fill the role will have to have a background in both accessibility and IT, and competition for this specialization will created competition that may squeeze out smaller/poorer boards and institutions. More detailed support from the Ministry will help to fill these gaps.

Again, sensible (expanded) timelines will support this initiative and prevent cutting corners.

*Accessible digital and technology action plan:*

*Rationale: many school boards do not have policies, procedures or practices to consistently meet the digital and technology requirements to support the learning needs of students with disabilities. This undermines student achievement and well-being for those students. Given the scope of this recommendation an extended timeline is needed.*

35.11 *A school board shall not use PDF format for documents to be used by or in connection with students or their parents unless an accessible alternative format such as MS Word is also simultaneously available, including, for example, for any textbook or other instructional material, school or ministry policy, or student-related document such as report card or Individual Education Plan. For example, if a textbook is available in EPUB format, the textbooks must meet the international standard for that file format. For EPUB it is the W3C Digital Publishing Guidelines currently under review. 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.*

This seems excessively doctrinaire.

There's nothing inherently inaccessible about the PDF format, and they are often converted from Word documents anyway.

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*35.12 Ensure that students who are provided assistive technology for use at school can also take them home for home use as well.*

Yes!

This is so important to equity in accessibility, and not currently practised consistently from board to board.

*35.13 School boards remove any barriers that prevent students with disabilities from fully accessing adaptive technologies such as restrictions on being able to install apps on laptop computers or mobile devices, or firewalls that restrict access to websites needed to facilitate the use of adaptive technology.*

Guidance is needed to spell out who is to be responsible for the implementing of both this high-profile and complex process.

Will it be the new Digital Accessibility Lead, the board's IT department, or failing that, an outside consultant? Is there a formal checklist against which the implementation can be measured? Both should be specified here.

***Recommendations for the Ministry of Education:***

36.  *Ensure the Ministry of Education provides sufficient long-term funding through the Grants for Student Needs (GSN) to support boards in acquiring and supporting assistive technologies and related hardware and software via enhancements to the Special Education Grant. This should also include funding for any student with any kind of disability defined in the Ontario Human Rights Code and Accessibility for Ontarians with Disabilities Act, 2005.*

*Timeline: immediate*

*Rationale: a joint effort to develop a set of pre-service, in-service and board level training and professional development programs will promote a consistent and leading edge set of practices for ensuring students with disabilities have the tools and supports needed for their learning and well-being. Assisting boards in developing training programs and tools to measure student progress will ensure consistent progress is made and documented.*

37.  *Training programs to support boards:*

37.1 *Develop resource documents, case studies and training modules in collaboration with experts in adaptive technology, students with disabilities, trustee associations, teacher federations, the College of Teachers and Faculties of Education in the use of accessible technologies.*

37.2 *Provide school boards resources to support professional development in assistive technology, its application and Universal Design for Learning for school board staff;*

37.3  *Assist boards in developing a process for evaluating the effectiveness of training as it frequently relates to student outcomes, teacher knowledge and skills*

37.4 *Require training models for school boards to address student training needs for all students receiving assistive technologies 37.5. develop student outcome measures using tools as QUIAT and SETT and document within each student's Individual Education Plan.*

37.5 *Develop student outcome measures using tools as QUIAT and SETT and document within each student's Individual Education Plan.*

*Timeline: One year*

Further definition of terms is needed here — what are QUIAT and SETT?

We support the inclusion of direction on evaluating results and documenting them in an IEP. Regarding the timeline, training in these processes should start with the first year of teacher education and continue every year.

Because the execution of this recommendation will involve many institutions, a two-year timeline is more realistic.

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*39. Digital learning and technology barrier: Both during and after the COVID-19 pandemic, virtual classroom events and virtual meetings with students, parents and school staff are now common and will likely remain a fact of life in the future...*

*Timeline: Immediate*

We understand that when it comes to distance learning and virtual classrooms, for many reasons, not everyone has access to the same technology. Autism Ontario's 2020 Readiness for School Report is quite pointed about the issue. It cited that Northern Ontario Residents were eight times likelier than Toronto residents to report Internet bandwidth limitations as a barrier to online learning.

As well, differences in rural vs urban service challenge Internet access across the province. Living a few kilometers outside of town, in places just two hours away from Toronto, can mean worse and more expensive service.

Autism Ontario also notes with interest the announcement on August 11, 2021 that the Federal Government and the Province of Ontario will invest $14.2 million to improve broadband infrastructure in selected northern and indigenous communities. This initiative will certainly improve circumstances for those who live in those communities. There are many others who are still not serviced adequately, however. We recommend a roll-out of this program to ALL northern and indigenous communities.

There is also the factor of digital literacy and the divide it creates between those who are able to use the technology and those who are not. Not all children and not all families will have the same level of digital literacy. We need to ensure that all learners and teachers have the same digital vocabulary in order to be available to teach and learn, wherever they are. This also needs to be addressed in the final recommendations.

Finally, while monitoring and gathering feedback on accessibility issues is an excellent idea, there is nothing here that says what must be done with the feedback — how it is to be acted upon and the measurement processes involved.

There is also the factor of digital literacy and the divide it creates between those who are able to use the technology and those who are not. Not all children and not all families will have the same level of digital literacy. This also needs to be addressed in the final recommendations.

With all these factors involved, an "immediate" timeline seems overly optimistic.

**This content of this section is excellent, bold and necessary.**

The level of detail almost drowns the most important requirements for success in this area, which include clarity, consistency, measurability and accountability.

The latter needs to include the measurement of parent/student satisfaction and an outcomes component; otherwise, school boards will set very general and easy-to-achieve goals.

We are particularly eager to see the inclusion of a recommendation for third-party, impartial assessment in the accountability process.

*The initial consultation for the Education Accessibility Standards identified a significant number of organizations barriers, particularly concerning special education processes such as the Identification, Placement and Review Committee and the Individual Education Plan processes.*

*Parents raised concern about their lack of meaningful participation in these processes.*

We agree that this is a concern. It would help to define "parent participation." Simply sending home a questionnaire or draft copy of an IEP and asking for input isn't always enough. Consider parents who struggle with the official language used or simply don't understand educational jargon.

They will feel much more engaged when meeting face-to-fact, with the necessary translations and comfort level to ask questions and give input. Include virtual meetings in the list of acceptable meeting formats, with all the accompanying supports. In a "back to school" survey we did, we learned that some parents preferred this option, which does not involve transit time or the securing of childcare.

IEPs need to include specific, measurable supports: for example, with EA support, when, where, for what, for how long, etc.

The IPRC continues to play an important role in special education even though it is noted that more than 50% of students who receive special education services or programs do not have an IPRC. How are these data reported and used to ensure adequate support?

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

*Barrier: the initial consultation process and the review of relevant documents highlighted the disconnect between the Canadian Charter of Rights and Freedoms, Ontario Human Rights Code, the Accessibility for Ontarians with Disabilities Act, 2005 and the Education Act and related regulations. In part, this reflects the development of regulations under the Education Act for students with disabilities prior to the Ontario Human Rights Code and the Accessibility for Ontarians with Disabilities Act, 2005. Significant areas of difference relate to the rights of students who are determined to be "exceptional" under Regulation 181/98, Identification and Placement of Exceptional Pupils. The categories of exceptionality do not directly relate to the Ontario Human Rights Code definition of disabilities and this means that some students with disabilities are excluded from the right to special education programs and services. It creates a two-tier system.*

*In addition, the word "accommodations" has two different meanings in education and in a human rights context. Under the Ontario Human Rights Code, a person with a disability has a right to "accommodations" to prevent discrimination to the point of "undue hardship" of the service provider. In education, the term is used in reference to assessment, environmental and instructional accommodations for learning. This discrepancy needs to be addressed with a common definition and understanding.*

We strongly support the referencing of AODA, OHRC, CCRF and CRPD (to which Canada is a signatory) in educational planning. We agree that terminology must be clarified and regularized. Definitions of exceptionalities need to be updated in order to ensure all students with additional education needs are identified and not excluded.

It bears remembering that, regardless of the definition, the duty to accommodate includes both a procedural and a substantive component. So, in education, it isn't enough to collect information and write up an IEP (procedural); there must be implementation, monitoring and adjustment, as well (substantive).

Consider that there is currently no accessible dispute resolution mechanism in place under the Education Act and the OHRC. Not all matters are subject to review under the EA, there are significant systemic issues related to the human rights system (most notably associated with the timeliness of adjudication) and most people and families are unable to afford retaining an advocate/lawyer. Consider exploring a dispute resolution process similar to that under the Mental Health system where adjudication/resolution before the Consent and Capacity Board is timely and accessible. Note:

The Board comes to the applicant — hearings are usually held in at the hospital/facility where the person is being treated.

Rights advice — everyone is entitled to receiving rights advice within 24 hours of being involuntary admitted to hospital. The Rights Advisor assists the patient with completing the required appeal forms.

Legal representation — almost everyone filing an application before the Board is entitled to a lawyer funded by Legal Aid Ontario.

Timeliness — hearings must take place within 7 days of the application being filed with the Board. Decisions of the Board must be issued within 24 hours of the hearing. Written reasons for the decision must be issued with 4 days of the request.

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

*Barrier: the following recommendations have been developed to address the challenges faced by students who need services from the community in order to access learning and participate effectively in the school life...*

It is especially important to make sure that information flows both ways; i.e., that service professionals in other areas received training in school/educational services. We appreciate that this document focuses on transition planning as being an area most in need of inter-ministerial coordination.

41.3    *The documentation of plans to support students at school be integrated, building on the effective practices related to single plans of care and using the Individual Education Plans as the key document for students with disabilities who need accommodations and other programs and services at school...*

Valuable models of collaboration have been developed over the years, including the SSP program and the Connections for Students models.

However, regions/boards are inconsistent in their implementation of these models. Is there a plan in place to encourage boards that may be reluctant to adopt such models and support their efforts during the adoption process?

41.8    *An education advisory committee on autism should be established and include stakeholders from the education sector, Ministry of Children, Community and Social Services, Ministry of Health, parents and autistic individuals consistent with the recommendations from the Ontario Advisory Panel Report (2019). The scope of the role of the committee is described in the detailed recommendations for a new needs-based Ontario autism program, alignment with other ministries - Ministry of Education, Page 33-39.*

*Timeline: immediate*

41.9.   *The recommendations from the Ontario Advisory Panel Report (2019) regarding mental health services be implemented. In particular, the recommendations on capacity building amongst school staff about awareness of the mental health needs of students with autism, intervention strategies and the referral pathways for community support. (Alignment with Other Ministries - Ministry of Health page 40 to 46).*

*Timeline: Six months*

We applaud the inclusion of the Ontario Advisory Panel Report (2019) and suggestions on using it as a guide.

We must avoid reinventing the wheel 72+ times.

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*41.10 Dispute resolution mechanisms be developed at the student, school board and provincial level regarding access and delivery of student support services from provincial and community partners. The dispute mechanism for students and families should be user friendly and provide timely decisions, building on the approaches provided by the Supporting Success, A Guide to Preventing and Resolving Disputes Regarding Special Education Programs and Services (2007). The process for resolving systemic disputes should be solution focused and include accountability mechanisms to ensure follow up and evaluation of solutions provided.*

*Timeline: Six months*

We suggest the addition of a further recommendation: that students who require and receive third-party health and social services supports consistent with the Ontario Human Rights Code and which have school-based applications shall be entitled to receive said supports directly and/or in a consultative manner upon written request from the parent, or the student if the student is of sufficient age and mental capacity to grant such a request.

Individuals with ASD learn best in their customary environment, as the generalization of new skills in new environments is difficult. Adaptations and accommodations should be made in the student's neighbourhood school and among age-appropriate classmates. We respectfully submit that special attention be paid to the evidence-based merits of ABA, AAC and the like. Even when the will is there for practitioners and trainers to actively provide service in schools, there is often pushback from schools, boards and unions. An appropriate dispute resolution mechanism, available to all boards, would greatly help!

***Accountability recommendations***

**Barrier:** *a significant barrier that has been identified by families is the lack of accountability for the implementation of policies and regulations and the delivery of programs and services to students...*

Accountability and oversight measures should be impartial, objective, and consistent across all schools and boards, and those accountability and oversight measures should be reviewed on a regular basis (at least annually).

***Individual education plans recommendations***

Barrier: *currently, students with special education needs are entitled to have an Individual Education Plan. This right should be extended to all students with disabilities...*

43. *The Ministry of Education shall mandate that any students with disabilities their disability have the right to an Individual Education Plan and should be provided one by their school board to ensure that students with disabilities obtain the accommodations or programs and services needed to support their success at school.*

We suggest that "should" in the above be changed to "must," in order to avoid any possibility of misinterpretation.

44. *The Ministry of Education shall revise the format and content of the Individual Education Plan to include accommodations, as defined by the Ontario Human Rights Code, as well as supports or services that a student with disabilities needs to enable them to fully participate in and fully benefit from all opportunities available at school. It should include accommodations, supports or services in relation to all aspects of school life, including those needed for education and learning, for emergencies, for health and safety, behaviour or social engagement.*

    *The aim should be to consolidate to the extent possible all such planning for the student in one place. The portions of the Individual Education Plan that are needed to be shared with specific school staff members to implement them shall be shared with those staff members. Otherwise, the student's confidentiality in connection with the Individual Education Plan shall be maintained.*

*Timeline: Six months*

45. *The Ministry of Education make changes to the Individual Education Plan content and format, and the method of reporting to the ministry about students with an Individual Education Plan, to ensure that consistent and comparable data can be collected and aggregated from all school boards. (See also Section 6 Recommendations about Data Collection).*

Students with autism often have to move to among different learning environments each week as they access educational support services — for example, ABA programming. Transitions and change are difficult for most children, especially those on the autism spectrum.

Parents carry extraordinary burdens when accessing out-of-school support services: paying for daycare during school hours, while other children are in school; driving them from a daycare/home site to school, when others take a school bus; brokering communication between among the school and service professionals. Such burdens are greater than those of parents of typically-developing students or with other (developmental, physical) special needs.

One suggestion from the AO community is to add a first-page "cheat sheet" to the IEP, giving an overview of student strengths and needs, preferences, triggers and comforts, interests outside of school, etc. — a "whole person" report that would guide understanding of IEP specifics.

It does feel to us that the educational community has been talking about the shortcomings/challenges of the IEP for decades, and that a real examination of the entire process and possible solutions continue to elude the system. Questions around SMART expectations, lack of uniformity among school boards, lack of meaningful input from parents and external service professionals, lack of comprehension about the process and the document itself, and how to translate expectations to everyday school life are not new! Will this document be the force that provokes real improvement?

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46. Each school board **should** notify the parents/guardians of students with disabilities, and where applicable, the students themselves, of their right to have an Individual Education Plan. All students with disabilities who want or need an Individual Education Plan shall have one provided.

Again, we suggest "should" be changed to "must" here, to avoid any possibility of misinterpretation

47. The Ministry of Education shall publicly report on what changes have been made to the standards for Individual Education Plans, and regularly audit school board Individual Education Plans for compliance with the new standards.

Timeline: Six months

Agreed; and we strongly suggest that the new standards are developed with cooperation from the permanent advisory panel mentioned in Recommendation 42.4, and that any recommendations made by the panel are unedited and made public as these recommendations were.

48. School boards shall conduct annual audits of Individual Education Plan compliance and publicly report on the results of the audit.

We strongly recommend that **school boards shall engage in external third-party annual audits of Individual Education Plan compliance.**

## PARENT AND STUDENT PARTICIPATION RECOMMENDATIONS

49.8 Ensure that each school shall send home an introductory pamphlet, or equivalent, to all parents/guardians at the start of each school year, or when first registering a student in the board, and not only to families of those students who are already being identified as having a disability.

Perhaps do this in two ways, online and on paper. This speaks also speaks to the need to better utilize technology where/when appropriate as a tool for eliminating barriers, both in terms of cost and accommodation; as a simple example, someone with sight issues may prefer an online document in order to take advantage of software that can read the document back to them.

*49.9 Ensure provision of in-person and virtual events to help families learn how to navigate disability-related school board processes. Where possible these should be streamed online and archived online as a resource for families to watch at a convenient time.*

*Timeline: Six months*

*49.10 Ensure an effective process for parents and guardians of students with disabilities, and, the students themselves, to effectively take part in the development and implementation of a student's plans for meeting and accommodating their disability-related needs, including (but not limited to) their individual education plan.*

*Timeline: Six months*

*49.11 Consistent with the Ministry of Education policy recommendations, parents and guardians and students with disabilities must be invited to take part in a all school planning meetings, including meetings where accommodation plans will be made and where the individual education plan will be developed or reviewed. Such meetings should include the following:*

We recommend that support staff such as EAs, CYWs, DECEs, etc, be included as critical members of the teams who often have the most helpful information.

*f.  If a school board refuses to provide an accommodation, service, or support for a child's disability that a parent, guardian, the student requests, or if the school board does not provide an accommodation or support that it has agreed to provide, the school board shall be required to promptly provide written reasons for that refusal. It should let the family and student know that they can request written reasons.*

We strongly support the specification of a written refusal, as this forms the basis of dispute resolution.

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*49.12 Consistent with the recommendations for a Ministry of Education policy on student and parent engagement, a school board level dispute resolution mechanism is available to parents of students with disabilities, and to those students, for concerns related to accommodations, including individual education plans.*

*The dispute resolution process shall be:*

   *a. Fair, independent and impartial*

   *b. Respectful*

   *c. Non-adversarial*

   *d. Timely*

   *e. Accessible*

   *f. One where the decision is provided in writing.*

We commend the detailed recommendations for parent inclusion.

Often, parents are at a disadvantage in the appeal process, because adjudicators tend to favour establishment groups, in this case the school board. Even with an "impartial" process, as suggested above, the process contains many barriers, particularly for those who have experienced adversarial relationships with schools and boards.

We strongly support the existence of an accessible, publicized dispute resolution mechanism. Parents should not have to hire human rights lawyers to help them get through the bureaucratic barriers that often exist in school boards, causing delays that impact children's education.

*49.18 Ensure the training and development of a roster of helpers (sometimes known as system navigators) for parents of students with disabilities to help them navigate the often-complex world of supports for students with disabilities both within the system and with partner community agencies.*

*Timeline: Six months*

These assistants must be neutral (not necessarily a board or agency employee) in order to provide unbiased information in guiding parents.

Will parents be allowed a system navigator of their own choosing? For example, education system navigation groups such as Parents of Black Children.

*The Ministry and District School Boards shall:*

*49.20 Collate effective practices for enhancing student and parent involvement from around the province and develop a repository and/or mechanism to share the resources with school boards and make them publicly available.*

*Timeline: Six months*

We suggest that the sharing of said resources in a way that is publicly available assist in developing and enhancing educational standards.

# EXCLUSIONS/REFUSALS TO ADMIT TO SCHOOL / REDUCED SCHOOL HOURS RECOMMENDATIONS

*Barrier: Parents have concerns with the use of the principal's power to exclude students from school. (Also called refusal to admit to school) Section 265(1)(m) of the Education Act requires principals to:*
*"Subject to an appeal to the board, to refuse to admit to the school or classroom a person whose presence in the school or classroom would in the principal's judgment be detrimental to the physical or mental well-being of the pupils."*
*Concerns are expressed that a significant proportion of those excluded from school are students with disabilities...*

*Concerns have been raised that in some situations, a student with disabilities is excluded from school directly or indirectly because the school has not effectively accommodated that student, as is required by the Ontario Human Rights Code and the Charter of Rights.*

Is this due to lack of training, knowledge or support? Lack of human and other resources ("undue hardship"?) The Ministry, with the adoption of these recommendations, will be responsible for supporting school boards to ensure the elimination of exclusionary practices. This document, and particularly this set of recommendations, can provide impetus by replacing the word "should" with "shall" (which codifies intent for legislative purposes). Coupled with the document's references to existing human-rights legislation, the Province may in the end save money by engaging with injustice on a single front, rather than in individual, costly court cases.

51.    *The K-12 Education Accessibility Standards should require the following of any school board and of the Ministry of Education where it operates schools:*

51.1   *Collect data on students with all types of disability as defined in the Ontario Human Rights Code and Accessibility for Ontarians with Disabilities Act, 2005, …*

We earnestly hope that these data will serve to inform other Ministries about the reality in our schools. Assessments can't get done if there are no professionals available to do them. At times, the wait in certain parts of the province is years (2, 3, 4+), not days.

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51.6 *Collect information on the numbers of staff with specialized expertise relating to students with disabilities such as:*

    a. *Teachers of the deaf and hard of hearing*

    b. *Teachers of the visually impaired*

    c. *Applied behavioural analysts*

    d. *Speech-language pathologists*

    e. *Audiologists*

    f. *Physiotherapists, occupational therapists*

    g. *Assistive technology, and*

    h. *Other key personnel*

It is heartening to see these recommendations. **Professionals in these areas support improved collaboration** (see https://files.ontario.ca/mccss-special-needs-workforce-survey-summary-of-findings-en-2021-07-21.pdf) and a link to in-school "experts" is one avenue for that. We recommend that physiotherapy be separated from occupational therapy, as they are two different professions. Is there a reason that psychologists are missing from the list? And what happens with specialized experts who provide School Based Rehabilitation Services (SBRS) through the consultative model? They need to be considered as well, along with their contributions to accessibility accommodations and removal of barriers.

51.7 *Publicly report on an annual basis data related to disability, exclusions, modified day, wait times for professional assessments, and the number and types of staff who instruct students with disabilities*

Agreed, with the caution that data be presented in aggregate so that no individual can be identified.

**This needs to be explicitly stated**; 51.8 specifies aggregate data-gathering but not the removal of personally identifiable information, which is especially important in rural/smaller school boards, French Immersion or other specialized classes and with intersectional data collection. One measure that might be taken is to include data sets representing fewer than 10 people in an aggregate "Other" category that represents more than 10 people.

*Ministry of Education/Equity Secretariat shall:*

51.13 *Use disability information and analysis to identify gaps and develop plans to improve the outcomes and achievement of students with disabilities.*

Agreed, as long as such data collection respects individual rights to privacy as per 51.7 comments.

*52.11 Establish at each school an Accessibility Committee that would include the Principal or designate, staff, students, families, and community groups, to identify accessibility barriers and possible solutions to address them. The committee will provide input to the School Board Accessibility Committee and/or lead staff responsible for accessibility. This will ensure that accessibility barriers unique to each school are identified and addressed as quickly as possible.*

We strongly support this recommendation, while acknowledging that recruitment of volunteers amongst already-extended parents of students with disabilities will be even more challenging than usual! Perhaps a board-wide committee? Once on the ground, such Committees may be faced with a resource crunch, due to pandemic responses. Schools and boards have had to prioritize frontline education services and upgrades to ventilation and other HVAC equipment. Will they have access to funding for accessibility improvements in the coming years?

## PROFESSIONAL LEARNING RECOMMENDATIONS

*Barrier: The earlier sections on attitudes, technology and curriculum have identified the importance and value of professional development about ableism, accessibility, Accessibility for Ontarians with Disabilities Act, 2005, Ontario Human Rights Code and disability as critical to the effective education of students with disabilities. …*

*Ontario College of Teachers shall: …*

It is important to include awareness of and training in ASD in Education curricula. First, it is enriching: approaches and strategies that are effective for students with ASD are often effective for other students, as well. Second, the prevalence rate of ASD means all teachers will have an autistic student in their class, possibly more than one in any given year. Training about autism must be done on a large scale.

*District School Boards shall:*

*53.9   Provide opportunities for the development of advocacy skills to parents and students with disabilities.*

Agreed, with the caution that parents can sometimes find themselves in a conflict-of-interest situation. For example, Ed Mahony: He cannot participate in advocacy or consultation with parents in his school area due to his role as an ABA resource teacher in the Hamilton-Wentworth Catholic District School Board (HWCDSB). We must cultivate Ontario-wide arm's-length advocacy resources in order to mitigate this issue.

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*53.10 Develop resources and professional learning opportunities for teachers, and other staff, to better communicate with parents and encourage collaborative planning of Individual Education Plans.*

*53.11 Share best practices around fostering parent engagement with teachers and other staff.*

Again, the Ministry will be in the best position to curate such sharing, in order to ensure consistency in both discovery and application of best practices.

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

***Barrier:*** *the system for a school board's formal identification and placement of students with disabilities, Regulation 181/98 creates barriers for students with disabilities, beyond the fact that the definition of "exceptional pupil" does not include all students with disabilities as defined in the Ontario Human Rights Code, and the Charter of Rights. …*

54. *The identification, placement and review committee process and regulation should be reviewed to determine if it needs to be re-designed, retained or replaced.*

*Timeline: Six months*

55. *The review panel should include students or persons with disabilities, families, school board and Ministry of Education representatives.*

*Timeline: Immediate*

56. *If the identification, placement, and review committee process is to be redesigned, the following principles should be included: …*

Regarding Recommendations 54-56, the issue isn't with the IPRC process itself; it's inconsistency in application across boards and even within schools. This isn't strictly due to the variety and complexity associated with exceptional pupils. The vast majority of this is attitudinal and interpretive.

- Some boards and schools will happily accept third-party input and recommendations, whereas some will not.
- Some boards and schools will engage with parents as partners, whereas some will not.
- Some boards and schools have largely predetermined the placement of a child and are merely doing the bare minimum necessary in order to satisfy a Ministry of Education requirement, and some are willing to work with parents and third-party providers in the best interests of the child.

This is essentially a "best practices" conversation. The Ministry of Education needs to determine what schools/boards are engaging in practices with a child's best interests in mind, and then adopt and share them with the intent that they become universal practices.

Language around timelines can be made clearer and more prescriptive. When we say "reasonable timelines", how do we define "reasonable"? Are we referring to two business days or 4 to 6 weeks? The same thing applies to "prompt." Similarly, we must be clear about what is meant by and involved in "placement" and "programming" when it comes to accommodation. For example, an accommodation might involve the placement of a student in a particular program or classroom with a certain level of EA support. The parents agree to the IPRC, and then find that the EA support isn't there. On paper, an accommodation has been made; in practice, not so.

None of this necessitates a redesign of the process, but simply an updating and iterative improvement that addresses the shortcomings of the existing process.

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*The area of social realms is often overlooked as being an important part of education and should be seen as an integral part of the student's education and development.*

Hear, hear! Many have addressed this message and it is wonderful to see this statement in print. Recommending concrete supportive action is complicated, however. Even the many recommendations in this section seem limited. (Why the focus on transportation and service animals?)

"Social realms" should be viewed as encompassing ALL activity, both within and outside the classroom where social interaction among students is the vehicle for learning. Social learning is a testing-ground for so many other kinds of learning: cognitive, emotional, interpersonal and intrapersonal. It is enmeshed not only with another concern of this document, mental health (see Recommendation 25) but with the development of global competencies: critical thinking and problem solving, innovation, creativity and innovation, self-directed learning, collaboration, communication, citizenship.

That said, it seems to us that this section could go even deeper, identifying social learning as a subject equal in importance to numeracy and literacy, with an assigned number of minutes of instruction and dedicated curriculum (focusing on negotiating difference, which is an aspect of the Rick Hansen Foundation School Program); the provision of school board supports and resources, and Ministerial guidance and accountability.

## SECTION 6 RECOMMENDATIONS

### Educational and online events recommendation

57. *Each school board should only hold educational events at venues on school board property or outside school board property whose built environment is accessible to students and staff with disabilities. The buses used to transport students to the off-site events should also be accessible, so that students with disabilities do not have to travel to the event separate from their classmates.*

It is well to remember that inclusion starts at the planning stage, to avoid "and what about X-student-with-disability, and must include "spaces" for the invisible disabilities.

# TRANSITIONS FACILITATOR/NAVIGATOR RECOMMENDATIONS

58. *Each school board should develop and create the role of the Transition Facilitator/Navigator to work with students and their families in collaboration with school staff, and community agencies to explore pathways and develop transition plans. The Transition Facilitator/Navigator would assist students accessing special education supports, consult and liaison with community disability service providers and provide transition planning resource development for all school board and school staff. See description of role and responsibilities.*

*Timeline: One year*

We recommend that this excellent recommendation be repeated in the Transitions section, if it is not already included. Peel District School Board and DPCDSB have an well-functioning collaborative post-secondary Transition Advisory Committee with representation from boards, community, post-secondary education, the workplace, students and family.

Each board must have Transition Facilitators whose role is to promote more positive transitions for students with disabilities. Timing is everything: choosing options for post-secondary and beyond can seem overwhelming for a student in grade 8 and their family.

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59. *Ministry of Education should set up a centralized Transitions Hub. The hub would support the role of the Transitions Facilitator/Navigator as well as provide a conduit of best practice transitions information and regular communication from across all publicly funded school boards and school authorities in Ontario. If needed it would provide smaller boards the ability to partner and develop successful programs.*

*Timeline: immediate*

**Transportation recommendations**

60. *The obligations under this part of the standards should be binding, both on school boards and transportation consortia. Both parties have the duty to adhere to the standards and to work together to ensure that the rights of students with disabilities are honoured.*

*Timeline: six months*

*Rationale: up to three organizations may be involved in the transportation of students: A School Board, a consortium of school boards that jointly arrange for student transportation, and private bus companies that are contracted to provide bussing in that area. Students with disabilities and their parents should not have to try to figure out who is responsible for their child's transportation needs. The following should be required of all three organizations.*

61. *To ensure that students with disabilities get the transportation services they need to attend school this recommendation will set criteria for creating monitoring and accountability. The Education Accessibility Standards should require that where a school board provides bussing or other transportation services to students with disabilities in order to enable them to attend school, the school board/bus company's/transportation consortia shall review and develop policies and procedures that include…*

While we applaud taking a careful look at transportation issues and education accessibility, we wonder why it is included in the Social Realms section. It seems more properly to belong to Section Five (see comment on recommendation 44). This section could, however, focus on the social part of transportation and include accommodations needed to ensure social-emotional well-being while in transit (buddy systems/seat buddies, assigned seating, etc.) as well ensuring transportation to educational events/outings; i.e., recommendation 61.8. There might also be recommendations regarding training and the facilitation of positive experiences for students with less-visible disabilities, such as hearing impairment and ASD. Visual cues, trained drivers and other supports should be included in a Universal Design for transportation. School-bus companies can be called to account on responsiveness (for example, to complaints about drivers): there are some places where companies don't even answer their phone. Where taxis being used to transport students with disabilities to/from school, industry reps need to be included in accessibility-transportation plans and training.

## BULLYING/CYBERBULLYING WORKSHOPS RECOMMENDATION

64. *As a part of efforts to educate the entire school community about inclusion of students and school community members with disabilities, all school boards will develop and implement workshops to educate on and address bullying and cyberbullying in schools and the impacts that they can have on students' physical and mental health. These workshops need to be informed and facilitated by young persons with disabilities. The workshops are to be presented to all members of the school community.*

*Timeline: Six months*

It is surprising to us that such an important issue related to mental health and quality of life is addressed simply by "workshops." Workshops can be a good start but must be followed up with concrete and effective strategies to ensure all students, including students with disabilities, develop the tools necessary to prevent and address all types of bullying. Bullying and cyberbullying must be part of the "social curriculum" described in our general comments, above, and must highlight the special vulnerabilities of students with disabilities. Cross-curricular units (language arts and social studies) could include materials about bullying and students with disabilities: e.g., Perfect Targets, Asperger Syndrome and Bullying.

Certainly, ALL "awareness days" (World Autism Awareness Day, World Down Syndrome Day) could be observed, not just those relating to specific students in the class/school. Student councils bring unique energy and ideas to such observances. Today's students are tomorrow's decision-makers.

## EXPERIENTIAL / CO-OP LEARNING OPPORTUNITIES RECOMMENDATIONS

65. *Persons with disabilities face extraordinarily high unemployment rates. Getting the chance for an experiential learning or coop placement while in school can be the gateway, if not the only gateway, to that first letter of reference. Every student's first letter of reference is essential to getting their first job and more importantly, if you have a disability. Therefore, these recommendations are essential to combating the high unemployment that youth with disabilities too often happen to face. For the success of these recommendations, it is extremely important that school boards provide informal advice and support to all employers, including small businesses.*

Although there is a social aspect to this, this is very much part of transition planning, and can afford to begin even before high school. Perhaps divide the recommendations between this and Section Five, as transitions are mentioned in the introduction, and because learning experiences like these should be included in an IEP, with the sort of student and parent involvement described in Section Five. Include in Social Realms those learning opportunities that address relationship negotiation, and in Section Five, social competencies that influence success in transitions;, for example, "Learning expectations related to experiential/co-op opportunities must include social expectations designed to better prepare the student for transition to adult life, which should include employment."

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*To ensure that students with disabilities can fully participate in a school board's experiential learning programs, each school board should:*

*65.6. survey students with disabilities and experiential learning placement organizations at the end of any experiential learning placements to see if their disability-related needs were effectively accommodated.*

Experiential learning experiences must be adequately supported by trained school board staff e.g., EA, job coaches etc. Too often students are unable to access these experiences because there isn't enough support to ensure both their safety and a meaningful opportunity. In addition, ensure students have individualized skill development that adequately prepares them for their specific co-op experience.

## BULLYING/CYBERBULLYING WORKSHOPS RECOMMENDATION

*66. The Ministry of Education should provide templates or models for these policies and measures. It should be required to prepare and make available training videos for school boards and employers offering experiential learning programs to guide them on accommodating students with disabilities and the impacts in experiential learning placements.*

*Timeline: Six months*

Clear and firm guidance from the Ministry will ensure that recommendations are not interpreted differently by 72 school boards (not to mention school authorities).

*67. Each school board shall provide where needed or requested by a student with disabilities or their family, staff assistance for social interaction and play, particularly during unstructured or minimally supervised times, such as recess or lunch. This is to address social isolation that students throughout their educational journey from K-12.*

*The Individual Education Plan shall include a detailed, specific plan for how to implement and achieve social inclusion both in the formal school activities and informal parts of the school day. Creative and flexible plans should include multiple organizations or programs both inside and outside school board designed to foster inclusiveness in the long term across all levels from students to the administration.*

There is excellent peer-mentoring, social-skills, emotion-management and other programs available and being used successfully in Ontario, to inform curriculum and provide framework for practice groups. Some schools have implemented Positive Behaviour Support (PBS) programs, which explicitly teach prosocial behaviour. They are designed to be implemented school-wide, which ensures all students are involved and benefit; then, some students are given additional teaching, practice and support. Our document Social Matters can help guide interventions with these students. A survey of schools (and service providers) using such programs could be helpful in finding ways to encourage those who may feel less comfortable with social curriculums.

Regarding recommendation 67, we recommend that it be broken into three parts and each part expanded with keys to success.

1. Unstructured times: Highlight the social reality of such times, when very often staff are taking breaks and students are left to govern themselves at difficult times of the day. The Ministry can ensure funds are provided for break-coverage staff who have training in social development and support.

2. IEP: Include training on how to formulate SMART goals as they relate to the social realms. Social and behaviour goals are often worded vaguely, in ways that are impossible to measure, which leads to misunderstood and unmet expectations being carried over unchanged from year to year.

3. Multiple programs both inside and outside: It is natural, since all children go to school, to view a school as a central hub of children's activities. However, this puts a lot of pressure on schools to meet ALL student needs, often in the face of inadequate staff numbers and training. Inequities among services and supports continue to occur across the province; some boards simply have more external resources available to them in their region. Sometimes the response is to block all external involvement. In other regions, school boards have allowed third-party involvement but policies from third parties tend to exclude involvement of school staff. Some service-providing personnel come and go without connecting with any school staff! This is NOT collaboration.

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*Service animals (as per Accessibility for Ontarians With Disabilities Act, 2005 customer service standards) recommendation*

*Barrier: Some school boards or schools do not let students with disabilities bring a sufficiently trained service animal to school as an accommodation to their disability, either because the school board or school does not allow for this or lacks a proper policy to allow for this.*

*Some students on the autism spectrum and their families in Ontario have reported having difficulties at some school boards with being allowed to bring a service animal to school and have even had to take action before the Human Rights Tribunal against a school board. Others have been able to succeed without barriers in bringing their service animal to school.*

*68. We therefore recommend...*

Again, the matter of service animals seems more to pertain to Section Five (Organizational Barriers) than to Social Realms. That said, we agree that all school boards must develop a Service Animal Policy/Protocol that is in line with many that currently exist in province, for example, PPM163. PDSB has a comprehensive policy that was developed in collaboration with parents and service-animal organizations (such as National Service Dogs), which has been in existence for quite some time. We also affirm the provision of a trial or test period, because it forestalls an automatic "no" response.

# SECTION 7: PHYSICAL AND ARCHITECTURAL BARRIERS

*When it was passed in 2005, the Accessibility for Ontarians with Disabilities Act, 2005 required Ontario, including its schools, to become fully accessible to persons with disabilities by 2025.*

We are heartened that this Section seeks to improve buildings that are often designed primarily for adult convenience and not for children with disabilities. Currently, the Ministry leaves accessibility measures and decisions to school boards: the Ministry does not collect data on accessibility and there are no provincial standards for school design. There is definitely room for improvement here.

We acknowledge that it is challenging to address all disabilities (mobility, hearing loss, autism, intellectual impairment, visual impairment, mental health, etc) in recommendations for the removal of barriers in a school's physical plant, especially given that the pandemic has prioritized investment of educational resources in additional, unforeseen measures (HVAC, etc.). Nevertheless, recommendations in this area should always keep in mind less-visible disabilities, and those where mobility in not the issue.

The average age of school buildings as of 2016 was 39.4 years, with many dating back to the 1800s and early 1900s (source: http://www.edu.gov.on.ca/eng/parents/fci.html). As much as it would be ideal to preserve our older school buildings for heritage and historical purposes, this must not come at the expense of the education of today's students.

# SECTION 7 RECOMMENDATIONS

*Timeline: Six months for all recommendations*

This seems excessively ambitious.

## ENSURING A FULLY ACCESSIBLE BUILT ENVIRONMENT AT SCHOOLS RECOMMENDATIONS

*Barriers: Too often, the built environment where K-12 education programming is offered, have physical barriers that can partially or totally impede some students with disabilities from being able to enter or independently move around. These barriers also impede parents, teachers and other school staff and volunteers with disabilities.*

*The Ontario Ministry of Education does not effectively survey all school buildings to ensure that they are accessible, or to catalogue what accessibility improvements are needed.*

*The Ministry of Education's specifications for new school construction do not require all accessibility features or can even preclude needed accessibility features in a new school or other education facility.*

*Recommendations:*

69. *The K-12 Education Accessibility Standards should set out specific requirements for accessibility of the built environment in schools and other locations where education programs are to be offered. Accessibility requirements should not only include the needs of people with mobility disabilities. They should include the needs of people with other disabilities such as (but not limited to) people with vision and/or hearing loss, autism, intellectual or developmental disabilities, learning disabilities or mental health disorders. There should be no priorities among disabilities*

Agreed!

Thank you for stating this so clearly. All too often the needs of students with autism are shunted aside, whether in exclusion from certain classes or because there is no room (for example, a quiet space) in a school for specialized instruction or therapy.

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70. *Each school board should develop a plan to ensure that the built environment of its schools and other educational facilities becomes fully accessible to persons with disabilities as soon as reasonably possible, and in any event, no later than January 1, 2025.*

Agreed! However, the first step must be for the MOE to create a list of standards for accessibility (from these Recommendations) and to request that school boards survey schools and report back to Ministry on their accessibility status. The Ministry can then plan for funding projects/priorities and school boards moving forward to determine their priorities, create plans and implementing it.

In addition, consider replacing the term "quiet room" with something that reflects a more multi-purpose intention, such as "Alternative Learning Environment." This space can be used for 1:1 teaching, professional services/therapy (e.g., ABA, mental health counselling, SLP), student-selected "quiet time", multisensory experiences at the recommendation of OT, etc. PDSB has a document outlining standards for such rooms -- dimensions, lighting, etc.

71. *When a school board seeks to retain or hire design professionals, such as architects, interior designers or landscape architects, for the design of a new school or an existing school's retrofit or renovation, or for any other school board construction or other infrastructure project, the school board should include in any Request for Proposal a mandatory requirement that the design professional must have sufficient demonstrated expertise in accessibility design, and not simply knowledge about compliance with the Ontario Building Code or the Accessibility for Ontarians with Disabilities Act, 2005. This **includes the accessibility needs of people with all kinds of disabilities, and not just those with mobility impairments**. It includes the accessibility needs of students and not just of adults.*

Agreed. Be aware that many firms' knowledge begins and ends with mobility issues. MOE should have a list of accessibility standards (that includes both children and adults and disabilities) that is publicly available and explicitly shared with architecture and building companies bidding on MOE projects.

72. *When a school board is planning to construct a new school, or expanding or renovating an existing school or other infrastructure, a properly qualified and experienced accessibility consultant should be retained by the school board (and not necessarily by a private architecture firm) to advise on the project from the outset, with their advice being transmitted directly to the school board and not only to the private design professionals who are retained to design the project. Completing the eight-day training course on accessibility offered by the Rick Hansen Foundation should not be treated as either necessary or sufficient for this purpose, as that brief course is substantially inadequate and has significant problems.*

Agreed; and more clarity is needed here. What credentials and experience is an acceptable "accessibility consultant" expected to have? If the eight-day course mentioned above is not sufficient, are there examples of courses meet expectations?

The most recent Facility Condition Indexes (FCIs) for schools/boards were generated in 2017 and are nearing time of update. It makes sense, therefore, to have school/board perform accessibility audits as part of their updated FCI; it may also make financial sense to count accessibility upgrades as a subcomponent of facility condition, particularly when one considers the age of many school buildings. Priority consideration could also be given to schools with high FCI indexes generated from more recent FCI assessments, as the collective upgrades of those schools would be more expensive and less efficacious in terms of education delivery than to simply build newer schools with accessibility features already incorporated.

73. *A committee of the school board's trustees, and the school board's Special Education Advisory Committee or Accessibility Committee should be required to review design decisions on new construction or renovations to ensure that accessibility of the built environment is effectively addressed. A school's Accessibility Committee should also be involved in this review. Consultations should include getting input from students, parents, school employees and school volunteers with disabilities. These committees should not be seen as technical experts, or as a substitute for the earliest engagement of accessible design experts.*

It is excellent to include input from a variety of stakeholders. However, is it realistic to ask SEAC or school board committees to review all building, renovation or retrofitting projects in detail? Perhaps a single representative from a given school could do this; or a parent representative who reports back to a committee made up of students, parents and community members who are tasked with a checklist of essential elements.

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74. *Where possible, a school board should not renovate an existing school that lacks disability accessibility, unless the school board has a plan to also make that school accessible. For example, a school board should not spend public money to renovate the second storey of a school which lacks accessibility to the second storey, if the school board does not have a plan to make that second storey disability accessible. Very pressing health and safety concerns should be the only reason for any exception to this.*

This is a wise and bold recommendation, essentially stating that no renovation, build or retrofit that does not meet standards of accessibility set by the ministry may be undertaken.

75. *When a school board decides which schools to close due to reduced enrollment, a priority should be placed on keeping open schools with more physical accessibility, while a priority should be given to closing schools that are the most lacking in accessibility, or for which retrofitting is the most costly.*

Yes. Supports accessibility as a priority.

76. *Each school board should hold off-site educational events at venues whose built environment is accessible.*

An excellent recommendation that supports accessibility for all children and adults.

77. *The Ministry of Education should be required to revise its funding formula or criteria for school construction to ensure that it requires and covers and does not obstruct the inclusion of all needed accessibility features in a school construction project*

Another bold recommendation. School boards must abide by standards for building, renovating and retrofitting, which may not be overturned by funding decisions. In effect, either they do it right or don't do it at all.

## ENSURING ACCESSIBILITY OF GYM, PLAYGROUND AND LIKE EQUIPMENT AND ACTIVITIES RECOMMENDATIONS

78. *To ensure that gym equipment, playground equipment and other like equipment and facilities are accessible for students with disabilities, the Education Accessibility Standards should set out specific technical accessibility requirements for new or existing outdoor or indoor play spaces, gym and other like equipment, drawing on accessibility standards and best practices in other jurisdictions, if sufficient, so that each school board does not have to re-invent the accessibility wheel.*

Yes. Standards ensure consistency and efficiency. Regarding the inventory of equipment, it may be unrealistic to expect a SEAC, Accessibility Committee or the families of students with disabilities to consult on every purchase of gym equipment, etc. Perhaps a "recommended" list should be created, with input from these committees, parents and students.

80. *Where playground or other school equipment or facilities to be deployed on school property for use by students is funded and/or purchased by anyone other than the school board, the school board should remain nonetheless responsible for approving the purchases and ensuring that only accessible equipment and facilities are placed on school property for use by students or the public. Decisions over whether accessibility features will be included, or which will be included, should not be totally left to community groups which may fund-raise for such equipment or facilities.*

COVID has inspired the building of many new outdoor classrooms and it is important to apply the accessibility lens to these as well.

## SPECIFIC ACCESSIBILITY REQUIREMENTS RECOMMENDATIONS

We very much appreciate ALL disabilities (visible and invisible) are treated as equally important in these recommendations. It is important in the detailed recommendations that "good" examples be include, such as types of lighting or ways to reduce echo in sound, both of which are often distracting or irritating to students with autism. The promotion of Universal Design for physical layouts (e.g., wide doors, signage, ramps, elevators, good flow) is an excellent feature of this document, as it not only supports students with disabilities but is welcoming to families and visitors in the school.

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# RECOMMENDATION PART THREE: USABLE ACCESSIBLE DESIGN FOR EXTERIOR SITE ELEMENTS

## ACCESSIBLE DESIGN FOR INTERIOR BUILDING ELEMENTS – GENERAL REQUIREMENTS RECOMMENDATIONS

For all recommendations from 85 to 100, include reference to visual supports such as colour coding, and signage that includes symbols and pictures, where possible, to enhance Universal Design principles. At the same time, guard against visual clutter, glare, and sensory over-stimulation.

## ACCESSIBLE DESIGN FOR INTERIOR BUILDING ELEMENTS – CIRCULATION RECOMMENDATIONS

In recommendations 92 to 103, include references to types of lighting, specifically, the elimination of fluorescent lighting, which greatly irritates people with sensory sensitivities to light and noise.

## ACCESSIBLE DESIGN FOR INTERIOR BUILDING ELEMENTS – SPECIFIC ROOM REQUIREMENTS RECOMMENDATIONS

*101. Performance Stages*

*The following should be required:*

e. *Lighting shall be adjustable to allow for a minimum of lighting in the public seating area and backstage to allow those who need to move or leave with sufficient lighting at floor level to be safe.*

Ensure acoustics are optimal for ALL students and adults. At a minimum, each gym, music room or performance hall should be equipped with a sound field system and ceiling sound panels. Ideally, each classroom should be equipped with a sound field system. See https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4918678/

*102. Sensory Rooms*
*The following should be required:*

Policy and procedures (why the room is necessary; when and how it will be used; who will use it, maintain it, supervise its use, etc.) are essential here, as well as data collection on its use and ways to measure effectiveness. We recommend thinking more carefully about sensory rooms, in fact, perhaps designating them "Alternative Learning Environments," as sensory rooms should only be recommended, created and prescribed under the supervision of registered professionals such as OTs and PTs.  Not all children with autism need to use a sensory room and in fact in some cases they can have negative effects. It should not be the goal that all schools have a sensory room but rather a room, created according to recommended standards, that can be used for small learning groups, visiting service providers (e.g., psychology, SLP, SW) working 1:1 with students, AND adapted to be a sensory room if appropriate.

*107. Cafeterias*
*The following should be required:*

Please include a recommendation for the provision of quiet spaces for people with sensory sensitivities (noise, smells) as alternative areas in which to eat.

*109. Teaching spaces and classrooms*
*The following should be required:*

ALWAYS include a recommendation for a quiet area that students can retreat to instead of having to leave the classroom entirely. This will allow students to continue to be part of the class, maintain awareness of what is going on and participate in a way that is more conducive to learning for them.

In addition, ideally, classrooms, libraries and other learning spaces should be equipped with a sound field system. Visual supports such as signs, pictures and symbols, provided they do not become visual clutter, help to make the space more predictable and organized. See TEACCH research here:

https://www.appliedbehavioranalysisprograms.com/lists/key-principles-of-the-teacch-method/

And perhaps it may help to also recommend a "loud" area, in a separate space, as some children on the autism spectrum regulate themselves with sounds: screeches, clapping, music.

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*115. Public address systems*

*The following should be required:*

   *a. Public address systems will be designed to best accommodate all users, especially those that may be hard of hearing. They will be easy to hear above the ambient background noise of the environment with no distortion or feedback. Background noise or music will be minimized.*

And yet, students with students with auditory sensitivity must also be taken into account. PA systems, bells, alarms, loud music in (high school) hallways between class periods … all of these can be experienced by such students as sensory attacks.

# SECTION 8: PLANNING FOR EMERGENCIES AND SAFETY FRAMEWORK

We commend taking a proactive approach to emergency planning, as it has the potential to alleviate or minimize some of the issues we encountered and continue to face in the course of the pandemic.

There is no mention of student voice in the planning and decision-making process; will students be invited to bring their experiences and concerns to the table?

Finally, there's no mention of independent schools in the document; are they outside of the scope of the report? We hope that they will be included in any Province-driven initiatives and standards, as emergency preparedness planning affects all of society.

# SECTION EIGHT RECOMMENDATION

*The current COVID-19 pandemic has provided an opportunity to test and evaluate the education system preparedness for a large-scale emergency...*

***Section Eight Recommendations***

*By learning from innovations and emergency processes, systems can adapt and scale up the more effective solutions. In doing so, they could become more effective, more agile, and more resilient (COVID-19 Pandemic: shocks to education and policy responses, World Bank)*

*The current COVID-19 pandemic has provided an opportunity to test and evaluate the education system preparedness for a large-scale emergency...*

120.  *We recommend: The Ministry of Education review its Emergency Response Plan for the delivery of education and health services during an emergency that meets learning needs of all students with disabilities during an emergency. To ensure continued learning, health and wellbeing during an emergency event, this plan should include and incorporate:*

We are not done learning from our collective COVID pandemic experience! The Ministry of Education and school boards can have emergency plans but must follow local health unit guidelines and restrictions imposed by the government of Ontario. Having said that, comments heard around the province and shared on social media strongly suggest that each school board made its own decisions in the end. Students with special needs in some school boards were in school during school closures, while other students in other boards were not. Students in some special-needs classrooms were invited to in-person learning while students in regular classrooms were not — and some of those "regular" students were equally challenged by online learning. Regardless of the plan on the table, the reality of individual situations will affect accessibility. In the absence of a firm message from the Ministry — and active follow-up — the COVID pandemic situation may well repeat itself.

The pandemic made one thing glaringly obvious: the Province must make affordable, high-speed Internet access available to all residents. Our COVID-themed "Back to School" survey indicated the inequities of Internet access and technology that affect ALL students, across the province.

Our survey also highlighted the need for an emergency response fund that could help provide the families of students with disabilities extra support for in-home or alternative, in-school learning. Some school boards continued to provide in-school programming to students with developmental disabilities and/or autism. Look to these examples to see what did and didn't work.

In general, here, are the recommendations financially feasible?  Will all schools have the physical space to implement these recommendations (e.g., building size, age of building, design required for cohorting, adequate ventilation systems, windows that open)?

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123. *The Ministry of Education establish an independent review committee as soon as possible to assess the COVID-19 response by the Ministry of Education and School Boards by:*

   a. *Documenting the response by the ministry and school boards to supporting students with disabilities.*
   b. *Documenting the coordination and collaboration with other ministries in responding to the needs of students with disabilities at school and at home during remote learning.*
   c. *Identifying key decision points and changes in response activities.*
   d. *Surveying key stakeholders, including student voice about the effectiveness of key response activities.*

Once this is done, who makes the final decisions?

## EMERGENCY MANAGEMENT SYSTEM RECOMMENDATIONS

**Recommendations below are made in the context of the four phases of the emergency management process.**

*Stage One - Mitigation and Prevention*
*The mitigation and prevention stage include actions to eliminate or reduce hazards and their impacts should an emergency occur. It should be considered as an ongoing process, requiring monitoring and updating. This involves a hazard risk assessment is the process to identify hazardous events or situations with potential harm, the likelihood and severity of hazards to occur, and analysis of what could happen if a hazard occurs to identify weakness or vulnerabilities.*

We strongly suggest that monitoring be done in a way that is measurable and consistent across assessors, and which is subject to external quality assurance checks.

**Recommendations for risk assessment**

132. *School Boards perform a risk assessment to identify relevant potential hazards, risks, capabilities, and capacity for the delivery of education and health service supports for students with disabilities in an emergency event.*

*Timeline: 18 months*

Will the school boards' risk assessments involve stakeholders within each school board?

*Recommendations planning:*

138. *The Ministry of Education should direct its entire staff and all School Boards that whenever making information public in a Portable Document Format (PDF), it must at the same time, make available a textual format such as an accessible Microsoft Word (MSWord) or accessible HTML document. Videos must be audio described (DV) and closed captioned (CC). Templates and technical guides should be developed and provided to school boards.*

*Timeline: Immediate*

We recommend taking into consideration the time such measures will take and who will be responsible for ensuring that they are carried out.

144. *School Boards should ensure that its hub of learning resources specific to students with disabilities is accessible and available remotely to support teachers and students in their learning during an emergency.*

*Timeline: Immediate*

We recommend including a schedule for updates to the document.

145. *School Boards should assess and document accommodations, modifications, resources and supports for all students with disabilities to plan for continuation of learning in virtual environment in the event of an emergency or transition back to school after an emergency.*

*Timeline: Immediate*

Will school boards be provided with a template for the collection of this data?

146. *School Boards should independently collect board wide data on gaps, barriers, emerging issues, transition challenges, technology challenges, additional students' needs and supports as a result of an emergency event through assessment, student and parent feedback to address and plan for system wide supports and services required by students with disabilities to allow for continuous improvement of emergency response plans.*

*Timeline: One year*

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*Timeline Categories:*
- *Immediately from enactment of the Education Accessibility Standards regulation ("immediate")*
- *Six months from enactment ("six months")*
- *One year from enactment ("one year")*
- *18 months from enactment (18 months)*
- *Two years from enactment ("two years")*

At last we discover what is meant by the Timeline designations — 108 pages in.

It would be very helpful to readers to have this defined at the beginning of the document. See comment below "Overview of definitions." It might also be helpful to include, perhaps as an appendix or concluding each section, a table that lines up recommendations, timelines and who is responsible (Ministry, school board, school, transportation consortium, Faculty of Education).

The designation "Immediately" is a puzzling one. The definition given above means that some recommendations will pre-date regulation; i.e., they will arrive already late, which is a subtle discouragement when contemplating the likelihood of ALL the recommendations being put in place by 2025. In effect, once the document is enacted, the education system will have three years or less to implement recommendations that took three years to formulate. It is often said that it can take five years to implement a new program.

How realistic is it that 197 recommendations will be implemented in three years?

*Overview of regulatory and enforcement responsibilities under the Accessibility for Ontarians with Disabilities Act, 2005*

*Timeline Issues*
*Under the Accessibility for Ontarians with Disabilities Act, 2005 accessibility standards can set different timelines for different requirements. When it comes to a specific requirement, the accessibility standards can set different timelines for different categories of obligated organizations. Typically, this focuses on whether an obligated organization is in the public sector or private sector or if they are larger or smaller. In the case of school boards, all are treated as public sector.*

Historically, larger boards have had more of everything, allowing them to move forward more quickly. Smaller and remote boards, however, may have already met some of these recommendations out of need. We recommend the creation of a checklist that enables schools and boards to make a type of "pre-implementation assessment" of what is already in place. This can then guide what needs to be done. There is a danger in "all or none" thinking; we should be striving to use boards that already have X in place as models for implementation.

*To measure which obligated organizations are larger or smaller, earlier Accessibility for Ontarians with Disabilities Act, 2005 accessibility standards governing other areas have divided classes of obligated organizations by their number of employees. The K-12 Education Accessibility Standards Development Committee will aim to ensure accessibility for students with disabilities.*

*The numbers of employees at a school board, however, is not an appropriate way to divide up or classify the size of school boards. A more appropriate approach for purposes of the K-12 Education Accessibility Standards is to divide school boards into classes based on their numbers of students.*

Agreed.

***Role of the Ministry for Seniors and Accessibility***

*We here start from and build upon the enforcement provisions that are included in the Accessibility for Ontarians with Disabilities Act, 2005. The Accessibility for Ontarians with Disabilities Act, 2005 assigns responsibility for regulatory compliance and enforcement to the Accessibility Directorate of Ontario (ADO) at the Ministry for Seniors and Accessibility. As under any Accessibility for Ontarians with Disabilities Act, 2005 accessibility standards, the ministry is responsible for assisting obligated organizations by providing guides, training materials and templates to enable them to effectively understand what the accessibility standards require them to do.*

*…*

*The focus of compliance/enforcement activities should not simply be whether an obligated organization such as the Ontario Ministry of Education or a publicly funded school board has posted a policy on an action required by the K-12 Education Accessibility Standards. It is important to assess the end result such as, whether obligated organizations have in fact removed and prevented disability barriers that impede students with disabilities and to assess whether students with disabilities are being effectively included in and fully participating in the opportunities that Ontario's public education system provides to students.*

*End results must be formulated using observable and measurable language permitting to identify what needs to be done to ensure compliance.*

Who ensures that the Ministry responsible for enforcing compliance is doing so? Who watches the watchdog? The LARC Survey-Education Section recommends an oversight mechanism to address inconsistencies and disparities within schools and school boards.

Note that many organizations fail to comply with existing regulations under the AODA primarily due to there being a lack of resources allocated for compliance and enforcement. In addition, simple self-reporting checklists are not sufficient to attest to being compliance with regulatory requirements. A more robust compliance/enforcement framework must be developed to encourage compliance, otherwise there is little incentive for regulated entities to meet their requirements.

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*Overview of Definitions*

▲

See comment below.

*Definition of accountability measures:...*
*Definition of implementation: …*
*School boards: …*

**Timelines recommendations overview:**
*We think it is advisable to characterize the timelines for the implementation of Education Accessibility Standards Development Committee recommendations as follows:*

1.  *Immediately upon enactment of the regulation.*

2.  *One year after enactment of the regulation.*

3.  *Two years after enactment of the regulation and/or with a gradual roll out to sector, based on size and capacity of the school board but no later than January 1, 2025.*

*All affected parties should begin implementation planning to reach the targeted deadline for implementing the recommendations prior to the formal enactment of the Education Accessibility Standards Regulation. This should ensure compliance with the suggested timeline requirements.*

▲

In the document as laid out currently, the reader has to wait too long for a reference point for the cited Timelines. We recommend that this Overview of Definitions, or a version of it, be placed at the top of the document, ahead of the Barrier Narratives and Recommendations, and that it include an explicit reference to the Glossary for more definitions of terms used throughout the document.

## ACCOUNTABILITY AND COMPLIANCE RECOMMENDATIONS

*Implementation planning and outcomes measurement*

185. *We are proposing that each obligated organization develop a detailed implementation plan, with measurable performance metrics and timelines for achieving milestones towards the implementation of the Standards. The identified performance metrics should have process requirements such as establishing committees with impacted stakeholders (such as students with disabilities) to oversee the implementation planning as well as specific timelines for completion. It is important to assess the end result such as, whether obligated organizations have in fact removed and prevented disability barriers that impede students with disabilities and to assess whether students with disabilities are being effectively included in and fully participating in the opportunities that Ontario's education system provides to students (see model implementation planning template).*

Having 72 school boards + authorities develop their own plan can lead to 72+ different interpretations. Allow each individual obligated organization (board) to develop its own plan only if the Ministry provides a matrix of expected end results.

**Public reporting: school boards, college of teachers and government**

186. *In terms of reporting, each obligated organization should be directed by the Accessibility Directorate (Ministry for Seniors and Accessibility) to have a section on their web site that publicly reports on the implementation of the Standards. This could be in the form of an annual report, or a completion matrix of the organizations progress to date.*

187. *In addition, the Accessibility Directorate of Ontario (Ministry for Seniors and Accessibility) should be required to promptly make public a detailed, comprehensive annual and multi-year compliance/enforcement plan for the K-12 Education Accessibility Standards. It should publicly report quarterly on actions taken and actual accessibility improvements achieved.*

Some boards already include information on accessibility (buildings) in their annual Special Education report. However, these are often couched in flowery language which can make things seem better than they are.

A Ministry-produced matrix would make things much clearer.

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189. *As part of the government's compliance/ enforcement plan, it should establish and widely publicize a provincial toll-free number, and dedicated email address to receive complaints and concerns from students with disabilities their families or others regarding accessible education for students with disabilities. Those contacting this number should be advised to take up their concern first with the relevant obligated organization through its process for addressing such concerns, before bringing it to the Accessibility Directorate of Ontario (Ministry for Seniors and Accessibility). The ministry should assign a rapid response team to take action where appropriate on input received from this phone number or email address. A summary of input/complaints received (with no identifying information) should be made public quarterly.*

Who decides when action is "appropriate"? What will be included in the summary of input/complaints? We recommend that it include whether or not the complaint was resolved: e.g., the percentage of complaints that were resolved to the satisfaction of all parties.

190. *Those appointed with Accessibility for Ontarians with Disabilities Act, 2005 compliance/ enforcement powers who will be addressing the implementation of the K-12 Education Accessibility Standards should have knowledge and any building permit process for a new school or major renovation should be required to comply with the built environment provisions of the K-12 Education Accessibility Standards in order to get a building permit. The project should be checked for compliance with the Accessibility for Ontarians with Disabilities Act, 2005 and not just the Ontario Building Code in that process. In addition, the Accessibility Directorate (Ministry for Seniors and Accessibility) should have staff with experience in the area of education of students with disabilities or should have a resource team whom they can regularly and readily consult who have that expertise. To avoid conflicts of interest, the members of that resource team should be independent of any organizations that have obligations under the K-12 Education Accessibility Standards.*

We commend the inclusion of input from someone with lived experience in the education of students with disabilities and who is familiar with the "accessibility lens." Such inclusion makes it more likely that buildings meet the needs of students with both visible and invisible disabilities.

*Internal: School boards*

*Reporting to the government: school boards, college of teachers, transportation consortia*

### Role of the Ministry of Education

194.    *In addition, although the Accessibility Directorate (Ministry for Seniors and Accessibility) has regulatory authority over its obligated organizations, we believe Boards should be also be required to report to the Ministry of Education (and the Accessibility Directorate) each quarter on the results of their implementation actions and performance. Reports should detail successes and challenges in meeting the requirements of the Education Accessibility Standards recommendation with proposed solutions or remediation efforts. The College of Teachers should have the same reporting requirements.*

If reporting is to be done every quarter, then process must be easy to engage in, with a minimum of "paperwork." Perhaps a matrix with an "update" column?

### Ensuring compliance obligations: audits and reviews

*As noted above, recent reports have documented how little oversight and enforcement currently exists with respect to various accessibility standards under the Accessibility for Ontarians with Disabilities Act, 2005. …*

195.    *The Accessibility Directorate (Ministry for Seniors and Accessibility) conduct on-site inspections of a range of obligated organizations each year on the actual accessibility of their facilities and educational programs and services as addressed in the Standards, and not just an audit of their paper records on accessibility documentation.*

*The Accessibility Directorate (Ministry for Seniors and Accessibility) conduct "implementation reviews" of a select number of school boards and the College of Teachers within six months of the government's enactment of the Education Standards regulation. The purpose of these reviews is to ensure boards and the College have developed an implementation plan with performance metrics and designated responsibility centres and have started to move forward with the implementation of the Standards.*

How wonderful it would be to see this completed!

We foresee that inspections of facilities will be much easier to carry out than "educational programs and services" will be, however. It may be best accomplished by a survey of staff, students and/or their parents/ guardians and other stakeholders, commenting on what, to their observation, is or is not actually in place.

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*Glossary of Terms and Definitions...*

It would be helpful to add to glossary:

- Differentiated instruction
- Evidence-informed
- In-serviced
- Low-incidence disabilities
- Person-centred
- QUIAT
- SETT
- Undue hardship
- Universal Design for Learning