



Ontario Catholic School
Trustees' Association



ONTARIO PUBLIC
SCHOOL BOARDS'
ASSOCIATION

Leading Education's Advocates

SCHOOL BOARD SECTOR INPUT TO INDEPENDENT REVIEW OF THE ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT

School Boards in Ontario are responsible for the education of more than 2 million students in the province's elementary and secondary schools. Boards are represented by the following organizations:

Ontario Public School Boards' Association
Ontario Catholic School Trustees' Association
Association des conseils scolaires des écoles publiques de l'Ontario
Association franco-ontarienne des conseils scolaires catholiques

We are pleased to have the opportunity to provide input into the second three-year review of the *Accessibility for Ontarians with Disabilities Act, 2005*. In 2009 we contributed to the first review of the *Act* conducted by Dr. Charles Beer and were encouraged to see that our input with regard to the need to harmonize accessibility standards was welcomed.

Our current response is based on feedback we have sought from school board staff who are responsible for accessibility initiatives at their boards. They have reflected on the opportunities and challenges with implementation of Accessibility Standards and their comments and advice with respect to specific aspects of regulations made pursuant to the AODA are presented here. There are also some themes that are common across all aspects of the work the school board sector is doing to implement the provisions of the legislation.

Common Themes

It is clear that school boards are committed to building an accessible environment and over the past several years have undertaken work to incorporate not just compliance with legislation but also the spirit of accessibility in schools and workplaces.

With regard to implementing the requirements of accessibility standards, the most commonly identified issue calls for greater clarity in the regulations and greater specificity that would guide organizations towards fully meeting the expectations of the legislation. We feel that interpretation of proactive standards should not entail having to seek legal counsel.

Another common issue is that of funding. School boards are funded entirely by the Ministry of Education and rely on the Ministry to build into the education funding formula

planned resources to enable the ongoing improvements required by the accessibility standards. Despite the lack of dedicated funding for accessibility, for many years now school board planning has included improvements that will increase accessibility in the environment. School boards recognize that working as quickly as possible towards full accessibility is the right thing to do. However, responding to the range of accessibility requirements set out in legislation on a more intensive schedule does create funding pressures particularly in training, technology upgrades to meet accessible information and communication needs, and improvements in the built environment. We acknowledge that on the matter of built environment a March 27, 2014 education funding announcement makes some provision for improving the conditions of schools from an accessibility perspective.

Given the goal of creating an accessible environment in Ontario, with public sector organizations leading the way, we have advocated, and continue to advocate, for a high degree of coordination and collaboration across government ministries so that there is clear evidence that all branches of the government are “walking the talk”. This would help the various public sectors to prioritize, plan and allocate resources to help meet overall government goals.

Specific Issues

Multi-year Accessibility Plan

The introduction of a multi-year accessibility plan to replace the annual plan under the *Ontarians with Disabilities Act, 2001* is viewed as presenting better opportunities for longer-range thinking and building sustained awareness of and shared commitment to addressing accessibility needs. This approach is having a positive impact on inclusive environments and educational opportunities.

To eliminate any outstanding confusion, we would like to see confirmation that the previous requirement for annual accessibility plans under the *Ontarians with Disabilities Act, 2001* is no longer in effect. Greater clarity on the requirements in the Integrated Accessibility Standards Regulation would assist with developing more effective multi-year plans. The issues previously noted in terms of funding constraints are a barrier to more ambitious accessibility planning. Attracting and retaining community members for school board accessibility advisory committees is a challenge; support and advice on addressing this challenge would be welcome.

Training Requirements

There have been significant efforts within the school board sector to develop common training resources. This has been possible in large part to the support available from the Accessibility Directorate’s *EnAbling Change* program. Beyond the content of training resources, our provincial organization has helped school boards connect with each other and share effective approaches.

The accessible employment standards have requirements that are very much aligned with human resources practices in school boards. However, at the recruitment point of

the employment cycle, there is scope for training that offers a deeper understanding of practical considerations that would broaden the job opportunities for individuals with disabilities.

The greatest challenge for school boards is the sheer volume of personnel who must receive training under the regulations and the fact that a majority of our staff are in classrooms. If staff are released from classrooms to participate in training, they have to be replaced and this is a costly measure. Training can be done on Professional Development Days when there are no children in the classrooms but there are very few of these days. The range of other training, much of it mandatory, that has to be managed on those days means that it is often not possible to allocate time in the PD day schedule to offer training in accessibility requirements. The main alternative is a self-directed learning approach which our school boards have been offering and this also has its challenges including establishing paid time within the working day for this to be accomplished.

The Integrated Accessibility Standards Regulation (IASR) requires that volunteers be trained. Every school in the province has a cadre of volunteers and school boards can have anywhere from 17 to close to 500 schools in their jurisdiction. This adds up to a large number of volunteers with a greater turnover rate than would be typical for staff. It would be helpful if the regulation had a more flexible provision when it comes to volunteers, including with regard to tracking training.

The requirement to keep records of training also brings its challenges. Some school boards have learning management systems which automatically track participation in training. Many do not and find the process onerous. It would be helpful to consider supports or mechanisms that would assist organizations with this process. This is possibly an issue that affects many sectors.

It was noted that there is a need for clarification around who should be trained and what should be included in the training they have. Currently there is customer service training, general IASR training and educator training.

Information and Communication

School Boards have implemented a range of measures so as to meet the requirement to provide information in accessible formats. This includes ensuring that when documents are originally created they are done so in accessible formats. Offering accessible formats in a timely fashion can be a challenge depending on the format, for example, it was noted by one of our schools that recent changes in Unified Braille Code has meant that *“all our current Brailleists and Teachers are in the process of either recertifying in the new Code and/or updating their knowledge of the new Code in order to provide accessible texts and appropriate instruction in Braille literacy and numeracy.”* This is raised to underscore that there can be factors outside one’s control in meeting regulatory requirements.

Similarly, a frequent comment in the area of communications supports was the challenge of having access to specialized services, both from availability and cost perspectives. These include sign language interpreting, computerized note-taking, and closed captioning services.

Ensuring fully accessible websites in the decentralized environment of school boards was also raised. While central school board websites are compliant with requirements, there is a concern about ensuring compliance across the hundreds of websites in individual schools including those set up for classrooms by teachers. The issues in addressing this involve both costs and availability of technical support staff.

School Libraries

By January, 2015, school libraries must provide or acquire accessible or conversion-ready format of print resources for a person with a disability on request. Many school boards are currently developing plans to meet this requirement, including through changes to procurement processes as well as processes to acquire accessible formats through central repositories such as AERO (Alternative Education Resources for Ontario). Budgetary considerations are frequently cited as a challenge in acquiring alternative formats as are licencing restrictions in access to e-books. Also cited is the issue of sourcing materials in accessible formats from the publishing industry which (outside of education publishers) are not required to offer alternative versions.

Conclusion

The information we gathered from school board personnel with key responsibility for accessibility indicates the *Accessibility for Ontarians with Disabilities Act, 2005* is having a significant and positive impact in Ontario school boards. The commitment to achieving change as contemplated by the requirements of the accessibility standards is evident in the planning and processes that are in place and are being continually built upon. They are constrained by access to resources to implement desired changes.

In this regard, as noted earlier, collaboration among ministries to align, support and fund priorities across sectors would help to accelerate progress towards a fully accessible Ontario. Support for sector-specific networks to share effective practices and resources would also be helpful.

In terms of future standards development, for example in the education sector, it would be effective to engage representatives of education organizations at all levels and representatives of organizations serving people with disabilities so that they could share their respective views on the issues to be addressed in moving towards full accessibility. Such a dialogue would promote a more profound understanding of the barriers to be overcome and the practicable measures that would serve to overcome them.

We appreciate the opportunity to contribute to the second Independent Review of the *Accessibility for Ontarians with Disabilities Act, 2005* and look forward to seeing the report later this year.

May 21, 2014