CNIB Response to the Accessibility for Ontarians with Disabilities Act (AODA) K-12 Education Standards – Initial Recommendations

September 2021



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## Introduction

In June 2021, the Ontario Government posted a [set of proposed K-12 education standards](https://www.ontario.ca/page/consultation-initial-recommendations-development-proposed-kindergarten-grade-12-k-12-education) under the Accessibility for Ontarians with Disabilities Act (AODA) for public feedback. These standards aim to identify, remove, and prevent accessibility gaps and barriers faced by students with disabilities from kindergarten to grade 12 (K-12). The recommendations are also designed to ensure a successful transition for students with disabilities from secondary school to post-secondary programs and/or the workplace.

Through our own community consultations on education, including [our original response to the AODA Education Standard in 2017](https://cnib.ca/sites/default/files/2021-08/AODA%20Education%20Standard%20Report%202017_0.docx) and our [response to the government’s For the Parents Consultation in 2018](https://cnib.ca/en/news/cnib-responds-parents-consultation?region=on), we highlighted the necessity of reforming the Ontario school system to ensure safe, accessible, and effective learning experiences for students in Ontario who are blind or partially sighted.

During Summer 2021, CNIB consulted members of its community on the proposed AODA K-12 education standards, including the transition standards. Interviewees included Ontario K-12 teachers and CNIB staff, as well as students who are blind or partially sighted and their parents.

We commend the Government of Ontario for taking the initiative to form accessibility standards for the K-12 education sector, including the precarious transition from K-12 to post-secondary, the workplace, and the wider community. While these recommendations are comprehensive, there are certain gaps and limitations that CNIB would like the committee to consider.

This document highlights general recommendations that apply to multiple sections of the Ontario Government’s proposed standards. We also identify recommendations specific to Sections 1 through 9 as listed in the committee’s report, before moving on to the recommendations for the standards on transitions.

## General Recommendations

### **Lack of specific and centralized oversight**

We feel the recommendations are often too vague, leaving processes of implementing, monitoring, and enforcing change up to the interpretation of individual school boards. Without more guidance from the Ministry of Seniors & Accessibility and the Ministry of Education, patchworked policy, inefficient resource allocation, and inconsistency across school boards threatens to exacerbate existing inequities across the province’s school boards.

**We recommend that the standards ensure the application of practical and effective channels to implement, monitor, and enforce the recommendations. Moreover, CNIB recommends that standards involving implementation, monitoring and/or enforcing change be more specific on the roles that will be taken by each of the stakeholders. Roles of this nature should be clearly defined to avoid confusion and ensure standards are being executed appropriately.**

Examples:

* Section 1: 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. **(Specifically, who is accountable for these groups? How will they be established and maintained? What is the vision for their accountability and engagement?)**
* Section 3: 9.1. the Ministry of Education and Boards incorporate Universal Design for Learning in the requirements for curriculum design. **(Specifically, how will this be measured and evaluated?)**
* Section 3: 9.2. the Ministry process for review and renewal of curriculum use principles of accessibility, equity and inclusion in design and development, ensuring full accessibility of curriculum for students with disabilities. **(Specifically, how will this be measured and evaluated?)**
* Section 3: 9.8. the Ministry develop and communicate guidelines that support school boards and staff with action plans and strategies for ongoing local curriculum reviews. These reviews require Boards communicate results of curriculum review, renewal and new curriculum plans ensuring equitable barrier-free accessibility for students with disabilities. **(Who are these guidelines being communicated to? On what criteria is the curriculum being reviewed? Do these channels of communication exist currently or do they need to be established?)**

### **Teacher Training**

Though CNIB interviewees echoed that teachers need to be better trained to teach students with disabilities, the emphasis on teachers neglects opportunities for re-training and utilizing one-on-one student supports and top-down powers within the Ontario education system.

* 1. **One-on-One Supports**: Education Assistants, Teachers of the Visually Impaired (TVIs), class assistants, and other educational supports were not prioritized as part of the solution to create a complete learning experience for students with disabilities. They were not mentioned as members to include in emergency planning nor as part of teams assessing risk to the student body.
  2. **Top-Bottom Powers**: Relevant Ministries, Ontario School Boards, and Teachers’ Colleges were not targeted as units in need of reform. Those in long-standing positions of power with limited connection to the classroom and its operation should receive equal attention when planning retraining programs and interventions. Issues of inclusion, diversity, equity, and accessibility are systemic, and all parties are responsible for understanding how to recognize and address these existing problems within the Ontario education system.
  3. **Other academic supports**: Guidance counsellors were identified as having room for improvement and re-training. One interviewee identified how biases limit opportunities and damage the sense of self of those with disabilities:

**“...So, they may say ‘Oh, why you going into a pre-law program? Oh, I think this will be better for you’ and steer them to something else that may not be their desire or their interest because they're saying, ‘Somebody who's legally blind can't be a lawyer’, but in their minds, they don't see that happening because they've never seen that in real life, so they don't think it's possible.”**

**We recommend that training and re-training opportunities are directed throughout all facets of the education system to ensure change is systemically established and regulated.**

### Training Programs

The small number of training programs proposed within the recommendations was concerning. Moreover, there is no mention of what specific topics will be covered, who oversees creating program plans, and when they will take place in an educator's career. There is also no mention of whether retraining will take place on an ongoing basis, annually or otherwise.

Many CNIB interviewees mentioned the potential of shifting the training of teachers from Additional Qualifications (AQs) to the teachers’ college level. As referenced in 53.5, we support the need for a higher standard of education for Teachers of the Visually Impaired (TVIs) to prepare them for working with students with sight loss and believe an undergraduate or master’s degree is the way forward. To this end, CNIB has been involved with ongoing conversations with the Ministry of Education on improving the standards. As the Ontario College of Teachers (OCT) continues their work in this area, we strongly recommend consulting with Educational Institutions in North America currently providing curricula and setting standards of educational excellence for students who are blind and partially sighted.

Examples:

* Section 1: 2.1. the Ontario College of Teachers and the Ministry of Education require that, to graduate with a degree in education and to qualify to teach in an Ontario school, teachers receive specific curriculum and training, as part of their university program in education, on the need for our education system to be inclusive and accessible for students with disabilities, and on how to teach curriculum to all students on this topic. **(Specifically, the type of training that teachers-in-training should receive is vague – technically, a one-hour module could meet the requirements as laid out, yet this would be insufficient for any meaningful or practical change in teacher education.)**

**Our recommendation is to create a schedule or “curriculum” of high-quality training programs to actively address all the training objectives highlighted in the recommendations. We also support the enhancement of TVI training from Additional Qualifications to a university degree, as proposed in recommendation 53.5. Furthermore, we also support the proposal in recommendation 51.6 to collect data on the numbers of qualified TVIs, and request that the level of expertise is also tracked as part of this data (i.e., what level of AQ has been attained). The numbers of educational supports that are not qualified TVIs but are acting in that capacity in lieu of a qualified TVI in that school board should also be tracked to identify areas where students with sight loss are being underserved.**

### Scope of application

It is unclear if these recommendations apply only to publicly funded schools or if private schools, before and after school programs, and lunch and recess programs will also have these standards applied.

**We recommend that the Ontario Government specify where these standards will be applied. We also recommend applying these standards to all environments involved with the K-12 education sector, including daycare centres, before and after school programs, private schools, lunch and recess programs.**

## Section Specific Recommendations

## Section 1: Attitudes, behaviours, perceptions, and assumptions

When conversing about this topic with the CNIB community, it was clear that some assumptions fostered within the education system do more to limit a child’s learning experience than others. For example, participants identified that the education system does not consider the variation involved in disability, often equating sight loss to mean seeing nothing, or even attaching their diagnosis to intellectual disabilities. These assumptions have negative consequences for the strategies of education and students’ treatment within the school system.

**“Educators, teachers, instructors would make assumptions in terms of what students can do. I think that happens, right from the minute they enter kindergarten, that there's a lot of bias in terms of understanding of what a vision impairment is and what that means for an individual, and it's always looked upon as a deficit, ‘poor them’.”**

Community members also highlighted the assumption made within the education system that Education Assistants (EAs) and other one-on-one supports know how to best integrate students with disabilities within the classroom. Interviewees identified that parents and guardians should be consulted and involved in the decision-making process, as they have the most experience managing the unique needs associated with their child.

**We recommend prioritizing training educators on the scope of disabilities and ensuring that teachers are introduced to these topics within teachers’ college, as opposed to being introduced to them through elective training.**

## Section 2: Awareness and training

### Training for Education Assistants

One-on-one supports were neglected from the discussion on training. For example, one interviewee explained her experience with EAs that were uninformed of her child’s needs.

**“Specific EAs for vision students [should be] put into place, rather than just rotate someone that's already on staff. They might be a great EA but if they have no experience with a child who uses braille, that's not going to work and having a vision itinerant that comes in, once a week or once a month isn’t enough.”**

**It is recommended that EAs and other supports receive specific and comprehensive training focused on the disability of their assigned child.**

### Early notification and planning

Teachers need the support of the entire education system to manage the learning plan of their students with disabilities. Interviewees with teaching experience noted that they were not told ahead of time if their students had disabilities or what individual needs their students required of them. As one participant stated, teachers had limited capacity to comply with Individual Education Plans (IEPs):

**“We have encountered so many times that teachers and administration have not been following IEP and the recommendations in IEP, not because they don't want to, but because they don't know how, and this is where teaching and training comes into play.”**

**“It makes all the difference in the world, before the first day of school. Before chaos on day one, because it's not fair to the visually impaired child to try to find their desk with their name on it. The teacher has enough to do on that first day as they prep for their class, they need to have that information on hand to make sure that that visually impaired child is included from the first day of school. That was our biggest challenge.”**

**We recommend that teachers are given advance notice of the nature of the disability of their students to prepare a sufficient learning plan for their child.**

**Measures to proactively protect students who are not in the system should also be established as best practice. It is also recommended that teachers meet with the parents of their students ahead of time so that they have an additional person to communicate with who understands the specific needs of their student. In the case of sight loss, we also recommend establishing a mandate that teachers and boards must select their textbooks in advance to ensure transcription to an accessible format can be done in time for the beginning of the school semester.**

## Section 3: Curriculum assessment and instruction

### Integrate disability in teaching degrees

Teachers should be introduced to topics of accessibility, disability, and inclusion prior to Additional Qualifications.

**“As someone who teaches in the Faculty of Education, I teach teachers. If you talk to any university that has a Bachelor of Education program, they'll tell you that it’s being done, but as someone who actually works and teaches in that system, that isn't being done, because the teachers, and the instructors, and the professors who are teaching that have absolutely no expertise or experience with people with vision impairments or other impairments, to be honest with you. So, they can't teach what they don't know, on paper they will say that it's being done, but in actuality, it isn't being done.”**

**To ensure teachers have the capacity to help support students with disabilities, they should be introduced to teaching methods and case-analysis of learning plans for students with disabilities prior to joining boards. Teachers in higher positions of power should also be retrained on this topic.**

CNIB and Vision Loss Rehabilitation Ontario provide peripheral supports to students with sight loss and our main focus is to empower students with sight loss and their families through community-based programs, rehabilitation, and advocacy. We endorse the full implementation of all compensatory skills highlighted in the Expanded Core Curriculum (Recommendation 27.2). **We also recommend the formal adoption of the** [**Canadian National Standards for the Education of Children and Youth Who are Blind or Visually Impaired, Including Those with Additional Disabilities**](https://apsea.ca/assets/files/bvi/canadian-national-standards-doc.pdf) **across all Ontario school boards.**

## Section 4: Digital learning and technology

### Advance creation of accessible materials

No mention was made of advance preparation regarding curriculum resources and materials. This process allows the student to start their academic year successfully and is especially important as reading materials may take longer to prepare for students with certain disabilities, such as sight loss.

**Curriculum materials should be gathered and made accessible prior to a student entering the school year.**

### Individual Learning Styles

The recommendations do not devote much attention to the individual learning styles of students with disabilities. For example, one student that was interviewed recalled how she needed a reader but was only given access to what the school’s standard was for students with sight loss, which did not suit her learning style.

**Attention should be given to the students' learning styles and needs as opposed to giving them a one-size-fits-all solution based on what the school has historically given students with that particular disability.**

### Virtual Learning Standards

It is important to highlight parents’ concerns regarding how the learning platform used during virtual learning (COVID-19) was not accessible.

**It would be beneficial to set an accessibility standard for virtual learning and have it reviewed each year. This should be prioritized in future drafts of recommendations.**

## Section 5: Organizational Barriers

### Strengthening IEPs

Our community feels that IEPs are not being treated as legal documents and are not being planned with the perspective of parents of students with disabilities, and teachers are not given enough support from the education system to be able to comply with IEPs. Additionally, there has been little attempt to expand IEPs in the recommendations to better support students with disabilities. Currently, the recommendations have not specifically identified IEPs as a tool that can be utilized to achieve the government’s goals.

Example:

* Section 5: 40.3. Ensure that school boards fulfil their duty to accommodate the disability-related needs of students with disabilities, in relation to all school-related activities, and that the policies are in place to ensure that they do so. **(There is no mention of IEPs, nor a clear definition of what ‘school-related activities’ include.)**

**We recommend that IEPs include before and after school programs, recess, and lunch programs. Strategies for success should also be prepared for each student ahead of time for less structured learning environments, such as gym classes, as well as spaces for learning beyond the school setting, including field trips. All facets of a student’s learning journey are opportunities for the education system to work together to prepare them for success.**

### Evaluation Process for IEPs

There should be a system implemented to monitor the successes, gaps, and issues that arise with IEPs and with all other strategies for success. Monitoring IEPs should be a shared responsibility, incorporating many advocates for the student. This should include the student, themselves, their parents or guardians, one-on-one supports, teachers, their respective board, and the Ministry of Education.

**We recommend evaluation processes, IEP reviews and learning experiences be made available to students and parents/guardians on an ongoing basis, with the support of teachers and learning staff. Boards should have a process of knowledge sharing to identify and work on their limitations and shortcomings when reviewing the delivery of IEPs. Finally, the Ministry of Education should implement a process to ensure that all gaps and issues arising with the delivery of IEPs are addressed in a timely manner, not further threatening the student’s academic success.**

### Strengthen Parent and School Board Communication

Parents of students with sight loss described incidents of having to advocate for their child’s well-being and safety independently within the school setting. Alternatively, parents without the means or knowledge of how to advocate within their child’s school described feeling badly about their limited capacity and knowledge of operations and hierarchies. Parents should not have to independently fight for their child’s learning experience. This process creates inequities among students based on whether their parents have the means and time to problem-solve.

**“Not having the processes in place of knowing how to navigate spaces outside of the school with someone who has a vision impairment or who's blind needs to be considered as well. I know my daughter had this issue where she would just stay in one part of the field because she was afraid to explore anywhere else, because you weren't sure who was a kid, who was a teacher. Let's say intermediate students might be the same height, if not taller, than the teachers. How will someone who has a vision impairment know who's the safe person to go to if they're in trouble? I had to fight the school, ‘you need to have your teachers wearing a vest’. [I] went out at recess, well they don't really want to, and they find it hot. I don't really care how they're feeling, to me that's part of the emergency and safety aspects, and so my family, my husband and I, purchased the vests for all of the teachers in that school in order to make it happen, I said, I have now invested into the school.”**

**We recommend the process of problem-solving be made easier by establishing methods of communication between parents and school boards, as well as between parents and relevant ministries. If those discussions are unsuccessful, we fully support recommendation 42.2 for parents and students to contact an Ombudsman to help resolve their concern. This will mean that they are not compelled to file a Human Rights Complaint as their only recourse, or fear reprisals within the school board if they push the issue internally. In response to 49.12, we also recommend that it is made explicit that the requirements to give a final decision in writing do not exclude accessible electronic versions of that document which can be sent via email.**

## Section 6: Social realms

### Experiential / co-op learning opportunities

As raised in CNIB’s response to the Ontario Government’s "For the Parents" consultation, without a well-funded process to support employers in providing accommodations to co-op placements and other short-term work experience opportunities means students cannot find an employer that is willing to take them on, or they end up taking opportunities at organizations that aren’t in line with their employment goals but are willing to accommodate. CNIB has experienced this firsthand when we are contacted by bright and engaged students with sight loss who are unable to find a placement because their employers of choice are unwilling or unable to make simple accommodations.

As the committee’s report mentions, when people with disabilities are unable to gain work experience as an adolescent, it sets them at a disadvantage in the workforce from a very young age. **In addition to providing supports and advice, we recommend that the provincial government sets up a fund that students with disabilities can access for co-op and placement accommodations**, to help ease any financial concerns that employers have around providing accommodations for a short-term employee.

### Oversight of bus driver training

This section highlights a great deal about the training of bus drivers and holding these companies accountable for their accessibility services. However, there is no description of which stakeholder will be responsible for this accountability. Further, there is no mention of a consistent level that will be set by the Ministry for the appropriate training of the drivers. In order to have these standards met, these gaps need to be addressed.

**We recommend that the designated stakeholder responsible for accountability is clearly stated under each of the necessary standards. This information should be clear so no assumptions of roles can be made. We also recommend that the Ministry set a level for training that will be consistent across all school boards.**

### Strategies to mitigate isolation

While recommendation 67 is an effective way to target social isolation, we would like to provide additional insights based on feedback from the CNIB community. Interviewees suggested the idea of structured socialization at recess to ensure comfort and safety among students with a disability. This will promote inclusion and socialization among all students. For example, the school could have structured games that are organized and run by school staff that takes place over the lunch breaks or recess.

**We recommend adding an additional recommendation that promotes socialization among students.** This new recommendation will create another option for student socialization and increase the level of comfort provided to these students.

## Section 8: Planning for emergencies and safety framework

### Emergency Preparedness

Within this section, a clear definition is not given for what constitutes an “emergency”. When consulting with the community, they mentioned emergencies as small as fire drills; however, the recommendations tend to focus on large-scale emergencies, such as the COVID-19 pandemic. Parents also highlighted emergency planning for emergencies that happen outside of the school building. One parent expressed the importance of this with an example,

​​” ...emergency preparedness when they're not in the school building, my child had an experience on a field trip [of] being left behind on the field trip.”

This example illustrates the need for emergency planning for students. The absence of a clear definition also leaves the scope of responsibility open for interpretation. That is, does responsibility for emergency planning fall to national, provincial, community or school board organizations?

**Our recommendation is to give a clear definition of what constitutes an emergency, including details about different levels of focus (e.g., a large-scale emergency like COVID-19, versus a local emergency like a fire drill).** When defining an emergency, it is important to remember that emergencies are dynamic in nature and incorporate this into the definition.

**We advise that the proposed recommendations be broken down further to cover different levels of emergency.** For example, Recommendation 121 discusses an Emergency Plan Guideline for the currently ill-defined term “emergency” and will need to be altered once levels of emergency are clearly defined.

### Individual Emergency Plans

When it comes to emergency planning, community members expressed the need for students with a disability to have individual emergency plans which they are directly involved in creating. Students should be involved in emergency planning to ensure they feel safe and prepared for learning. Interviewees recommended that an emergency plan should be included in a student's IEP to ensure the plan is being followed as intended.

We recommend that this student-led emergency planning be incorporated into the recommendations.

## Transition Recommendations

### Guidance and Career Counsellor Training

CNIB community members expressed the transition to post-secondary school is not currently supported by the high school system. One parent expressed that if it wasn’t for their child's vision itinerant teacher, they would not have known the process for registering with the post-secondary school’s accessibility office. Parents also expressed that they had a better experience with universities because of their increased focus and capacity to meet the needs of students with disabilities. This support, however, was severely lacking in the transition phase. Unfortunately, without established transitional supports within high schools, not all students with a disability have access to the same level of support.

**Therefore, we recommend that the recommendations include the need to ensure that high school guidance and career counsellors have adequate knowledge on post-secondary student accessibility offices and how to access them. To do this, we recommend workshops should be put in place by the Ministry of Education and the Ministry of Colleges and Universities that will provide up-to-date information for staff in this position.** In doing this, students with disabilities will have a more successful transition to post-secondary.

Additionally, interviewees communicated the need for this information to be accessible by parents. They expressed that this information is often only available through the students’ class websites, which parents do not have direct access to. This puts the full responsibility on the student to know what needs to be done for the transition from K-12 to post-secondary, and parents unable to fully support them.

**Our recommendation is to require guidance and career counsellors to regularly update their school’s website with the information on accessing supports in post-secondary (e.g. registering with the student accessibility office), that they will learn from the previously recommended workshops.** This will facilitate a smoother transition for students with disabilities, as their parents and guardians will have access to the same information the student has and will be able to offer greater support during their child’s transition.

### Consistency of required documentation

Recommendation 42 gives details on the documentation requirements that will aid in a smooth transition from K-12 to post-secondary. However, it is stated that these only need to be “reasonably consistent” across the sector. This creates a gap in the system where documentation can vary from one institution to another. When changing institutions, e.g., transferring schools, going from college to university, or entering post-graduate studies, issues may arise because of the inconsistency between schools.

**We, therefore, recommend that these required documents must be consistent across all universities and colleges to smooth the transition for students and allow them to obtain these documents more easily.**

### Experiential learning

A common topic of discussion among interviewees was the lack of opportunities for co-operative education programs for students with disabilities. Recommendation 64 addresses this issue with the excellent suggestion of expanding experiential learning opportunities and offering new ones for these students. However, there is no mention of how to implement these opportunities, nor even mention of what the new opportunities would be.

**Our recommendation is to clearly detail the plan for implementing new experiential learning opportunities and provide examples of what those programs will look like.**

# Conclusion

We commend the K-12 Education Standards Development Committee for producing this comprehensive and detailed report, which reflects the considerable gaps and barriers in the education sector in Ontario for students with disabilities. Overall, we are supportive of the AODA K-12 Education Standards that have been proposed, with a few amendments and points for consideration as outlined above. We hope the committee will find our feedback useful in finalizing the Standards and look forward to continuing to collaborate across the sector to ensure that disability will never be a barrier to a student’s success in education.

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