# CNIB Response to the Accessibility for Ontarians with Disabilities Act (AODA) Post-Secondary Education Standards – Initial Recommendations

# October 2021



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## Introduction

In June 2021, the Ontario Government posted a set of [proposed post-secondary education (PSE) standards](https://www.ontario.ca/page/consultation-initial-recommendations-development-proposed-postsecondary-education-accessibility) under the Accessibility for Ontarians with Disabilities Act (AODA) for public feedback. The goal of these standards is to ensure all students with disabilities have an opportunity to participate fully in all aspects of post-secondary education without barriers. More specifically, these standards represent a call to action to improve post-secondary recruitment, retention, graduation, and employment rates for students with disabilities.

We commend the Government of Ontario for taking the initiative to develop comprehensive accessibility standards for post-secondary education. Notably, the standards are specific and cover a variety of important aspects of accessibility in post-secondary education. CNIB’s intent is to provide feedback to the Post-secondary Standards Development Committee in areas where standards lack clarity, and/or contain gaps, or where CNIB supports the standards as stated. CNIB’s feedback is informed through research and consultations with persons living with sight loss in Canada.

Throughout 2020 and 2021, CNIB completed research within the context of living with sight loss. The research included a survey on the accessibility of digital learning in 2021, a post-secondary outcomes study for persons living with sight loss in 2020-2021, and a COVID-19 survey that included questions around accessibility to education during the pandemic. Along with our comments on the proposed standards, the findings from each of these pieces of research are included in this document.

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.

## Outcomes from CNIB Research Consultations on Post-Secondary Education 2020-2021

### Background

While the Post-secondary Standards Development Committee has been engaged in its work, CNIB also undertook several relevant research and consultation projects. Immediately prior to the COVID-19 pandemic, we assessed the current landscape of post-secondary education experiences and outcomes for post-secondary students and recent graduates with sight loss. In the early months of the pandemic, we followed this up with an examination of the barriers faced by students that were associated with COVID-19. Finally, we followed up with a study to understand the online learning experiences of post-secondary students one year into the pandemic. Together, these projects yielded findings about the evolution of the post-secondary student experience for students with sight loss over the past two academic years.

## Post-secondary Education Outcomes (2020)

### Diversity of Post-secondary Experience

Although classroom learning was part of the learning experience of 79% of survey respondents, only 9% of respondents indicated that they had only one type of learning environment – greater than 90% of respondents had experience of at least two learning environments in post-secondary education.

* Online learning (49%) and research (46%) were the next most commonly experienced learning environments.
* Lab work (27%) and field work (26%) were included in the learning experiences of a significant minority of students.
* Work-integrated learning opportunities are of growing importance for students with sight loss in post-secondary education; these include co-op placements (22%), internships (16%) and clinical placements (8%).

Our research demonstrates students with sight loss are participating in an increasing number and diversity of learning environments in post-secondary education. Recommendations and Standards that address accessibility in the context of the diversity of the post-secondary learning environment would be appropriate, and reflective of the evolution of the student experience.

### Use of Disability Services Offices (DSO)

* Most students were likely to use their DSO. Students were most likely to use their DSO at least once per semester (69%).
* A majority (60%) of students using their disability services offices felt that the frequency of DSO visits was sufficient for their needs.
* A majority (67%) of students using their disability services offices were either very satisfied or mostly satisfied with the assistance provided by their DSO.
* DSO staff were perceived to be more successful than not (69%), when tasked to communicate accommodation needs to students’ professors.

### Access to Academic Materials in Accessible Formats

A majority (72%) of students who requested accessible course materials from their post-secondary institutions did not receive their materials until after their course had begun, and 30% of respondents did not receive their materials until later in the semester, or at all.

The most common means through which accessible course material was received was directly through their DSO (50%); approximately a quarter of students sourced their own accessible format course material.

The lack of educational materials in accessible formats, including textbooks, is unacceptable and poses a significant barrier to students with sight loss in college and university. CNIB supports Standards which strongly enforce the mandatory and timely availability of accessible format materials.

### Student Accommodations

Although accommodations are desired, a minority of students (30%) do not consistently receive their desired accommodations, inclusive of 10% who reported never receiving accommodations.

Students reported that accommodations were least effective in labs, co-op placements and clinical placements, and most effective in the classroom environment.

Of note, the effectiveness of accommodations for online learning was intermediate between classrooms and labs/work-integrated learning opportunities.

Of those students who receive accommodations, they obtained accommodations in a variety of forms. The most common accommodation types were:

* Computer/laptop/tablet with specialized software: 71%
* Extended time to take exams: 61%
* Textbooks in e-formats: 52%
* Smartphones: 42.%
* Large print reading materials: 34.%
* Magnifiers: 32.%
* Reduced course load: 31%
* Note taker: 30%
* Reading equipment or portable note taking device: 25%

Despite the diversity of accommodations provided to students, the effectiveness of these accommodations in diverse learning environments (labs and work-integrated learning settings) remains a significant challenge. We strongly encourage Standards and recommendations that enhance effective and appropriate accommodations to students with disabilities in labs and work-integrated learning settings.

### Cocurricular Engagement

An increasing proportion of students with sight loss are participating in cocurricular programming today, compared to previous generations of students – more than 87% of current students or recent graduates participated in at least one cocurricular activity.

For those students who did not participate in cocurricular programming, 51% indicated they had no time, based on their coursework and other commitments, 18% had a lack of transportation, and 10% indicated that the cocurricular programming was not accessible.

Only 40% of students indicated that their accommodation needs were met while participating in cocurricular programming.

CNIB’s previous research on employment has strongly linked engagement with cocurricular learning approaches to increased likelihood of employment; thus, we welcome the recommendation of Standards that would improve the accessibility and availability of cocurricular learning environments to students with disabilities.

### Barriers to Post-secondary Education

Only 25% of respondents indicated that they did not experience any barriers to their participation in post-secondary education. Approximately 40% of respondents identified multiple (more than 4 barriers) to their participation.

The top five barriers to pursuing post-secondary education were identified as:

* Financial: 48%
* Transportation: 38%
* Attitudinal: 38%
* Technological: 38%
* Service: 33%
* Quantity of barriers identified when pursuing PSE:
* 0 barriers: 25%
* 1-3 barriers: 31%
* 4-6 barriers: 30%
* 7-10 barriers: 14.%

### Transportation and Navigation

While attending post-secondary education, various methods of navigation were used by students with sight loss. The most common methods of navigation used were smartphones and memorization of routes.

The following methods of navigation were identified:

* Smartphone navigation: 63%
* Independent memorization of routes: 62%
* Assistance from a friend or family member: 49%
* White cane: 43%
* Independent navigation with occasional assistance from a stranger: 43%

## Initial Impact of COVID-19 on Post-secondary Education Experiences (2020)

Students with sight loss during the early part of the COVID-19 pandemic reported being in a variety of educational situations. The majority were currently attending classes virtually while some were unable to attend class.

Students reported the following attendance:

* Attending classes virtually during pandemic: 48%
* Cannot attend class - school has discontinued classes: 17%
* I have discontinued attending classes because I am not able to access the online environment that my school has moved to: 4%
* Other: 13%
* 92% of schools attended by participants have introduced new technology tools to facilitate access to the curriculum from home.
* 39% of participants say the technology tools are inaccessible to them.
* 60% of students say that they were not provided training on how to use the tools their school has introduced since going online.

Students reported having concerns over their education due to the COVID-19 pandemic; 47% of students had concerns that they would not complete the class, semester, and/or program due to their sight loss combined with the pandemic.

The short-term and long-term impact of COVID-19 on students’ education experiences and timelines remains to be assessed. At minimum, students experienced significant interruptions in the type and quality of their educational experiences because of the pandemic. While this cannot be controlled, efforts can be undertaken to understand it and account for it in future accessibility planning at the institutional level. Furthermore, the pandemic has underlined the deep connection between the technologies we have access to and use, and the impact those technologies have on our educational experiences. The post-secondary education Standards ought to embed this recognition in its considerations of accessibility in the context of the post-secondary student experience.

## Accessibility of Online Learning Study (2021)

The COVID-19 pandemic and the subsequent shift to remote working and online learning environments has amplified the difficulties that people who are blind and partially sighted face when working online. We assessed the difficulties that students with sight loss face when taking online classes at a post-secondary institution.

Our assessment of the literature resulted in three main findings. First, course designers need to consider the end-user and anticipate what a student with accessibility needs may encounter when engaging with online content. Second, rigid and general evaluation frameworks create challenges for developing and administering accessible online content. Third, digital learning spaces must be more conducive for teachers to practice with the tools. There is a need for greater education amongst instructors in the proper usage of Online Learning Modules (OLMS) to teach students more effectively and result in greater accessibility for students with disabilities.

CNIB conducted a national survey to look at students' experiences with the onset of online learning while living with accessibility needs. The survey results support the literature on the topic of students living with sight loss and their educational experiences. From the results of this survey, 62% of respondents noted that their entire learning experience is currently online. Some students have expressed that they are not adequately supported as accessible reading material is often distributed two or three weeks late. Many students' responses also highlighted the general inaccessibility of their coursework, including textbooks, online articles, and the classes themselves.

The findings of this research led to the following recommendations:

* Post-secondary institutions should implement department-wide consistency in their course page layouts.
* Post-secondary institutions should mandate that all PDFs distributed by instructors should be distributed in an accessible format.
* Post-secondary institutions should mandate training in all departments on how to make courses and course content accessible.
* Post-secondary institutions should encourage all instructors who are teaching an online course, which includes no synchronous lecture component, to make use of both reading material and asynchronous video lectures to disseminate course material.

### Survey Results

A national survey was conducted by CNIB to take a deeper look at the experiences with the onset of online learning of students who need accommodations for their studies. There were 103 respondents who detailed their experiences with online learning through fixed answer and open-ended questions. The survey results support the literature on the topic of students who are blind or living with sight-loss and their education experience.

The online learning experience brought on by the COVID-19 pandemic has posed challenges for most students, and 62% of respondents noted that their entire learning experience is currently online. Students who are blind or have some level of sight loss require accessible documents to ensure an equitable learning environment. Despite the need for accessibility, students have expressed that they are not adequately supported by their professors; a few students noted that their professors refuse to accommodate their accessibility needs.

Many students' responses detailed the inaccessibility of their coursework, including textbooks, online articles, and the classes themselves. 42% of student respondents reported that they usually receive their accessible materials two or three weeks after class has started, or at the start date of class. Only 25% of student respondents received their accessible course materials before classes began; this meant many students could not start their work early, which would have reduced their concerns about keeping up with the pace of their courses. The scanned textbooks were not of high enough resolution to be read clearly with a magnifying feature on a computer or tablet, nor could screen readers read the text. Further, students indicated that free textbook materials were completely inaccessible with any screen-reading technology, demonstrating a larger inequity for students with sight loss of low-socioeconomic status.

Lecture recordings, allowing for asynchronous learning, are commonly provided only when students have accommodations for their disabilities, instead of as a default. 70% of students said that 70% to 100% of their classes are synchronous. When students can access recorded lectures, respondents expressed that their learning experience was more positive; they were able to learn at their own speed.

The open-ended survey questions upheld the findings from the literature in that the feedback regarding the general online learning experience is negative for most students who are blind or partially sighted. Responses outlined the reluctance of some professors to use features that make assignment feedback accessible.

Demeanor towards students who ask for further assistance was also poor in some cases. The online learning environment was described by one student as “unwelcoming and unaccommodating,” forcing them to withdraw from their professional program altogether: “Due to the progressive nature of my vision loss, I have had to change my accommodations often throughout my post-secondary education. My vision loss has also caused me to withdraw from a professional program since it was too difficult to find appropriate accommodations for me to complete this program.”

When professors are reluctant to provide adequate assistance, students noted that they look to others for support with their academics, “I have family help for reading. I feel for anyone who doesn't,” “They [the platform] were confusing at first and I have family help. I cannot access on my own,” and, “My program is small, so even my classmates have learned to make the documents we collaborate on accessible. The office for students with disabilities is meant to be providing course material accommodations for my statistics course, and they are not doing so. Hence, the low scores on the above items.” Overall, the data from this survey demonstrates the inaccessibility of the online learning environment for students with disabilities, especially those who are blind or partially sighted.

## Analysis of Recommendations

### Recommendation 1

Post-secondary institutions should implement department-wide consistency in their course page layouts.

One of the challenges revealed during the interview process for one of the students was that at the beginning of every term, they find it difficult to navigate the different course pages because they are all templated differently. The student would have to memorize the layout of each of their course pages at the beginning of each new semester.

Having a standardized template developed by individual faculties and departments would keep students who identify as being blind or partially sighted from having to navigate and subsequently memorize each individual course page at the beginning of each new semester. We feel it is important to implement this measure by department to allow for flexibility between the diverse needs of math-based, science-based, or humanities-based courses. This recommendation can be applied in the short-term, as departments can implement consistent course page layouts before the beginning of the next semester.

### Recommendation 2

Post-secondary institutions should mandate that all PDFs distributed by instructors should be distributed in an accessible format.

Information on resources such as the accessibility office at the institution and document remediation services should be provided to all departments and instructors. This recommendation was largely informed by our interview and survey data. Students living with sight loss noted that many of the PDF documents assigned by instructors as required reading material are not provided in an accessible PDF format. In order to complete their course readings, the students would have to remediate the document themselves, or turn the inaccessible PDF document over to the accessibility office on campus and wait for the document to be remediated. This often leaves the students falling behind on class readings.

Because it is typical practice for instructors to reuse relevant reading material in their courses year after year, professors could keep the accessible documents for future classes. Thus, all students would receive the same accessible document at the same time. This recommendation can be implemented in the short-term, as post-secondary institutions can mandate this rule before the beginning of next school semester.

### Recommendation 3

Post-secondary institutions should mandate training in all departments on how to make courses and course content accessible.

In order to make it cost effective and convenient, we recommend training videos on how to make accessible Word documents, PDF files, and PowerPoint presentations. Each training video should be a separate module that instructors can refer to, when needed. This action would allow for students who are blind or partially sighted to have access to accessible Word or PDF attachments such as course syllabi and assignment instructions. It will also allow such students to study any lecture slides before and after class. Once post-secondary institutions have mandated this training, the creation and distribution of the videos can be achieved within a short time frame, potentially before the beginning of the next school semester.

### Recommendation 4

Post-secondary institutions should encourage all instructors who teach an online course that does not include a synchronous lecture component to use both reading material and asynchronous video lectures to disseminate course material.

Teaching course content through reading material as well as online video lectures makes the content more accessible and digestible to both visual and auditory learners. This also assists students who are susceptible to eye strain and visual fatigue, as they may find that readings-based courses are difficult to keep up with. Post-secondary institutions can begin to encourage professors to disseminate course material through readings and asynchronous video lectures immediately, and instructors will have time to prepare material before the next school semester begins.

Section 1: General Overarching Barriers

## Summary and Gaps

The proposed Standards would apply to publicly funded post-secondary institutions (recommendations 1-2). The Committee recommends that government Ministries work together to achieve actionable change, and the Standards be considered by government sectors outside education that also impact students with disabilities, such as the Assistive Devices Program (recommendations 5-6). The Committee also recommends that the Standards be produced in a plain language form.

CNIB would like the Post-secondary Standards Development Committee to apply these standards to micro-credentialing, as well. We agree that all educational institutions should be encouraged to apply these Standards. Students with sight loss in co-operative education, internships, and clinical placements report the lowest levels of accessibility relative to in-classroom learning.

It is important that professional programs, including employers taking on students in co-operative and other work-integrated learning programs also be named in the Standards. For students with disabilities, professional programs such as healthcare, medicine, and law often act as if they are exempt from providing accommodations and accessible learning due to the perception that professionals with disabilities are either not permitted, or not able to work as healthcare, legal or other professionals.

Micro-credentialing and Continuing Education.

The COVID-19 pandemic led to an initial sharp decline in the employment rate of Canadians with sight loss (as low as 28% in the early months of the pandemic). While this number has since rebounded back to pre-pandemic levels (49% of the working age adult population, as of June 2021), the type and quality of work has shifted in longer-lasting ways. More people are working part-time or are self-employed; more people are working from home; and, most relevant, there is a growing demand for upskilling or reskilling, as people change careers as a result of the pandemic and changes in their job situation. In this light, we expect that a growing number of persons with sight loss will return to some form of post-secondary education; while this may not be a full degree or diploma, it may be through continuing education or the growing industry of micro-credentialing. Consultations held during a panel session at our recent 2021 Connecting the Dots virtual conference support this insight. The recommendations for the post-secondary education Standards are silent on both continuing education and micro-credentialing programs offered by post-secondary education institutions.

It is worth noting that micro-credentialing programs in particular can come in many flavours and forms, may often take advantage of digital learning systems, and, most critically, are touted as being “accessible and inclusive from the beginning”. However, it is unclear exactly what this “built-in accessibility” means or refers to. Also, how do students with disabilities taking a micro-credential program request accessibility solutions or accommodations?

Recent educational outcomes research from CNIB indicates that only 25% of students are receiving accessible learning materials before the beginning of their studies. If students with sight loss are waiting several weeks (as is relatively common), this group of learners may not even begin the micro-credential course before their fully sighted peers have completed the same micro-credential course. This may have an impact on mentoring, collaboration and teamwork skills development, as well as professional networking. If these programs are self-directed (as some are), how will accessibility of educational materials be addressed in a timely manner? What does “extra time” for completion of courseware and assessments mean in this setting? There are many unanswered questions, and it is our belief that the post-secondary education Standards need to apply to micro-credentialing and continuing education programs offered by publicly funded Ontario colleges and universities. For this to not be the case is to invite a looming disaster of inaccessible and exclusive programming, right when the community needs this learning approach the most.

### Section 2: Attitudes, Behaviours, Perceptions and Assumptions

This Section includes recommendations in five areas (transformational leadership, accountability, research/scholarship, awareness, and language), while also recognizing a multidimensional framework is required to shift culture to create lasting attitudinal and behavioural change. The recommendations identify the need for strong leadership from executives in order to influence a culture of accountability, draft a change management strategy (including securing financial support for culture change around accessibility), communicate those plans, and report on progress.

Recommendation 9 should specify that funds be used to not only transition to employment, but work-integrated learning in general. This should also include the collaboration of specialized career services staff working with both students with disabilities, and staff in the accessibility services office. We also note that the change management plans, measurement instruments, and associated reports (Recommendations 7, 8, 12 and 13, as examples) should be available in a variety of formats (ASL, LSQ, plain language, large print/text) and accessible for individuals using screen magnifiers, screen readers, and text-to-speech assistive technologies.

We recommend the assessment instrument in Recommendation 13 collect information about disability type, especially for students with multiple disabilities, and with other intersecting identities, as the experience of disability in post-secondary education varies across disability types and other lived experiences. In particular, the experiences of students with sight loss, dual sensory loss and other low incidence disabilities (e.g., hearing loss, brain injury) are often lost as these groups are small in number compared to the population of students identifying with learning, mental health, and autism spectrum disabilities. Further, these students have very different needs and experiences with different aspects of accessibility (e.g., specific assistive technologies like screen magnifiers, or screen readers) which may translate to highly unique experiences with digital learning.

It is recommended that the Ontario government produce accessible infographics on the outcomes of post-secondary students with disabilities in order to debunk the myth that post-secondary students with disabilities are being served well due to the legislation of the AODA and the Ontario Human Rights Code; this has caused accessibility to be eliminated from many conversations which educational institutions, businesses and other organizations are having around equity, diversity and inclusion. Many employers, students, families and education professionals hold additional unconscious biases around students with disabilities in post-secondary education. Making the data available in an easily digestible format may help change societal attitudes towards this group of students.

### Section 3: Awareness and Training

Nearly 40% of students with sight loss identify technology as a barrier to post-secondary education. CNIB research has identified many recommendations for post-secondary accessibility within the category of training and awareness. Our research broadly indicates the need for training and awareness around how assistive technology (screen readers, screen magnifiers, and text-to-speech software) interacts with a variety of programs (including Microsoft Office, PDF documents, and learning management systems). While many learning management systems offer modules that teach users how to interact with them, these “user tours” do not include specific and concrete steps for how to use learning management systems with assistive technologies. Online learning still includes inaccessible PDFs, and links to inaccessible websites, videos, images and other content.

Instructors require training on how to think beyond their unconscious bias of visual interaction and analysis of a document, in order to consider reading order, and an organization of documents and courses within a learning management system that are accessible to those with sight loss and/or print processing disabilities. Inclusive documents, and course outlines or course pages need to be constructed and planned to be inclusive from the beginning, rather than remediating them after. Many students with sight loss indicated that consistency in the design of online courses would facilitate learning. Our research indicates only 25% of students receive course materials before the start of class, delaying their ability to participate fully in their courses, especially when lectures are not recorded.

Instructors require training around unconscious bias to illustrate how a lack of recordings and asynchronous online learning is a barrier for students with sight loss. This barrier exists in part due to the delay in receiving accessible format materials or assistive technology in order to access course materials. Due to the barriers created by unconscious bias and unprepared professionals in education, many students with sight loss were not engaged in education during the pandemic, and those that were reported significant barriers in accessing course content.

We recommend that Recommendation 23 include reference to training for educators around learning management systems, the experience of navigating both online and other document content using assistive technology (inclusive of screen readers and magnifiers), accessible document design, and unconscious bias from a sighted frame of reference on those topics. Training for educators should also include the creation of accessible PDFs, charts, tables, and diagrams. The training should also be inclusive of the topics of audio narration or audio description of visual material. Professionals also need training to understand the experience of using assistive technology with scanned documents.

CNIB participants communicated that the quality of scanned materials is often inaccessible for them as assistive technology cannot interact with the documents. We also recommend that new technologies not be utilized in instruction until all students, including students with accessibility needs have received training on how their assistive technology interacts with the new learning technology (see Recommendation 71). Responses from our COVID-19 educational check-in questions indicated the 92% of students encountered new technology during the pandemic, and nearly 40% of students with sight loss indicated this technology was not accessible to them.

We also recommend in Recommendation 25 that Disability Services staff receive training around working with students and employers to facilitate accommodations in the context of work-integrated learning.

### Section 4: Assessment, Curriculum and Instruction

As noted in our consultations, the diversity of the learning environments that students with sight loss are participating in has increased, and many more students are enrolling in programs that have multiple learning environments, such as labs, fieldwork, research environments, and work-integrated learning. Our consultations also indicate that the effectiveness of accommodation in non-classroom settings is less than accommodation in classroom settings. To this end, we strongly recommend that the Committee review and strengthen its recommendations in Section 4 to ensure that they are fully applicable to all learning environments, not just the classroom.

We also appreciate that work-integrated learning is a complex jurisdictional issue, and accommodations of students with disabilities may not be a college or university issue in that case. To this end, and recognizing the Ontario government’s continued commitment to work-integrated learning opportunities for all students, we recommend that the Committee and the Ministry of Seniors and Accessibility strongly consider creating a set of guiding principles that colleges, universities and workplaces can adopt around accessibility in work-integrated learning settings.

We would like to reiterate the importance of having the recommendations in Section 4 apply in the context of micro-credentialing. Establishing this guidance early and up-front will ensure increased accessibility of micro-credentialing programs offered by colleges and universities in the long term.

### Section 5: Digital Learning and Technology

The recommended Standards for this section fall into the following categories: accessible technology, planning, procurement support, training, pedagogy, and content.

We recommend the language in this Section clearly differentiate accessibility from usability in relation to technology. Assistive technology should also be clearly defined to include, but not be limited to, screen readers, screen magnifiers, text-to-speech, and speech-to-text software. The recommendations in this section are very general, and we recommend specifically listing the types of technologies that the accessibility plans mentioned in Standards 72 and 73 will include.

In Recommendation 76, we advise that the “accessible digital technology lead” should have practical experience, rather than just knowledge, using types of screen magnifiers, screen readers, text-to-speech, and speech-to-text technologies. Further, they should have experience with using these assistive technologies with learning management systems, and with interacting with PDFs and other document types. We recommend accessibility and useability testing of digital technologies with assistive technology prior to completing the procurement process. We also recommend institutions require accessibility policies from suppliers of learning technologies.

Recommendation 88 recommends that software and training be provided for creating accessible PDF files. While CNIB supports this recommendation, the practice of remediating PDF files is quite difficult and requires significant amounts of time. Also, post-secondary instructors will likely continue to access PDFs created by academic journals and other authors. A PDF document remediation centre or staff group within each institution that is separate from the disability services office is important (see Recommendation 84: Accessible Content, Resources and Processes).

### Section 6: Organizational Barriers

Recommendation 97 is about reasonable caseloads. As students with sight loss, dual sensory loss and other sensory disabilities are low incidence among students with all disability types, we recommend looking at caseload data to see if students with disabilities are being seen often enough by accessibility services staff. Our research indicates that many, but not all students with sight loss indicate they receive adequate visits to the disability services office. Students with multiple disabilities inclusive of sight loss, and dual sensory loss (i.e., Deafblindness) may not be receiving adequate support at the current staffing levels of disability services offices at post-secondary institutions.

We recommend adding research into the list of areas of learning in Recommendation 95, as many graduate students primarily engage in research, which needs clear accommodation policies and processes.

It may also be prudent to mention policies and procedures related to access to the accommodation of a guide dog within a science lab or other learning environment requiring specific safety equipment and procedures. Guide dogs are a safe accommodation for a student with sight loss within a science laboratory. We also recommend training around unconscious biases of addressing where guide dogs can and cannot go. We recommend calling out a policy that includes acknowledgement of guide dogs as appropriate accommodations for students with sight loss within STEM environments, including wet labs (Recommendation 191).

For Recommendation 99 (Accessibility Lens), we recommend collaborating with a variety of groups representing different disability types, as students with sight loss, cancer, hearing loss, or brain injury may not be represented by large pan-disability organizations. We further recommend collaborating with pre-professional student groups, especially in the areas of medical students with disabilities, and other STEM-related groups, as accessibility of science education is not well understood by professionals outside this space.

### Section 7: Social Realms

Our consultations indicated the importance of cocurricular programming to the employment experiences of persons with sight loss, yet only 40% of our respondents indicated they received accommodations in order to participate in cocurricular programming, and more than half did not have the time to engage in cocurricular activities. This section chooses to focus on social realms, with some slight mention of the broader cocurricular context. We believe this is a missed opportunity for the Committee. As with micro-credentialing and work-integrated learning, above, we believe it is important for the Committee to make a stronger statement on cocurricular programming. Without a recognition from the Committee of the importance of cocurricular programming to students with disabilities’ educational experiences and future employment prospects, this community will continue to experience long-term repercussions of under-employment.

### Section 8: Physical and Architectural Barriers

Post-secondary students and graduates with sight loss identified that they primarily use smartphones for navigation of institutional grounds (63.2%). Students also cited receiving assistance from a friend or family member to navigate campus (50%). We recommend that any wayfinding apps, websites, or software to support navigation of campuses be tested for accessibility for text-to-speech software and other assistive technologies.

In our post-secondary outcomes survey, after financial barriers, students experienced significant challenges with transportation to campus as the second most cited barrier to accessing post-secondary education. The Standards recommend that learning be accessible from home and face-to-face in class.

We also recommend that labs, and research centres where students learn or engage in research as part of their academic program be made accessible. Existing regulations on the built environment may not cover these areas of campus or it may not be obvious that these areas need to be addressed from the built-environment perspective.

### Section 9: Financial Barriers

Students with sight loss cited financial barriers as the most common barrier to pursuing post-secondary education in our post-secondary outcomes survey. We recommend protected funding for students with sensory loss, as they may often be out-competed for funding because they are from a low-incidence demographic. We also recommend that the Assistive Devices Program review and modernize the visual aids program, as costs continue to increase as a result of inflation, the COVID-19 pandemic, and other factors.

### Conclusion

We commend the Post-Secondary 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 Post-Secondary 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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