

Communication Disabilities Access Canada

Sept 1, 2015

Parliamentary Secretary Linda Larson Office of the Accessibility Secretariat Room 247, Parliament Building 501 Belleville St Victoria, BC V8W 9E2

Dear Parliamentary Secretary Larson,

We commend you on the launch of Accessibility 2024. We have reviewed the June, 2015 update and congratulate you on the progress that you have made in this first year.

While we applaud these efforts, we would like to draw your attention to the accessibility requirements of people with communication disabilities, not caused by hearing loss. Your document highlights over 100 references to people with mobility disabilities and to accessible building and spaces. There are 40 references to people who have sensory disabilities and to what they require to get information such as alternate formats, sign language interpreting and accessible websites. In contrast there is one reference to people with speech and language disabilities (SLDs) not caused by a hearing loss. In that reference you mention CAYA (Communication Assistance for Youth & Adults), which is a clinical service for people who require augmentative and alternative communication. We agree that it is an extremely essential service, however, communication access goes beyond clinical services as it is about what businesses and organizations need to do in order to make their goods and services accessible to all people who have SLDs.

Approximately 50,000 people in British Columbia have SLDs that significantly impact on their ability to live in their community and to meaningfully access goods, services and opportunities. People with speech and language disabilities may have disabilities such as cerebral palsy, autism, intellectual disability, acquired brain injury, aphasia after a stroke, multiple sclerosis, Parkinson's Disease, ALS and other conditions that impact on a person's ability to speak and / or to understand spoken language. They can experience major barriers when using businesses and organizations such as people ignoring and shouting at them; underestimating their ability to make their own decisions; not giving the time they need to communicate their messages; and not understanding what they are communicating in person over the telephone. Some of these barriers can have serious consequences in situations where communication is critical such as healthcare, emergencies, police, legal or justice services.

The Communication Access Now (CAN) project is a three-year national strategy, operated by Communication Disabilities Access Canada (CDAC), to increase awareness of the accessibility barriers and requirements of people with speech and language disabilities.

131 Barber Greene Road, Toronto, Ontario, Canada M3C 3Y5 Telephone: 416.444.9532 Email: cdac@bell.net Information: www.cdacanada.com Over the past three years, CDAC has conducted extensive research and developed resources about communication access to guide policy makers, legislators, businesses and organizations in making goods and services accessible for this population. As part of the CAN project, we note that the accessibility needs of this population are typically not well understood and tend to be omitted or misrepresented in accessibility legislation.

At this time, we are asking accessibility policy makers to include the accessibility requirements of people who have speech and language disabilities, not caused by hearing loss. Specifically, we are asking for:

- Acknowledgement of people who have communication disabilities, not caused by hearing loss. They are a disability group in their own right and do not all have sensory and / or intellectual disabilities.
- Inclusion of the interactive nature of communication access in face-to-face and telephone communications in addition to the transfer of information via websites and alternate formats.
- Inclusion of examples of communication barriers and accommodations that are relevant for people with SLDs.
- Recognition of the need for effective communication access in essential services (e.g. healthcare, legal, police, justice) and the communication accessibility requirements that are specific to these sectors
- Inclusion of people with SLDs, and / or family members or professionals who can represent their needs on your accessibility advisory committee.

We suggest the following ways that Accessibility 2024 could include the communication accessibility needs of people with SLDs in its implementation and future planning:

- Include the term "communication disability" or "speech and language disability" when listing types of disabilities. This is important because this population is often omitted or erroneously assumed to be included under accommodations for people who have sensory or intellectual disabilities.
- Acknowledge and illustrate the barriers that people with SLDs face, and address the accommodations that can ameliorate these situations. Most of the communication barriers occur within customer service, because people do not know how to interact with individuals who have SLDs. For example: People not knowing how to communicate with someone who has unclear speech or uses a picture, letter board, or communication device.
- Clarify that while universal design may eliminate some physical barriers, there will always be the need for individual accommodations for people who have SLDs. Most of these accommodations are simple and do not cost any money. This is an area that is typically omitted in basic awareness training programs where the concept of communication is limited to alternate formats and accessible websites. Our free online resources include short videos and e-learning modules at http://www.communication-access.org/make-your-service-accessible/make-yourservices-accessible

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- Promote the BC roster of trained Communication Intermediaries. In situations where communication is critical (e.g. healthcare, police, legal and justice services), people with SLDs may require communication intermediaries to assist with communication in the same way as people who are deaf may need sign language interpreting services. This is a CDAC initiated program and you can see the BC roster and get information at http://www.access-to-justice.org
- In your resources, you could add a link to our website <u>www.communication-access.org</u>
- Inclusive Government
 - Include a person with a SLD, family member or a Speech Language Pathologist in the Leadership Group and the Minister's Council on Employment and Accessibility.
- Accessible Service Delivery
 - Use our Communication Access Checklist so that businesses and organizations can evaluate whether their service is accessible for people with SLDs, <u>http://www.communication-access.org/make-your-service-</u> accessible/access-checklist/
 - Have all staff take the e-learning modules that are linked via the Ministry of SDSI's intranet website and available on our site at <u>http://www.communicationaccess.org/make-your-service-accessible/make-your-services-accessible/</u>
 - Consider email as well as phone, online and face-to-face communication when committing to accessible service delivery as many people with SLDs have difficulty communicating over the telephone.
- Employment

In January of this year, a link to our free e-learning modules, <u>http://www.communication-access.org/make-your-service-accessible/make-your-services-accessible/</u> was added to the Ministry of SDSI's intranet site, so that Employment and Assistance Workers have an easy and efficient way to learn how to communicate with people with speech and language disabilities.

- Accessible Transportation
 - For transportation services to be accessible for people with SLDs, drivers, ticket sales staff and telephone operators should take the the CDAC e-learning modules via a link on the Ministry of SDSI's intranet website and available here, <u>http://www.communication-access.org/make-your-service-accessible/make-your-services-accessible/</u>
 - Include a person with SLD on the Access Transit Users' Advisory Committee.
- Inclusive Communities
 - Include the communication access symbol wherever the access symbols for mobility, vision and/or hearing are displayed. This symbol is free and available on our website at <u>http://www.communication-access.org/resources/symbol/</u>
- Emergency Preparedness

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- Communicating with people with SLDs is critical and paramount in emergency situations. See barriers at <u>http://www.communication-access.org/make-your-</u> service-accessible/emergency-medical-services
- Consumer Experience
 - Include a person with SLD on the Rick Hansen Accessibility Team.
 - Include a communication module in the Planat app. We have provided input to the group on what this might include.

We hope that these suggestions are useful and that you can incorporate them into the future developments of Accessibility 2024. Please contact us if you have questions or are ready to be linked to resources and people. Lois Turner, CAN regional coordinator in BC, will contact you in the fall to arrange a meeting to explore issues raised in this letter.

We are posting this letter on our website and social media as we hope British Columbians with speech and language disabilities can support you in making Accessibility 2024 meaningful for them. The letter will be available, along with our letters to other provincial governments at http://www.communication-access.org/resources/can-reviews-accessibility-documents. We welcome feedback and a response from you and would be pleased to share that with our constituents via social media.

Yours sincerely,

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cc. Honourable Michelle Stillwell, Ministry of Social Development & Social Innovation, Room 247 Parliament Building, 501 Belleville St, Victoria, BC, V8W 9E2

Assistant Deputy Minister Molly Harrington, Ministry of Social Development & Social Innovation, PO Box 9936 Stn Prov Govt, Victoria BC, V8W 9R2

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