



Communication Disabilities Access Canada

August 17, 2018

The Hon. Carla Qualtrough, MP
Minister of Public Services and Procurement and Accessibility
House of Commons
Ottawa ON K1A 0A6

Dear Minister Qualtrough,

We are delighted that you are taking the lead on the Accessible Canada Act. We know that you understand the importance of increasing accessibility to goods and services for the half-a-million Canadians who have speech, language and communication disabilities. We are excited to be working with you again, and we will support your efforts in any way we can, to make a barrier-free Canada.

At this time, we have reviewed bill C-81 and applaud the government's work in bringing this legislation forward. We are particularly pleased that you and your team have included communication as a disability category that will be addressed in this legislation.

In order to strengthen the legislation for people with speech, language and communication disabilities, we think that Bill C-81 can be improved in the following ways:

1. Purpose of Act #5

Bill C-81 identifies a number of areas to remove and prevent barriers. These areas include built environments; employment; information and communication technologies; procurement of goods and services; program and service delivery and transportation.

Unfortunately, these areas will not adequately address the accessibility needs of people with speech, language and communication disabilities. We recommend adding "communication" to the list as a domain, similar to built-environment because it applies to all government sectors that deal with the public such as transportation, employment, federal courts, Supreme Court of Canada, public health and safety, Canada Revenue Agency, elections, RCMP and others. The barriers faced by people with communication disabilities occur in face-to-face interactions, telephone communications, meetings, public forums and consultations, reading, writing, and all types of e-communications. These issues may or may not include technology but they cannot all be addressed solely through an information and communication technology lens. This expanded perspective on communication will address

the broad access needs of people with a wide range of neurological, physical, cognitive, and sensory disabilities.

If “communication” is treated as a generic domain, it can then be used as a basic building block that can be customized for specific contexts. For example, all service providers who deal with the public should have basic knowledge and practice guidelines on how to interact with a person who has unclear speech or who uses a communication device and what to do if they do not understand a person’s message. Depending on the context, service providers may also need job specific information. For example, an election officer needs to know how to make voting accessible for people who cannot read or hold a pencil; a justice professional needs to know when and how to engage a communication intermediary who has specific training to assist people communicating in a justice setting; and a person who works with Service Canada needs to know how to make telephone services accessible for people who use communication devices or rely on communication assistants to interpret their speech.

2. Part1: Minister’s Powers, Duties and Functions #16

We recommend that Bill C-81, empower the Minister of Accessibility to work with provinces and territories to develop and expand communication support services and secure funding for the engagement of these services by government entities when they are required.

Bill C-81 focuses on the removal and prevention of barriers, yet many people who have speech, language and communication disabilities also require **human supports** in order to access services. Support services include but are limited to, sign language interpreters, communication assistants, and communication intermediaries. These support services are essential for many people in order to access goods and services. For example, victims and witnesses with communication disabilities may require the RCMP and federal courts to purchase services from communication intermediaries to assist them communicating in these contexts. Many of these communication support services are not currently well developed or funded.

3. The Canadian Accessibility Standards Organization: Board of Directors #22

In addition to representation on the board of directors, we recommend that the majority of CASDO’s committee membership be comprised of people who have different types of disabilities and who therefore, experience different accessibility issues. This organization should include people with speech, language and communication disabilities and professionals who can represent communication accessibility needs and propose evidence-based accessibility accommodations and supports. This is significant because while many provincial regulations focus on a service provider’s attitude and respectful communication practices, they fail to address the wider range of accommodations and supports required by people who have disabilities that impact on their ability to communicate in face-to-face,

telephone, and group interactions, as well as reading, writing and e-communications.

4. Part1: Minister's Powers, Duties and Functions #16

We recommend that Bill C-81, empower the Minister of Accessibility to work with provinces and territories to ensure that people have the assistive devices they require to access goods and services. This includes mobility and communication devices. To attain full accessibility, many Canadians with disabilities need access to clinical services and device funding in order to interact and use government goods and services.

We hope that you and your team will consider our recommendations to strengthen the Act for Canadians who have speech, language and communication disabilities.

We would be happy to meet with you to discuss any of these issues.

Yours sincerely,



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