



Communication Disabilities Access Canada

January 29, 2019

Hon. Raymond Cho, MPP
Minister for Seniors and Accessibility
Ministry for Seniors and Accessibility
Frost Building South
7 Queen's Park Cres., 6th Floor
Toronto, ON M7A 1Y7

Email: raymond.cho@pc.ola.org

Dear Minister Cho,

Re: Information and Communications Standard

Communication Disabilities Access Canada (CDAC) is a national and provincial, non-profit organization that addresses accessibility for people who have speech, language and communication disabilities. Over 165,000 Ontarians have disabilities that affect their communication, that are not caused primarily by deafness or significant hearing loss. Diverse disabilities such as physical, neurological, cognitive, learning, hearing, vision, and linguistic disabilities can affect one or more areas of a person's speech, comprehension, reading and writing. Communication access to goods and services is as important as physical access for people who have little or no speech and who use picture, symbol, letter boards and devices to convey their messages.

The current integrated standards do not provide sufficient directives for businesses and organizations on ways to make their services accessible for people with speech, language and communication disabilities. For example, most people with speech and language disabilities experience significant barriers to services in face-to-face and telephone interactions, group meetings and forums and written communication. These contexts are not adequately or comprehensively addressed in any of the Standards. They are either oversimplified or omitted.

At this time, the Information and Communications Standard primarily focuses on making written information (print and digital) accessible. Examples of accessible formats cited on the Accessibility Directorate's website, include human assistance, large print, text transcripts of audio or visual information, handwritten notes instead of speech, plain language and electronic documents.

Many of these accessibility accommodations are extremely useful and appropriate for people who have speech and language disabilities. However, the accessibility needs of people with speech and language disabilities go beyond access to written information and occur in **face-to-face and telephone interactions, group meetings and written communication**. Many of these contexts are critical communication situations, such as police, legal and justice services, where communication barriers can have serious consequences.

To address this significant gap in the Standards, we propose that the Information and Communications (IC) Standard expand its mandate to include regulations that address two-way, interactive communication for people who have disabilities that affect their communication.

We are recommending:

- The IC Standards Development Committee should include people who have a thorough knowledge and proven track record to represent the communication access needs of people with diverse speech and language disabilities.
- The mandate of this committee should go beyond “processes that businesses and organizations must follow to create, provide, and receive information and communications that are accessible to people with disabilities” to include “processes, and resources to ensure **effective two-way communication in face-to-face, telephone and group interactions and written communication**.”
- Development of regulations, guidelines and resources for:
 - **Face-to-face, telephone and group interactions.** Standards and guidelines are required for all service providers who interact with the public within these contexts, so that they have the knowledge, skills and resources to interact with people who communicate in ways other than speech. They need to know how to make telephone services accessible and how to make meetings and public forums inclusive for people who have communication disabilities.
 - **Communication supports.** Service providers need information about how and when to provide and work with communication assistants, communication intermediaries, sign language interpreters and other formal communication support services. Formal communication assistance services are essential in critical communication contexts such as healthcare, police, legal and justice services. In these situations, appropriate communication support services must be mandatory.
 - **Communication accommodations.** Service providers need information about simple, non-technical communication tools that they may provide when a person has no effective means to communicate. They need clarification on the use of communication devices that people may use.
 - **Writing.** Regulations are required to address writing activities for people who cannot physically write or who cannot write due to learning or linguistic disabilities. Writing includes accessible forms, procedures for note taking and signatures.
 - **Environmental accommodations.** Services need guidelines on creating and designing accessible signage and wayfinding, counter spaces, and elevators with a communication access lens.
 - **Policies** are required for communication procedures in emergency evacuation situations, as well as authentic assistance in critical contexts, including medical assistance in dying, police, legal and justice settings.

We believe that many of these accessibility features could be included in the IC Standard to provide a foundation upon which sector-specific communication standards could be developed, such as transportation, healthcare, education and employment. An example of a generic baseline communication standard would be mandatory training for all service providers on how to communicate with a person who has unclear speech or who uses a communication device. An

example of a sector-specific communication standard would be that healthcare providers must ensure that a communication assistant is authorized by a patient when supporting them in the provision of informed consent to treatment.

Existing resources:

CDAC has developed a range of free guidelines and resources on ways to make services communication accessible. These resources are available for the Accessibility Directorate to promote and use across the province. Our resources include:

1. A database of qualified Communication Intermediaries to assist people with speech and language disabilities communicating in police, legal and justice situations <http://www.cdacanada.com/communication-assistance-database/>. We have information about making justice services accessible at <http://www.access-to-justice.org/>
2. A database of communication assistants who are available to support people with speech and language disabilities communicating at meetings, forums and on committees at <http://www.cdacanada.com/communication-assistance-database/>
3. Our webinar on making services accessible at <http://courses.cdacanada.com/courses/making-your-services-accessible-for-people-with-communication-disabilities/>
4. Our written guidelines on communication access at <http://www.communication-access.org/wp-content/uploads/2018/12/Guidelines-for-Communication-Access-1.pdf>

We would be happy to meet with you and your team to discuss ways we can bring this perspective to the IC Standards committee.

We look forward to hearing from you.

Yours sincerely,



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