



Communication Disabilities Access Canada

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Mayo Moran
Dean of the Faculty of Law
University of Toronto
Faculty of Law
84 Queen's Park
Toronto, ON M5S 2C5

Dear Dean Moran,

We are pleased to submit this brief as a contribution to your review of the implementation of the AODA. While we recognize that people with sensory, cognitive and/or mobility disabilities are benefiting from the roll-out of the AODA, we want to draw your attention to the omission of the accessibility requirements of people who have speech and language disabilities, not caused by hearing loss.

Over 165,000 people in Ontario have speech and language disabilities that significantly impact on their ability to access goods and services. There is ample research that attests to the communication barriers experienced by this population when accessing services. Many of these barriers can be addressed through stronger, more inclusive legislation, clearer guidelines and educational resources that support businesses and organizations to communicate effectively with people who have speech and language disabilities.

Background

- Ontarians who have speech and language disabilities may have cerebral palsy, autism, cognitive disability, traumatic brain injury, aphasia after a stroke, dementia, Amyotrophic Lateral Sclerosis, Parkinson's disease, Multiple Sclerosis or other conditions.
- Effective communication is an essential component to access businesses and services. However, it is critical in healthcare, emergency, legal and justice services.
- Communication access in existing legislation and guidelines is restricted to the provision of alternate formats, providing sign language and accessible websites. It fails to include the communication access requirements of people with speech and language disabilities which include understanding what is being said; having one's messages accurately understood; using one's preferred method of communication such as speech, gestures, writing, pointing to objects or pictures, spelling words, typing on a communication device or human assistance; receiving written information in ways that can be understood and used and having accommodations to sign documents, take notes and complete forms.

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- Most people with speech and language disabilities can be effective communicators if the person with whom they are interacting knows how to communicate with them.
- People with speech and language disabilities can experience major barriers when accessing goods and services due to service providers who lack information, skill, resources and supports.
- Communication barriers can have serious consequences within essential services such as health care, police, emergency, legal and justice services.
- Unlike other vulnerable communicators, such as people who are Deaf who have sign language interpreting services or people who require language translation services, there are currently no trained communication assistance services to support people with speech and language disabilities to communicate effectively within essential services.
- There is a lack of clarity in existing legislation and guidelines relating to the use and / provision of communication assistive devices and how these devices fit into the bigger picture of accessibility to goods and services within different sectors.
- People with speech and language disabilities are typically not aware and have little support to learn about their accessible rights, to negotiate the accommodations they require or to participate on accessibility committees or at consultations.
- Communication access for people with speech and language disabilities is often omitted, or oversimplified within accessibility training programs and ADO resources.

Communication access

We are requesting that the AODA be strengthened to include the accessibility requirements of people with speech and language disabilities and that the ADO provide funding and support to increase the capacity of businesses and organizations to extend access to goods and services to this population. We would like to propose:

- A broader definition of communication access to include comprehension and expression of spoken and written language.
- Guidelines to support organizations to identify potential communication barriers for people with speech and language disabilities in the contexts of face-to-face interactions (in person); group; public events; telephone; reading; writing; internet and social media.
- Clear standards and guidelines to reduce communication barriers in generic, businesses and organizations that provide services via face-to-face interactions; group; public events; telephone; reading; writing; internet and social media.

- Clear standards and practices for essential services where communication is critical, such as healthcare, emergency, police, legal and justice services. This includes communication access policies and procedures, staff training in communication, access to communication assistants to help with communication, appropriate picture, alphabet boards and other communication tools. These policies and trainings must be provided and monitored by an external organization with expertise in the accessibility needs of people with diverse communication disabilities.
- Development of communication assistant services to support people with significant speech and language disabilities to communicate effectively within health, legal and justice services. These services would be comparable to sign language services for people who are Deaf or intervener services for people who are DeafBlind.

I am enclosing the following supplemental information about:

- Communication Disabilities Access Canada
- Communication Access Now
- Fact sheet
- Quotes
- Sample accessibility barriers for people with communication disabilities
- Communication Access
- Making services communication accessible
- The communication access symbol
- Putting communication into accessibility legislation

We hope that you can include people with speech and language disabilities in the AODA and make recommendations on ways to implement meaningful access to all goods and services for this population.

Please let me know if you have any questions.

Sincerely,

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