



## Communication Disabilities Access Canada

August 5, 2015

Ms. Yutta Fricke  
Executive Director  
Disabilities Issues Office  
630-240 Graham Avenue  
Winnipeg, Manitoba  
R3C 0J7

Dear Ms. Fricke,

We commend you for producing the Guide of Public Sector document "How to Create your Accessibility Plan." It is an excellent resource that is clearly written to help public sector agencies develop their plan to comply with the Accessibility for Manitobans Act. We are pleased that you included people with communication disabilities in your disability listing on page 8 and that you asked readers to consider barriers relating to communication on page 12. As it stands, this document makes a contribution in recognizing the accessibility requirements of this population.

We recognize that it is challenging to represent the accessibility needs of all disability groups. However, we would like to draw your attention to the fact that your accessibility plan provides over twenty references to access to building and spaces; forty references to alternate formats, websites and reading and writing accommodations and nineteen references to telecommunications accommodations for people who are Deaf or hard of hearing. In contrast, there are only seven references to barriers and accommodations that are significant for people who have communication disabilities, not caused by hearing loss. Given that there are 16,500 people in Manitoba who have speech and language disabilities, we would like to suggest ways that you can increase representation of this population in future policy, procedures and guidelines.

We suggest:

- Working groups should ensure representation of people with speech and language disabilities and / or a Speech Language Pathologist who can represent the needs of this population. In addition, public consultations should be accessible for people with communication disabilities (page 5). It is important to highlight this point, as most accessibility committees across Canada do not include representation of this population.
- Communication barriers could be added on page 9. For example, the wording could be:  
*Communication barriers - when a service provider does not know how to interact with a person whose speech is unclear or who communicates using a picture, symbol, letter board or device.*
- Information and Communication barriers should be separated on page 9. See above suggestion. The example given is more in line with an information barrier as we define communication to be an interaction between two or more people.
- Appendix A - Glossary. We suggest adding more definitions about communication access. These might include:

- *Communication Access is what people who work in businesses and organizations can do so that individuals who have speech and language disabilities can understand what is being said, have their messages understood, and use their preferred ways of communicating in face-to-face interactions, over the telephone, at meetings and events.*
- *Communication Intermediary – A Communication Intermediary is a Speech-Language Pathologist with additional training to assist people with speech and language disabilities to communicate in police, legal and justice situations.* This is important to add along with your inclusion of sign interpreters, as communication intermediaries are an essential accessibility service for this population within these contexts. This is a CDAC initiated program and you can see the Manitoba roster and get information at <http://www.access-to-justice.org/>
- *Communication Methods – picture, letter and speech output devices that people with speech and language disabilities may use to communicate their messages.*
- Add communication to definition of “Person with disabilities” (page 23)
- Appendix B – Barriers and Solutions
  - Information and communication barriers (page 26) – in the introduction sentence please add *....or convey what they want to communicate to another person.*
  - Please add an example of an interaction barrier (page 26) under Barriers. For example: *Service provider doesn't understand what a person with unclear speech is saying or how to communicate with someone.* Possible solutions - *Ask the person to show or tell you how they communicate, be patient, and move to a quiet area.*
  - Technological Barriers (page 27) – Add under Barriers you could add a barrier for people with communication disabilities. For example: *A person who can't speak can't communicate effectively over phone.* Possible solution - *Ask the person how they want to communicate over the phone or if they would prefer to use email or text.*
  - Systemic barriers (page 28) – An example for people with communication disabilities might be: *People with communication disabilities not being able to communicate their message at public meetings.* Possible solution: *Provide the agenda ahead of time, so that people can prepare their messages and provide assistants who can support people communicating at the event.*
  - Physical and Architectural Barriers (page 29) – An example for people with communication disabilities might be: *Have signs that are easy to see and understand and include the communication access symbol.*
- Appendix C – Add our organization to inform people where they can get more information and free e-learning modules about communication access:
  - **Communication Disabilities Access Canada**  
 131 Barber Greene Road, Toronto, Ontario, M3C 3Y5  
 Phone: 416 444 9532  
 Website: [www.cdacanada.com](http://www.cdacanada.com)  
 Communication Access Now: <http://www.communication-access.org/>  
 Communication access to justice: <http://www.access-to-justice.org>

- Appendix D - Checklists – add examples of communication access. We have a communication access checklist at <http://www.communication-access.org/make-your-service-accessible/access-checklist>

For example:

- Communication checklist (page 36). Add the following
  - Ensure staff who interact with the public have information and training in how to communicate with people who have speech and language disabilities in face-to-face and telephone interactions.
- Meeting and Event Checklist (page 37, 38, 39). Add the following
  - Display the communication access symbol
  - Send out agenda ahead of time
  - Provide communication assistants to support people communicating at events

We hope that you find these suggestions useful and that you can incorporate some or all of them into future documents. Please let us know if you have questions or if you require clarification and resources on any of these issues.

We are sharing this letter on our website and social media as we hope Manitobans with communication disabilities can support you in making the Accessibility for Manitobans Act meaningful for this population. We welcome feedback and a response from you and would be happy to share that with our constituents on our site and social media.

Yours sincerely,

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