



Communication Disabilities Access Canada

August 27, 2015

Mr. Joe Rudderham
Executive Director
Disability Support Program
NS Department of Community Services
P.O. Box 696
Halifax, NS B3J 2T7

Ms. Anne MacRae
Executive Director
NS Disabled Persons Commission
MacDonald Building
2131 Gottingen St
P.O. Box 222 CRO
Halifax, NS B3J 2M4

Dear Mr Rudderham and Ms. MacRae,

We commend you on the recent release of the Report and Recommendations from The Minister's Advisory Panel on Accessibility Legislation, *Access and Fairness for All Nova Scotians (June 2015)*. The document is well-organized, easy to read, and provides a person-centered pathway to improving inclusion across the province of Nova Scotia. We are pleased to see a number of references to communication barriers throughout the working document and hope that the emerging legislation will include the accessibility requirements of people who have speech and language disabilities, not caused by hearing loss.

The Communication Access Now (CAN) project is a national, 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. 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.

In December, 2014, Debbie Maund, CAN regional coordinator was pleased to meet with your panel members and to share information about communication access during the public consultation held in Amherst.

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. 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.

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 report provides over 54 references to people with mobility needs and access to building and spaces as well as 36 references to people who have sensory disabilities and many who may require alternate formats, websites, sign language interpreting, as well as reading and writing accommodations. In contrast, there is no mention of people who have speech and/or language disabilities, not caused by hearing loss and to the unique barriers and accommodations they might require. In your document, "communication" appears to focus on the needs of people who have sensory, physical or cognitive disabilities and on ways to convey information to people who have these disabilities. It fails to address the accessibility requirements of people with speech and language disabilities which includes expressive communication in face-to-face interactions, over the telephone and at public meetings. While some of the accommodations you mention are appropriate for some people with speech and language disabilities (e.g., alternate formats, accessible websites, plain language documents), it is important to also include the human behavior of people when they interact with individuals who have communication disabilities. These accommodations go beyond being respectful and they are often easy and do not cost a great deal of money. They can be addressed mainly through increased awareness and staff training.

Given that there are 9,000 people in Nova Scotia 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:

- Glossary of terms (p.vi)
 - We suggest a definition of communication to be the transfer of information from one person to another in face-to-face interactions, over the telephone, and through reading and writing. While you have listed some of the methods about how this can be done, the key factor that is missing for people with speech and language disabilities is the interaction – which includes comprehension and expression. If you want to list methods, we suggest using a new heading – Communication Methods and include speech, picture, letter and speech output devices.
 - It would be good to add a definition for Communication Access. 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.

- o We would like you to add Communication Intermediary as an example of a support services such as a sign language interpreter. A Communication Intermediary is a Speech-Language Pathologist with additional training from CDAC 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 Nova Scotia roster and get information at <http://www.access-to-justice.org>
- o Disability: Please add communication to physical, mental, intellectual or sensory impairments.
- Representation: Page 5. Ensure you have representation for this population on your advisory panel, accessibility board and / or topical committees. This could be a person with a speech and language disability or a speech-language pathologist who can represent the accessibility needs of this diverse population. Communication disabilities are very diverse – a person who uses a communication device and has cerebral palsy may not be able to represent the needs of a person who has aphasia after a stroke.

It is important to have a broad representation, as the accessibility needs of the population are often omitted, simplified or misrepresented. Throughout the Communication Access Now (CAN) project we have noted that across Canada, people with communication disabilities are typically not engaged in providing input to emerging accessibility legislation. Many of them are not aware of their communication access rights and as part of the CAN project, we have provided training and resources to support people with communication disabilities to participate and contribute to this important legislation. We would be pleased to connect you with people in Nova Scotia who may be interested in contributing at a committee level.

- Principles: Page 7. We support your principles for inclusion in enabling legislation. We would add that many people with communication disabilities require supports in addition to the removal of barriers. Examples of supports would be a qualified communication intermediary to assist people with communication disabilities communicating with police, legal and justice professionals or a transportation dispatcher who has taken training in how to communicate with people who have communication disabilities over the telephone.
- Purpose: Page 8. Accessible information and communication. In this section, you focus on accessing “information and communication that people need” (e.g., formats and technology). While it is important to get information, people with communication disabilities, not caused by hearing loss have specific accessibility requirements relating to other people understanding what they are expressing in face-to-face interactions, communicating over the telephone and at public events. This goes beyond attitude and respect and requires the people with whom they are

communicating to know how to interact with a person whose speech is unclear or who communicates using a picture, symbol, letter board or device. The interactive nature of communication is essential to access all businesses and organizations. It is critical within essential services such as healthcare, education, emergency services, police, legal and justice situations.

- Purpose: Page 9. Education and Healthcare. We are pleased that you have identified some key sectors for people with disabilities. In our research, people with speech and language disabilities, identified all sectors as needing to improve in communication access and especially government services, healthcare, emergency, police, legal and justice services. For information, see Collier, B. Blackstone, S., & Taylor, A. (2012). Communication Access to Businesses and Organizations for People with Complex Communication Needs. Augmentative and Alternative Communication.
- Standards Development: Page 14. We support the citation at the end of this section. However, we would add communication intermediary services to assist people with speech and language disabilities.
- Monitoring and compliance: Page 16. While some universal design principles apply to people with communication disabilities, many do not. We suggest that you may want to reference our communication access checklist at <http://www.communication-access.org/make-your-service-accessible/access-checklist>
- Public Education / Awareness: Page 19. In addition to education about attitudes and awareness, we hope that you will include basic information on how to communicate with people whose disability is speech or language based. This involves information on how to interact with a person who has unclear speech, or a person who has difficulty understanding what another person is saying or who uses a picture, letter board, communication device or someone to assist them to communicate. 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-your-services-accessible>
- Other Standards Related to the Standards and Policies: Page 21. Accessible Information and Communication. This section is heavily weighted on access accommodations for people with sensory or intellectual disabilities and could include some examples of access for people with speech and language disabilities with a focus on comprehension and expression in face-to-face, telephone and group communication contexts. We are pleased that you highlight the need for services, assistive technology and supports that people to communicate and access information. In Ontario and British Columbia, augmentative communication services and devices are provided through specialized clinical programs. They are essential for people who have little or no speech and a key component to accessing goods and services. It may be necessary to clarify that the provision of

speech generating devices is not the responsibility of a business or public sector service.

In addition to sign language services, we suggest you add communication intermediaries in essential services.

- Transportation: People with speech and language disabilities report communication barriers relating to booking transportation and communicating with untrained dispatchers and drivers.

We hope that these suggestions are useful and that you can incorporate them and our resources into future documents as you move forward with your legislation. Please let us know if you have questions or if you require clarification on any of these issues. We would be happy to meet with you, provide an information session or explore ways to increase representation of the accessibility requirements of this population.

We are sharing this letter on our website and social media as requested by Nova Scotians who have speech and language disabilities. We welcome your response and would be happy to share that with our constituents on our site and social media.

Yours sincerely,

Barbara Collier, Reg. CASLPO., F. ISAAC
Executive Director
Communication Disabilities Access Canada
Project Manager, Communication Access Now (CAN) Project
www.cdacanada.com
Email: Barbara.collier@sympatico.ca
Tel: 416 444 9532

cc: The Honourable Joanne Bernard, Minister of Community Services, 8th Floor, Nelson Place, 5675 Spring Garden Road, PO Box 696, Halifax, NS B3J 2T7

Deborah Maund, M.Sc., SLP (C), Regional Coordinator for Atlantic Canada, Communication Access Now (CAN) Project, 36 Bissett Ave, Moncton, NB E1E 2T1
Email: debbie.maund@speechpath4u.ca