



**Communication Disabilities Access Canada**

September 25, 2015

Hon. Clyde Jackman  
Minister Responsible for Status of Persons with Disabilities  
P.O. Box 8700  
Confederation Building  
St. John's, NL A1B 4J6

Dear Honorable Jackman,

We commend you and your team on the release of the Action Plan for Access. Inclusion. Equality: Provincial Strategy for the Inclusion of Persons with Disabilities in Newfoundland and Labrador (2015). Similar to the original document (2010), it is well-organized, easy to read, and provides an integrated and cohesive approach that recognizes that accessibility includes accessible community businesses and organizations as well as disability services and programs. We look forward to further updates on your work to make Newfoundland and Labrador more accessible and inclusive for people with disabilities.

While we applaud the work of your Ministry, the Provincial Advisory Council for the Inclusion of Person's with Disabilities and the Disability Policy Office, we want to draw to your attention the omission of the accessibility requirements of people who have speech and language disabilities, not caused by hearing loss. This is disappointing as in your letter to us, dated December 16, 2014, you thanked us for the information that we sent to you and said you would share it with the Disability Policy Office. Since then, we have requested but have not received an invitation to meet with your Disability Policy Office.

We recognize that it is challenging to represent the accessibility needs of all disability groups and we realize that your documents take a broad perspective on disability issues. However, we think it is significant that the Action Plan provides approximately 43 references to people with mobility disabilities and their access requirements to buildings and spaces and over 20 references to people who have sensory disabilities and their need for alternate formats, websites and 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 the unique barriers and accommodations they might require when using businesses and organizations. In your documents "communication" appears to narrowly focus on the needs of people who have sensory, physical or cognitive disabilities and refers to assistive technology as well as ways to convey information to people who have these disabilities (e.g. alternate formats, accessible websites, plain language documents). The documents fail to highlight the accessibility requirements of people with speech and language disabilities that include communicating in face-to-face interactions, over the telephone and at public meetings. These accommodations go beyond "attitude" and communication must be addressed as a unique domain in its own right.

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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. To date, the accessibility needs of this population have been omitted, over simplified or inaccurately represented in provincial accessibility legislation and guidelines. CDAC is the only organization that is currently conducting research and developing guidelines around accessibility and human rights for people with speech and language disabilities. With funding from the Office for Disability Issues, CDAC is working with provincial accessibility policy makers across Canada to find ways to meaningfully include the accessibility needs of this population.

There are over 6,800 people in Newfoundland and Labrador who have speech and language disabilities, not caused by hearing loss. They 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 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 would like to suggest ways that you can increase representation of this population in the roll out of your provincial strategy.

Specifically, we ask for:

- Acknowledgement of people who have communication disabilities, not caused by hearing loss. They are a disability group in their own right and do not all have sensory and / or intellectual disabilities.
- Inclusion of the interactive nature of communication access in face-to-face and telephone communications in addition to the transfer of information via websites and alternate formats.
- Inclusion of examples of communication barriers and accommodations that are relevant for people with speech and language disabilities in all sectors but especially where communication is critical such as healthcare, emergency, education, police, legal and justice services.
- Inclusion of people with speech and language disabilities, and / or family members or professionals who can represent their needs on your accessibility advisory committee.

With reference to your current and future documents, we suggest the following ways to strengthen the inclusion of people with speech and language disabilities, not caused by hearing loss:

- A broader definition of communication that involves the transfer of information from one person to another in face-to-face interactions, over the telephone, and through reading and writing. While this is important to get information via alternate formats and accessible websites, people with communication disabilities, not caused by hearing loss, have specific

accessibility requirements relating to comprehension and expression of their messages which 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.

- A definition for Communication Access that is about 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.
- Inclusion of examples of barriers experienced by people with communication disabilities. For example, a police officer cannot understand what a person who has a speech disability is saying; a receptionist hangs up the phone on a person who uses a communication device because they think it is an automated sales call; a doctor cannot get informed consent from a patient because she is not sure if the patient, who has aphasia after a stroke, understands what she is saying. You mention that you will conduct a review of barriers for different sectors. We refer you to a list of barriers and recommendations that we have compiled, which is available on our website at <http://www.communication-access.org/make-your-service-accessible>.
- People with speech and language disabilities require meaningful accommodations when they access community businesses and services. As this is an area that is new, we hope that you can share our communication access checklist and guidelines. The checklist is at <http://www.communication-access.org/make-your-service-accessible/access-checklist/> and the guidelines are at [http://www.communication-access.org/wp-content/uploads/2015/07/CDAC\\_Booklet\\_SR.pdf](http://www.communication-access.org/wp-content/uploads/2015/07/CDAC_Booklet_SR.pdf)
- Communication crosses all sectors. One cannot access any business or services without communication. Communication is two-way and cannot be addressed solely by the provision of a communication device. Most of the barriers experienced by people with SLDs are due to the people with whom they are communicating. There are many things that staff in businesses and organizations can do. Most of these things do not cost money. People who work in businesses and organizations can take our free e-learning modules at <http://www.communication-access.org/make-your-service-accessible> . These modules are available to you when you start to procure accessibility and inclusion guidelines.
- The interactive nature of communication is essential to access all businesses and organizations. You mention education, employment, transportation, healthcare, home support, information and communications. In our research people with communication disabilities identified sectors where communication is critical as healthcare, education, emergency services, police, legal and justice situations. In addition, they highlighted the need for government services to improve their communication (Collier, B. Blackstone, S., & Taylor, A., 2012).
- People with speech and language disabilities may require communication assistance when accessing the justice system. For example, a communication intermediary may be required to assist a person communicating with police, legal and justice professionals. 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. It is important to add intermediaries, along with your inclusion of sign interpreters as communication intermediaries, are an essential accessibility service for this population within these contexts and especially within supported-decision making situations. This is a CDAC initiated program and you can see the Newfoundland and Labrador roster and get information at <http://www.access-to-justice.org>

- Add communication to physical, mental, intellectual or sensory impairments. Communication disability, like mobility or physical disability is a domain and crosses many diagnostic groups (e.g. intellectual disability, autism, ALS, MS, stroke, cerebral palsy etc.). Having a communication disability does not mean a person has a hearing loss or intellectual disability, therefore they must be recognized as a distinct disability group.
- Ensure you have representation for this population on your advisory panel, accessibility board. 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.

We hope that these suggestions are useful and that you can incorporate them into future documents as you move forward with your legislation. Please let us know if you have questions or if you require clarification and resources on any of these issues.

Our CAN projects end in March 2016, however, before then, we would be happy to meet with you and / or the Disability Policy Office to provide an information session or explore ways to increase representation of the accessibility requirements of this population. If funding permits, we would also be willing to participate at your Accessibility Summit in 2016.

We are sharing this letter on our website and social media as requested by people in Newfoundland and Labrador who have speech and language disabilities. Along with our feedback to other provinces, it is available at <http://www.communication-access.org/resources/can-reviews-accessibility-documents/> . We welcome your response and would be happy to share that with our constituents on our site and social media.

Yours sincerely,

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