



Communication Disabilities Access Canada

September 8, 2015

Ms. Ann Hoy  
Assistant Deputy Minister  
Accessibility Directorate of Ontario (Canada)  
Ministry of Economic Development, Employment and Infrastructure,  
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ON M7A 2E1.

Mr. Alfred Spencer  
Director, Outreach and Strategic Initiatives Branch  
Accessibility Directorate of Ontario (ADO) (Canada)  
777 Bay St,  
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ON M5G 2B3.

Dear Ms. Hoy and Mr. Spencer,

Thank you for sharing the 'Handbook for Accessible Employment: Under the Accessibility for Ontarians with Disabilities Act'. The Handbook is well written and will assist many potential employers in providing accessibility accommodations for employees who have disabilities. However, it falls short by not including the accessibility requirements of people who have speech and language disabilities (SLDs), not caused by hearing loss.

As you are aware, Communication Disabilities Access Canada (CDAC) aims to increase awareness of the accessibility barriers and requirements of people with speech and language disabilities (SLDs). Over the past six years, we have met with you and shared our resources and information with you. We have offered to do trainings for you and staff at the Accessibility Directorate (ADO) and to provide input into your standards and guidelines via our current national communication access project. Therefore, it is very disappointing and frustrating to yet again see the omission of this population's needs in an ADO government document.

The omission of people with communication disabilities can be strongly illustrated by the fact that in the handbook that there are **67** mentions about people with mobility disabilities and examples on how to adapt spaces, buildings and equipment. There are **68** mentions about people with sensory disabilities and the accommodations they may require in accessing information. In contrast there is only **1** mention of the needs of people who have communication disability not caused by hearing loss (page 12). Yet, people with speech and language disabilities experience significant challenges finding or keeping employment and

they may require accommodations that relate to how they communicate in face-to-face interactions, over the telephone, at meetings and public events. Their employment and communication access accommodations are just as significant and valid as those of other disability groups. This document was an opportunity for ADO to educate potential employers about this population. Yet, you failed to take this opportunity and in doing so, you continue to exclude the needs of this population.

We remind you that there are 165,000 people in Ontario who have speech and language disabilities that significantly impact on their ability to live in their community and to meaningfully access goods, services and employment opportunities. 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. They do not all have a hearing loss or an intellectual disability.

People with speech and language disabilities tell us they experience barriers when finding employment. These include:

- Lack of opportunities in all types of work - full time and part-time employment; ad hoc engagements, and volunteerism
- Lack of supports for work engagements if they need these (e.g. attendant services, communication assistance) and employers who are unable or unwilling to incur costs of assistant services
- Lack of flexibility to accommodate their requirements in terms of fatigue and stamina during work engagement
- Lack of vocational rehabilitation and employment support services that can accommodate and support their communication methods and / or their communication assistive technology
- Lack of initiatives to create meaningful work opportunities for people with SLDs who cannot find mainstream work engagements
- Lack of collaboration between communication disability services, vocational rehabilitation and employers
- Lack of information, supports and assistive technology funding sources for people with SLDs who are self-employed (e.g. computers, internet access)
- Lack of work experiences for young people with disabilities, leading to a lack of experience and qualifications for entry-level jobs
- Lack of or inadequacy of insurance benefits to cover medical and dental services, wheelchairs and assistive technologies that may be more fully covered by government social assistance programs
- Paid work may result in reductions to social assistance benefits or loss of subsidized housing opportunities and be inadequate to support living in an accessible market rent apartment.

People with SLDs tell us that potential employers should know:

- Our ability to speak is not a reflection of our ability to work or the contribution we can bring to an organization or business
- We may need assistive technology and /or human assistance when working
- Some of us may need flexibility in our work hours due to stamina, fatigue levels and

- appointments related to our disability
- For those of us who are self employed, we may need funding sources for the assistive devices and human supports we may need
- Employment services, the education system, rehabilitation services and communication services need to collaborate on expanding job training and work opportunities for us
- Potential employers should consider innovative ways to engage us to meaningfully contribute to their organization such as allowing us to work from home and/or communicate via e-mail.

At this time, we ask the ADO to include the accessibility requirements of people who have SLDs, not caused by hearing loss in future documents or by adding an appendix to the existing handout.

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 within employment situations.
- Inclusion of people with speech and language disabilities, and / or family members or professionals who can represent their needs on your accessibility advisory committee.

We suggest the following to strengthen the Handbook:

## **Section 2: Accommodations solutions**

Add: Employees Who Have a Speech and Language Disability. Based on the format used within the Handbook, we suggest:

Depending on the cause of the disability, a communication disability may affect how a person speaks and / or understand what others are saying. Some people may have unclear speech. Others who may have little or no speech may effectively communicate using picture or letter boards or speech output devices.

### **Possible Accommodations**

#### **When communicating with an employee face to face:**

- Use your normal tone and volume
- Ask the person what you can do to make communication go smoothly. They will give you instructions.
- Watch and listen carefully, as the person may use a communication display or a device

- Give the person lots of time to communicate what they want to say

**When communicating in a group, meeting or training session:**

- Send the agenda ahead of time so that the person can prepare messages on topics
- Ask the person if they require someone to read out what they are pointing to on their display or device
- Ask the person what signal they will use to let people know they want to communicate something

**When communicating with an employee by telephone:**

- Ask if they prefer to use email, voice over internet, message relay service or text
- If using the phone, find out if the person wants to use speech, computer speech or a speech generating device.

**Other accommodations**

- Ask the person if they require assistance with reading, understanding text
- Ask the person if they require assistance signing documents and writing

**We suggest that you add an example of a person with a SLD in your situation scenarios**

For example: An accountant wanting to return to work after a car accident and unable to speak.

The employee was able to return to work using a speech output device, a hands-free phone and an adapted computer. The speech output device was prescribed and funded by Ontario's Assistive Devices Program. The employer provided a hands-free phone, a keyguard for his computer keyboard and a predictive software program that allowed the employee to type by entering a few letters of a word.

While we recognize that the ADO does not endorse the work of organizations, we think potential employers need to know where they can get more information. The information on our website is free and we would appreciate if you could share it in your section on where to get more information. Our communication access website link:

<http://www.communication-access.org/>

We hope these suggestions are useful and that you can share them with employers. We would be pleased to meet with you and to discuss these recommendations.

We are sharing this letter on our website and social media as we hope people with communication disabilities in Ontario can support you in creating more employment opportunities for them. The link on our website is <http://www.communication-access.org/resources/can-reviews-accessibility-documents>.

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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cc. The Honourable Brad Duguid, Minister of Economic Development, Employment and Infrastructure, Minister Responsible for the Accessibility Directorate of Ontario, 8<sup>th</sup> Floor, Hearst Block, 900 Bay Street, Toronto, Ontario M7A 2E1.

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