



Communication Disabilities Access Canada

January 25, 2019

Senator Jim Munson
The Senate of Canada
Ottawa, ON K1A 0A4

Email: jim.munson@sen.parl.gc.ca

Dear Senator Munson,

Re: Accessible Canada Act

It was a pleasure to meet with you about Bill C-81 on Oct 2, 2018 and on behalf of CDAC, we are delighted that you will be taking the Bill through the Senate process.

When we met, we discussed the importance of communication access for people who have a broad range of disabilities that affect their communication, including people who have cerebral palsy, autism spectrum disorder, intellectual disability, acquired brain injury, aphasia after a stroke, Amyotrophic Lateral Sclerosis, Parkinson's Disease and Multiple Sclerosis. We talked about the impact that these disabilities have on a person's communication in face-to-face and telephone services, at meetings and public forums and when reading and writing.

We are confident that you understand the significance of communication access in your role as advocate for individuals with autism spectrum disorders and through your work as a journalist. We think you will agree that communication access is as important as physical access to a building or space.

We are excited about the possibility of the Accessible Canada Act (ACA) being the first piece of legislation that will provide inclusive communication standards for people who have diverse disabilities that affect their communication, including people who have physical, neurological, cognitive, learning, hearing, vision, and linguistic disabilities that affect one or more areas of their speech, comprehension, reading and writing.

As you know, Canada recently signed the Optional Protocol to the United Nations Convention on the Rights of Persons with Disabilities (CRPD). The CRPD endorses the rights of people with communication disabilities to access and participate equally in society, yet it does not specify what needs to be done for people to effectively communicate when accessing goods and services. At this time, there are very few international examples of legislation that addresses accessibility to services for people with diverse communication disabilities. The

ACA provides a unique opportunity for Canada to play a significant leadership role in developing inclusive communication access standards.

To that end, we have some recommendations for ways the ACA could meaningfully address communication access. These include:

#5 - Develop generic, inclusive, baseline communication standards before other sector-specific standards.

Rationale: Generic, baseline communication standards must be developed first because, like built-environment standards, communication access applies to all jurisdictions. Establishing a baseline for communication access will form the foundation for sector-specific standards. Service providers need to know what they are expected to do in order to make their services accessible for people with a wide range of disabilities that affect their communication.

Inclusive, baseline communication standards should be developed at all points of service provision and be tailored for specific contexts. Examples include:

- **Face-to-face, telephone and group interactions.** Training is required for all service providers who interact with the public within these contexts, so that they have the knowledge and skills to interact with people who communicate in ways other than speech. They need to know how to make telephone services accessible and how to make meetings and public forums inclusive for people who have communication disabilities. People with disabilities that affect their communication must be employed as the primary trainers.
- **Communication supports.** Service providers need information about how and when to provide and work with communication assistants, intermediaries, sign language interpreters and other formal communication support services.
- **Reading and writing.** Service providers need information and resources to provide documents in plain language and alternate formats. They need to know how to provide and use non-technical communication tools and how to make websites and social media accessible. They also need to know how to make forms accessible and how to negotiate alternative signatures.
- **Environmental accommodations.** Services need guidelines on creating accessible signage, counter spaces, and elevators.
- **Policies** are required to address communication in emergency evacuation situations, as well as authentic communication assistance in critical contexts, including medical assistance in dying, police, legal and justice settings.

We recommend that the Canadian Accessibility Standards Development Organization (CASDO) establish an advisory committee dedicated to developing specific communication standards that address these areas. This advisory committee should include people or

organizations that represent individuals who have speech, language and communication disabilities; people who are Deaf, deafened and hard of hearing; people who are deafblind, blind or have significant vision loss.

Following the development of generic baseline standards, sector-specific communication standards could be developed. An example of a generic baseline communication standard would be mandatory training for all service providers on how to communicate with a person who has unclear speech or who uses a communication device. An example of a sector-specific communication standard would be that federal courts must provide appropriate and trained communication support services when required by victims, witnesses or accused persons who have disabilities that affect their communication.

#5 - Add Diversity, Equity and Inclusion as a priority theme.

Rationale: This priority theme would set the stage for training on the values and principles of inclusion, dignity, respect, autonomy, non-discrimination practices, human rights and accessibility rights for all government employees across all jurisdictions. These topics should be addressed separately from communication as they apply to all people with disabilities, regardless of their communication support needs.

#16 - The Minister must make every reasonable effort to collaborate with provincial or territorial authorities with a view to coordinating efforts in relation to matters relating to accessibility *including ways to ensure that people have the assistive devices and supports they need in order to access all services across the country, gain employment and participate fully in society.*

Rationale: Without access to the assistive devices people need, such as computers, and speech-generating devices, people with communication disabilities cannot access services and employment opportunities at a local, provincial, territorial or federal level. Many provinces have little or no government funding for communication assistive devices. In addition, many people who have speech and language disabilities require human communication supports and these services are significantly underdeveloped. We see an important role for the Minister in collaborating and working with provincial and territorial governments to ensure that people have the communication services and devices they need to effectively interact with service providers.

New item: Funding is required to increase awareness of communication access rights and develop resources for how to negotiate accessibility requirements for people who have disabilities that affect their communication.

As Glenda Watson Hyatt, a woman who uses a device to communicate, notes: “As a woman with a disability, I was always very aware of my rights to access a building. However, I had

never considered my communication rights. This is an area that we need to know about. We need to know what to expect from an accessible service.”

Communication access rights, for people who have speech and language disabilities, are relatively new. The majority of people who have speech and language disabilities are not aware of having any rights when using services. In addition, they need resources to guide them in communicating about their accessibility needs to a service provider.

We hope that your committee will consider our recommendations. We would be happy to meet with you to discuss any of these issues and / or to present to the committee.

Yours sincerely,



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