



Communication Disabilities Access Canada

Brief for Information and Communications Standard Development Committee

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Thank you for inviting me here today. I want to acknowledge the commitment and good work of this committee. Having been on two ADO committees, I am aware of what it is involved in the process and I think that you have done a commendable job in addressing the responsibilities of businesses and organizations to provide accessible information.

I am here today, to suggest ways to strengthen the standards you have developed in order to reflect the accessibility needs of people who have disabilities that affect their communication, and who are not Deaf or have significant hearing loss. You already have input from people who can better represent the accommodation needs of these groups.

In fifteen minutes, it is impossible to fully describe the barriers, consequences and accessibility needs of people who have speech, language and communication disabilities. My organization, Communication Disabilities Access Canada has focused on these issues for the last twenty years and our research and resources are available on our website.

There are over 165,000 Ontarians who have disabilities that affect their communication. They have diverse physical, neurological, cognitive disabilities that can affect one or more areas of speech, comprehension, retention or remembering, problem-solving, reading and writing. They may have little or no speech and use picture, symbol, letter boards and devices to convey their messages. Examples of disabilities that may affect communication include cerebral palsy, autism spectrum disorder, Down Syndrome, learning disability, fetal alcohol syndrome, cognitive or intellectual disability, acquired or traumatic brain injury, aphasia after a stroke, dementia, head and neck cancer, Amyotrophic Lateral Sclerosis, Parkinson's disease, or Multiple Sclerosis and many other disabilities.

Having a speech, language, communication disability affects every aspect of one's life in face-to-face interactions, telephone communication, group interactions, reading and understanding written information, completing forms, taking notes and signing documents. People who have disabilities that affect their communication can face daily barriers when interacting with all types of service providers, bus drivers, cashiers, servers in coffee shops and restaurants, negotiating their disability supports needs, communicating with wheelchair vendors, healthcare providers, lawyers, police officers.

For them, communication access is as important as physical access is for people who have mobility accommodation needs or people who require accommodations to access information.

At this time, the Information and Communications Standard primarily focuses on making written information (print and digital) accessible. Many of these accessibility accommodations are extremely useful and appropriate for people who have speech and language disabilities.

However, communication access is more than making written information accessible. In order to strengthen the standards for people who have speech, language and communication disabilities,

we are suggesting three recommendations for your consideration. We shared these recommendations and others with Minister Cho, the ADO and this committee in a letter, January 2019. Please note that we do take a generic approach to communication that is not based on specific disability types.

1. Clarify the terms used: Communication(s) or Communication.

In the standards, **Communication** is defined as a two-way interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received. It's a good definition of communication.

However, in the title and throughout the document, the term **Communications** is used. Webster's dictionary defines communications as the discipline that studies the principles of transmitting information and the methods by which it is delivered as in print, radio or television.

These are clearly different entities. If the intent of these standards is to address communication that involves two-way interpersonal communication, we recommend:

- Using the term Communication consistently in title and throughout document.
- Expand the definition to be: Communication is defined in the standards as a two-way interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received in ***face-to-face interactions, over the telephone, online and via reading and writing.***
- Expand the definition of "information" to include data, facts and knowledge that exists in any format, including, but not limited to **speech**, text, audio, digital or images that conveys meaning.

2. Provide detailed information about communication supports.

The standards request that organizations provide communication supports that a person may need. What does that mean? Does it mean giving people an iPad or a device to communicate? Does it mean giving people a communication board in an ambulance? Does it mean giving people a qualified person to assist them communicating in a police interview?

We suggest describing "communication support" for generic, non-critical community service providers, while flagging the need for customized supports in a specific contexts such as police, legal, justice, healthcare and education, where authentic communication is critical.

The ICS could provide the foundation upon which critical services can build.

Our recommendation is:

12. (1) Except as otherwise provided every obligated organization shall upon request arrange for the provision of accessible formats **and as required, provide communication accommodations / supports * for persons with disabilities in face-to-face, group and telephone interactions, reading and writing.**

- (a) in a timely manner that takes into account the person's accessibility needs due to disability; and
- (b) at a cost that is no more than the regular cost charged to other persons.

*Generic accommodations / supports may include but are not limited to: extra time for communication; accepting and interacting with a person using their preferred communication method in face-to-face and telephone interactions; accommodating an authorized communication assistant; protecting a person's privacy when using communication assistance; creating accessible forms and negotiating alternate signature arrangements. In critical contexts, communication accommodations may include much more. For example, in healthcare settings, it might include the provision of communication aids, and access to hospital call bells amongst other things. In police, legal, justice settings, it involves the engagement of a qualified communication intermediary to assist a victim, witness or accused person who has a speech, language and communication disability.

3. Include training on interactive communication

People need information about providing accessible services to people who have disabilities, including people who have disabilities that affect their communication and who communicate in ways other than speech.

Our recommendation is to add a regulation:

Every obligated organization shall provide training to employees on ways to make information accessible for people with disabilities and **how to interact with and provide accommodations in face-to-face, telephone, and written communication.**

We thank you for considering our recommendations. Our recommendations do not provide "how to" information. This information is available in the reference links below.

Respectfully submitted by:



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References

CDAC letter: Minister Cho and Chair of ICS, January 20, 2019 at https://www.cdacanada.com/wp-content/uploads/2019/01/Letter-to-Minister-Cho_2019-Jan-29.pdf

Guidelines for communication access: <https://www.cdacanada.com/wp-content/uploads/2018/12/Guidelines-for-Communication-Access-1.pdf>

Webinar on communication access: <https://courses.cdacanada.com/courses/making-your-services-accessible-for-people-with-communication-disabilities/>