

Sept 9, 2020

The Hon. Carla Qualtrough, MP
Minister of Employment, Workforce Development and Disability Inclusion
Ottawa ON K1A 0A6

Dear Minister Qualtrough,

We were recently asked by Stats Canada and ESDC to review a proposed accessibility module for the 2022 Canadian Survey on Disability (CSD) which is intended to be accessed via the Disability Screen Questions (DSQ). The DSQ identifies 10 different types of disabilities. However, it does not identify Canadians who have speech, language and communication disabilities.

We have been informed by Stats Canada and ESDC that speech, language and communication disabilities will not be included in the DSQ due to (a) space limitations on the survey and the time it takes to complete the survey; (b) “test” questions about speech, language and communication disabilities elicited unreliable interpretations; and (c) comparability with past surveys which also omitted speech, language and communication disabilities. These points are not valid reasons to effectively exclude the needs of 450K Canadians who have speech, language and communication disabilities, and who use or require augmentative communication.

This omission in the DSQ significantly impacts on the meaningful interpretation of the accessibility questions in the CSD because they are not tagged to an identified speech, language and communication disability and do not account for individual’s use, non-use or lack of access to alternative communication methods, communication assistance or the provision or lack of provision of accommodations and supports that an individual may require. For example, questions could explore how a person communicates such as speech; ASL / LSQ; writing; pointing to pictures, symbols and letters; a communication device; support from a familiar person or whether a person has no reliable means of communicating; how well the individual can make themselves understood using their communication methods in face-to-face interactions, communicating over the telephone, at meetings, when reading and understanding written information, using websites and social media, completing forms and signing documents, and whether they experience challenges understanding what people are saying in conversations. There could also be specific questions about access to communication clinical services, device funding, communication assistance and other accommodations.

The omission of Canadians who have speech, language and communication disabilities in this national survey is inconsistent with the Accessible Canada Act, in which communication is recognized as a separate disability and is identified as a priority accessibility area. The characteristics of this population and the barriers they face cannot be extrapolated from the disabilities in the current form of the survey. The only category currently in the survey that would apply would be “Other condition”, which is an inaccurate and non-inclusive representation of the significant needs of this population.

Implications for the omission of this population perpetuates the ongoing serious lack of data required to plan and provide appropriate communication clinical services, communication device funding, accessibility accommodation and supports, as well as policies and procedures for effective communication in critical communication contexts in healthcare, police, legal and justice services.

We strongly recommend that the DSQ and CSD be revised to include questions that are relevant for Canadians with speech, language and communication disabilities. We believe that with appropriate time and input from qualified researchers and practitioners in the area of speech, language disabilities, that survey questions can be framed in ways to elicit accurate and meaningful information about communication disabilities, communication methods and barriers. We would be willing to contribute to these discussions.

We trust that this issue will be addressed in line with the commitment to equitable representation of people with disabilities as expressed in the Accessible Canada Act.

Yours sincerely,



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