

Dec 8, 2021

CDAC Recommendations to Accessible Standards Committee

On Dec 8, CDAC was invited to meet with the Accessible Standards Committee (ASC). The mandate of the ASC is to develop and revise accessibility standards. They do this by setting out how federal private sector organizations and Government of Canada departments and agencies can prevent, identify and remove barriers to accessibility.

In its presentation, CDAC reminded the committee that on Nov 21, 2018, Hon. Carla Qualtrough (Minister of Public Services and Procurement and Accessibility, Lib.) amended Bill 81 to include the priority area of communication. In her address to the House of Commons, she said:

“The current purpose clause was amended to add communication as a priority area. We heard compelling testimony in committee that spoke to the impact of barriers to communication, particularly for persons with communication and language disabilities. This amendment prioritizes the barriers experienced by people with communication and language disabilities that can be caused by conditions such as cerebral palsy, autism spectrum disorder and learning disabilities. By making communication a priority in and of itself, we can guarantee a consistent, harmonized approach to addressing the barriers to accessibility faced by people with communication disabilities in every federally regulated sector.”

Krystine Donato, CDAC board member, expressed her concerns about the lack of focus on communication access. She attributes this to the fact that there is currently no formal input mechanism for people who, like her have disabilities that affect their communication. She urged the ASC to engage people who have communication disabilities and their representative organizations as essential partners in the roll out of the Accessible Canada Act.

Barbara Collier, Executive Director of CDAC, gave an overview of communication disabilities, how these disabilities can impact on one or more areas of comprehension, memory, decision-making, expressive communication, reading and/or writing and implications for accessibility in face-to-face interactions, telephone services, meetings, conferences, online learning, accessing written information, note taking, signing documents and completing forms.

Specifically, CDAC recommended that the ASC:

1. Adopt clear, inclusive and consistent definitions of communication and communication access, and ensure these are understood and used by all federal entities.
2. Address communication access as a domain that applies to all people with disabilities that affect communication and that occurs within all service entities and employment situations.
3. Establish a dedicated technical committee to develop generic communication standards that can be customized on an individual basis and that includes input from persons with lived experience AND communication disability professionals.
4. Augment generic service standards and regulations for critical communication services such as justice, public safety, public health, emergency, and pandemics.

CDAC shared sample standards and guideline resources for key communication accessibility areas. These included:

- Provide spoken information in a manner that the person understands.
- Use evidence-based practices for effective expressive communication with people in face-to-face interactions; at meetings and public consultations.
- Implement specific policies, practices and safeguards to ensure authentic communication in critical contexts such as police, legal, justice, healthcare services, consent and capacity adjudications and medical assistance in dying where qualified, impartial communication support may be required.
- Ensure accessible communication in telephone and video internet services.
- Provide written information in a manner that the person can read, understand and can use.
- Train service providers in communication access relevant to their position responsibilities.