



POLICY PAPER

Student Accessibility & Disability Inclusion

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ABOUT OUSA

OUSA represents the interests of 150,000 professional and undergraduate, full-time and part-time university students at eight student associations across Ontario. Our vision is for an accessible, affordable, accountable, and high quality post-secondary education in Ontario. To achieve this vision we've come together to develop solutions to challenges facing higher education, build broad consensus for our policy options, and lobby government to implement them.

The member institutions and home office of the Ontario Undergraduate Student Alliance operate on the ancestral and traditional territories of the Attawandaron (Neutral), Haudenosaunee, Huron-Wendat, Leni-Lunaape, Anishnawbek, and Mississauga peoples.

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EXECUTIVE SUMMARY

OUSA believes that all willing and qualified students should have access to affordable, accountable, and high quality education in Ontario. This extends to all students, including those with disabilities or perceived disabilities. However, students with disabilities continue to face barriers to accessing and persisting in post-secondary education and many of the barriers these students face are not new.

THE PROBLEM

Isolating Campus Environments

Campus environments play a critical role in accessible education, but students are concerned about both social and physical barriers they face. Specifically, students are concerned about the lack of training required to educate students leaders, staff, and faculty in accessibility and inclusion:

- There are no provincial requirements in place mandating training on creating accessible campus environments for student leaders in volunteer positions;
- Instructors and teaching assistants are often not trained on how to provide accommodations to students with disabilities or on navigating support services;
- There is no mandate for accessibility training for instructors, staff, and teaching assistants; and
- Existing training modules are not required to include information on the accommodation rights.

Students are also concerned about the physical barriers that continue to make university campuses unnavigable for many students, particularly those with functional limitations:

- Students with disabilities have a difficult time accessing parking on university campuses as not all parking lots on university campuses have designated accessible parking spots;
- Older buildings on university campuses are not wholly accessible;
- Accessibility ramps are often difficult to access;
- Many lecture halls only have reserved accessible seating at the back of the room; and
- There are a limited number of barrier-free/universal washrooms on campuses and existing ones are often farther away from general spaces and difficult to access.

Barriers to Transition

Another important component of post-secondary education are the transitions into and out of university. These transitions play a significant role in student success and their ability to contribute to the workforce. However, students are concerned that information on all disability services and documentation requirements are not effectively communicated. For example, students are often unaware of the requirements for psychosocial assessments. Without effective transition information, students who develop a disability during their post-secondary education may not identify that they could qualify for accommodations. Yet, the information provided in summer transition programming is inconsistent, as generalized summer transition programs insufficiently inform on accessibility services and supports. Additionally, students may not attend transition programs and therefore miss out on this information.

As they prepare to transition from post-secondary into the workforce, students are concerned that those with disabilities do not have sufficient opportunities to build their career-related experience. This is, in part, due to functional limitations but is also a result of social barriers and stigma:

- Students may choose to work in a part-time position where they are sure their accommodation needs will be met rather than choosing to start a new full-time position;
- There is limited knowledge of how, when, or if to disclose a disability to a potential employer; and
- Students with visible disabilities face barriers to acquiring a job earlier on in the process.

Ineffective Support Services

While studying, students require a range of support services, and students with disabilities often face barriers to accessing effective support services. Students are specifically concerned that faculty and staff

may not be equipped with the proper training to support academic accommodations. They are further concerned about the variability in documentation requirements between institutions which can limit students from accessing their choice of institution. Centralized bodies like the Inter-university Disability Issues Association (IDIA) do not have sufficient resources to research new models for accessibility.

Students are also concerned about some of the structures that guide support services. They are concerned that not every institution holds an independent review process for appeals for accommodations. They are concerned about the limitations of the Ontario Human Rights Commission's (OHRC) definition of disability. Students are concerned that mental health services may not take into account the unique lived experiences and functional limitations of students with disabilities, and that these services are not always easily accessible to persons with disabilities.

Students are also concerned about the financial costs of support services, recognizing that post-secondary institutions may not have sufficient funds available for assistive technologies and that they are often expensive for individual students. Additionally, students registered with accessibility offices who are pursuing certificates rather than degrees receive accommodations but are not considered when the Ministry of Colleges and Universities (MCU) determines funding for accessibility offices.

Barriers to Academic Accommodations

While students are asking for accessible post-secondary education, there will be cases where accommodations will still be required. However, students are concerned about the barriers to receiving accommodations. For example, students may be denied access to accommodations due to faculties' concerns about protecting intellectual property. Students are concerned that post-secondary accessibility policies lack a consistent review process, that accommodation policies and their implementation vary across institutions, and that province-wide documentation standards in the area of mental health are not reviewed in an adequate and timely manner.

Students are concerned about the standards surrounding the resubmission of disability documentation. Students who have unique circumstances often experience additional barriers when accessing documentation requirements, on top of the fact that institutions may not recognize or understand all disabilities and therefore may not be equipped to provide the necessary academic accommodations. Students with disabilities have a greater chance of facing intense academic strain which may be further compounded by them having to navigate the administrative process, especially when they are not provided with necessary and/or proper information. Students often experience hurdles when seeking access to the academic accommodations and these barriers create delays which can severely hinder a student's ability to succeed.

Financial Barriers

Students with disabilities also face financial barriers that are unique to their experiences. For example, there are high costs associated with acquiring psychological assessments. Students are concerned that a disproportionate number of students living with a disability borrow from private lenders.

Ineffective Legislation

Finally, while the province currently has accessibility legislation, namely the *Accessibility for Ontarians with Disabilities Act* (AODA), this legislation has not effectively changed the accessibility for post-secondary education in Ontario. In fact, less than half of organizations in Ontario are AODA-compliant and students are concerned that many buildings continue to be inaccessible.

RECOMMENDATIONS

To address these concerns, students representing OUSA's membership have come together to propose the following recommendations that the provincial government should adopt in support of an accessible post-secondary education for all students in Ontario.

Improving Campus Environments

In order to ensure students are not faced with social barriers and stigma on campus, MCU should task the Higher Education Quality Council of Ontario (HEQCO) with developing a comprehensive Accessible Education Training best practices guideline and should partner with the Council of Ontario Universities (COU) and the Ontario Confederation of University Faculty Associations (OCUFA) to develop a set of modules for faculty on disability accommodations and accessibility. The provincial government should work with OCUFA to ensure they provide their members with standardized training and best practices, and amend the Occupational Health and Safety Act to include that all volunteer positions that will interact with individuals with a disability be required to complete AODA training

To address physical barriers on campuses, the provincial government should:

- allocate capital funds to universities to create accessible parking spots on campus;
- amend section 80.33 of the AODA to require post-secondary institutions with multiple off-street parking facilities to evenly distribute accessible parking spaces on campus;
- provide envelope funding to institutions to retrofit existing infrastructure to comply with and go beyond AODA standards;
- provide envelope funding to universities' deferred maintenance budgets for the implementation of repairs and enhancements to campus pathways, classrooms, and buildings; and
- provide institutions with envelope funding to increase the number of barrier-free/universal washrooms on university campuses.

The MCU can support in this goal by:

- mandating that institutions have accessibility information on their website;
- encouraging post-secondary institutions, when undergoing renovations or building new infrastructure on campus, to go above and beyond AODA standards; and
- encouraging institutions to ensure that washrooms are in an accessible location.

Supporting Transitions

The provincial government also has a role to play in supporting students as they transition into and out of post-secondary education. Students believe that the Ministry of Education and MCU should work together to amend the secondary school curriculum to provide high school students with knowledge of assessment and documentation requirements and that some demanding programs can still be accommodated at the post-secondary level. MCU should also help students navigate the process of getting medically recognized and emphasize the value of interim documentation of functional limitations. The provincial government should require general summer transition programs supported by government funding to integrate information on accessibility services and accommodation for all students. MCU should further mandate that all universities make specific transition services available for incoming students with disabilities.

To support students as they transition into employment, the provincial government should:

- task HEQCO with researching best practices for transition programs for students with disabilities;
- expand Employment Ontario by adding combined disability youth incentives and support;
- provide funding to institutions for the training of an existing career consultant or a career consultant specifically dedicated to supporting students with disabilities; and
- make work integrated learning opportunities available for students with disabilities.

Strengthening Support Services

Students are also asking for stronger and more effective support services on their campuses. The provincial government can support this ask by providing funding to the IDIA to conduct research on standards of practice providing supports to students with disabilities and working with the IDIA to develop standard documentation for admissions applications. Further, MCU should task the HEQCO with creating a standard to evaluate the effectiveness of accessibility services at post-secondary institutions as

well as for the appropriate amount of funding for accessibility offices. This would be strengthened by a mandate that institutions have an independent body to review complaints about accessibility services and a formal definition from the OHRC that describes individuals with functional limitations that are expected to persist, but not necessarily for their whole life. Additionally, the Ministry of Health and Long-Term Care should develop best practices for a “whole of community approach”.

To address financial barriers to providing effective support services, the provincial government should provide additional envelope funding through the Accessibility Fund for Students with Disabilities to secure assistive technologies for students and additional accessibility support services, as well as funding for institutions to cover the costs of assistive technologies on behalf of students. Additionally, MCU should include the total number of students when calculating how much funding accessibility offices receive.

Improving Academic Accommodations

The requirements and processes to receive academic accommodations can be extremely burdensome for many students with disabilities. To alleviate some of these barriers, students ask the provincial government to mandate that universities review their academic accommodations policy every five years. The provincial government can support this by conducting a review of existing academic accommodation standards. At the same time, the provincial government should task HEQCO with conducting:

- a review of province-wide documentation standards in the area of mental health;
- a review of the current standards on disability documentation resubmission;
- a review of the assessment requirements for students seeking academic accommodations based on a learning disability and/or ADHD; and
- an investigation into best practices in academic accommodation processes.

To ensure students see the full benefits of these reviews, the provincial government should mandate that the standards and guidelines for province-wide documentation are being enforced equitably across all institutions; that accessibility services utilize the best practices provided by HEQCO in the training of instructors and staff; that universities' accommodation policies are aligned with the OHRC's *Policy on accessible education for students with disabilities*; and that a standardized interim accommodation process be implemented. Students also believe that province-wide documentation standards should not require students with registered permanent disabilities to seek additional forms of documentation and the Ontario Health Insurance Program should be expanded to include the cost of medical notes.

Addressing Financial Barriers

The provincial government should also address the financial barriers that prevent students with disabilities from accessing post-secondary education. To this end, the OHRC should create a formal definition for temporary disabilities that the MCU should adopt. The provincial government should lobby the federal government to expand the eligibility criteria to include students with temporary disabilities and to expand the diagnostic assessment limitation under the Canada Student Grant for Persons with Disabilities to cover the costs of psychological assessments in their entirety.

The Ontario Student Assistance Program (OSAP) also requires improvements. Specifically, eligibility requirements should be amended to ensure that students who have a temporary disability, who are taking a reduced course load, are still eligible for full-time OSAP funding; reviewed to ensure that the regulations adopt an Equity, Diversity, and Inclusion lens; and OSAP academic probation and restriction penalties should take into account the functional limitations and lived experience of students with a disability.

Strengthening Accessibility Legislation

Finally, the provincial government can strengthen their commitment to accessibility in the province by conducting a review of AODA compliance and strengthen future iterations using a phased approach; and reassessing the AODA and creating an updated document as to where organizations should be moving towards within the next 20 years. In the meantime, they should work with post-secondary institutions to ensure that all existing and future buildings are compliant with the AODA and the Building Code Act.

BACKGROUND

Persons with disabilities face distinct challenges that need to be addressed. These challenges may include the inability to access certain environments, financial barriers due to accessibility needs, difficulty processing external stimuli, or disability-based discrimination. Institutions should take measures to eliminate these barriers for current and prospective students. Having a disability should not impede an individual's ability to access post-secondary education in Ontario. The *Ontario Human Rights Code* (Code) protects individuals from being discriminated against based on protected grounds, including having a disability. The Ontario Human Rights Commission's (OHRC) *Policy on accessible education for students with disabilities* more specifically states that post-secondary students at public and private institutions are guaranteed "the right to equal treatment in education, without discrimination on the ground of disability."¹

In order to ensure compliance with the Code, and more importantly, to ensure students with disabilities are treated with dignity, post-secondary institutions must take every reasonable step to create an accessible environment for all students. Post-secondary institutions must ensure that their facilities and services are accessible, that appropriate, effective and dignified accommodation processes are in place, and that students who require accommodations because of their disabilities are accommodated up to the point of undue hardship. Under the *Accessibility for Ontarians with Disabilities Act* (AODA), post-secondary institutions are also required to complete an accessibility plan.² Educators at the post-secondary level are responsible for participating in the accommodation process (including the provision of specific accommodations), being knowledgeable about and sensitive to disability issues, and maintaining student confidentiality.

The purpose of this policy paper is to provide recommendations for the provincial government to support post-secondary institutions meet the needs of all students to ensure that students with disabilities are able to access the same quality of education as their peers. It was written with input from students with disabilities and administrators of disability services across Ontario. Their feedback, along with research on evidence-based best practices informed the substantive recommendations to improve post-secondary accessibility and inclusion for all students found herein.

DEFINING AND UNDERSTANDING DISABILITY

Historically, the term "disability" has been narrowly defined as a physical impairment that limits one's mobility or physical capacity. Today, it is recognized that disabilities come in many different forms – physical or mental – and are not always visible. Under the Code, a disability is "any degree of physical disability... a condition of mental impairment or a developmental disability... a learning disability... a mental disorder... or an injury or disability for which benefits were claimed."³ The Code includes anticipated disabilities in its definition, signalling the need to take proactive measures to accommodate students who may develop a disability. This paper uses the Code definition of disability.

There are different models used to describe disabilities. The *medical model* is primarily concerned with biological impairments and suggests that individuals with disabilities require treatment. According to this model, the individual with the disability is responsible for ensuring they have equal access to resources. For instance, a student with a visual impairment in a lecture hall would be responsible for requesting that the professor use visual aids with larger fonts or easier-to-read graphics. In this case, the student bears the responsibility to seek relief from the situation. This practice can result in structures that "isolate or withdraw students from mainstream classrooms via specialist units staffed by expert educators."⁴

¹ Ontario Human Rights Commission, *Policy for Accessible Education for Students with Disabilities* (Ontario Human Rights Commission, March 2018) [OHRC, *Policy for Accessible Education*].

² *Accessibility for Ontarians with Disabilities Act* 2005, c. 11. <https://www.ontario.ca/laws/statute/05a11> [AODA]

³ Ontario Human Rights Commission, *Policy on ableism and discrimination based on disability* (Ontario Human Rights Commission, June 2016) [OHRC, *Policy on Ableism*].

⁴ Alison S. Gable, "Disability theorising and real-world education practice: A framework for understanding," *Disability & Society* 29, no. 1 (2014): 86-100 [Gable].

Rather than viewing disabilities as solely an individual's problem, institutions should adopt the model used by the OHRC, the *social model* of disability. The social model posits that disability is a construct and places the onus on society to create an environment in which everyone can participate. There is a collective responsibility to ensure that there is equal access for all individuals. In the case of the student with a visual impairment, professors would be responsible for creating a more accessible classroom and may choose to provide lecture slide decks ahead of time or prepare alternate visual aids for students with disabilities. Adopting the social model encourages institutions to be inclusive of all staff, faculty, and students. This is a necessary approach to support accessible post-secondary education in the province.

PRINCIPLES OF ACCOMMODATION AND ACCESSIBILITY

Post-secondary institutions must promote both accommodation and accessibility in order to support the inclusion of all students who have or may develop a disability. Although accommodations and accessibility are often conflated, they have different meanings in the context of ensuring equal access for students with disabilities.

Accessibility refers to systemic or structural changes to the environment or services that minimize barriers and create equal access to post-secondary education for all students. For instance, installing a ramp at the entrance of a building is an accessible measure to allow for equal access to the learning environment. Under the AODA, post-secondary institutions are required to create accessible environments for students.

Accommodations are those changes made on an individual basis to ensure a student with a disability has the same level of access as that afforded students without disabilities. An example of an accommodation would be ensuring a student is given any required assistive devices that support their ability to access the learning environment. The OHRC refers to accommodations as a continuum, and under the Code service providers have a duty to accommodate wherein they must achieve the highest point on that continuum, short of "undue hardship".⁵

While accommodations are necessary to provide equal access, it is important to make long-term accessibility changes so that the environment and services are available to everyone. Institutions should not be providing individual accommodations in lieu of creating systemic change, but rather accommodations should be provided in addition to accessible education where required on an individual basis.

UNIVERSAL DESIGN FOR LEARNING

Universal Design for Learning (UDL) is a pedagogical model that recognizes the need to create a learning style that is accessible to as many individuals as possible. Traditional models of learning may inadvertently create barriers for students with disabilities, whereas UDL "challenges the instructor... to proactively design an accessible course and integrate practice so that other students benefit as well."⁶

UDL principles reduce the need for additional accommodations, such as student note takers, and improve student engagement and self-sufficiency.⁷

The provincial government should encourage institutions to adopt the social model of disability and UDL principles to create accessible environments for all students. Incorporating UDL is an essential first step to creating accessible environments for students with disabilities. The government should support

⁵ OHRC, *Policy on Ableism*, n 3.

⁶ Michael Condra and Eleanor Condra, *Recommendations for Documentation Standards and Guidelines for Academic Accommodations for Post-Secondary Students in Ontario with Mental Health Disabilities* (Kingston: Queen's University, 2015) [Condra & Condra].

⁷ Amy Lightfoot, Roya Janemi, & Debbie Laliberte Rudman, "Perspectives of North American Postsecondary Students with Learning Disabilities: A Scoping Review," *Journal of Postsecondary Education and Disability* 31, no. 1 (2018): 57-74 [Lightfoot, Janemi, & Rudman].

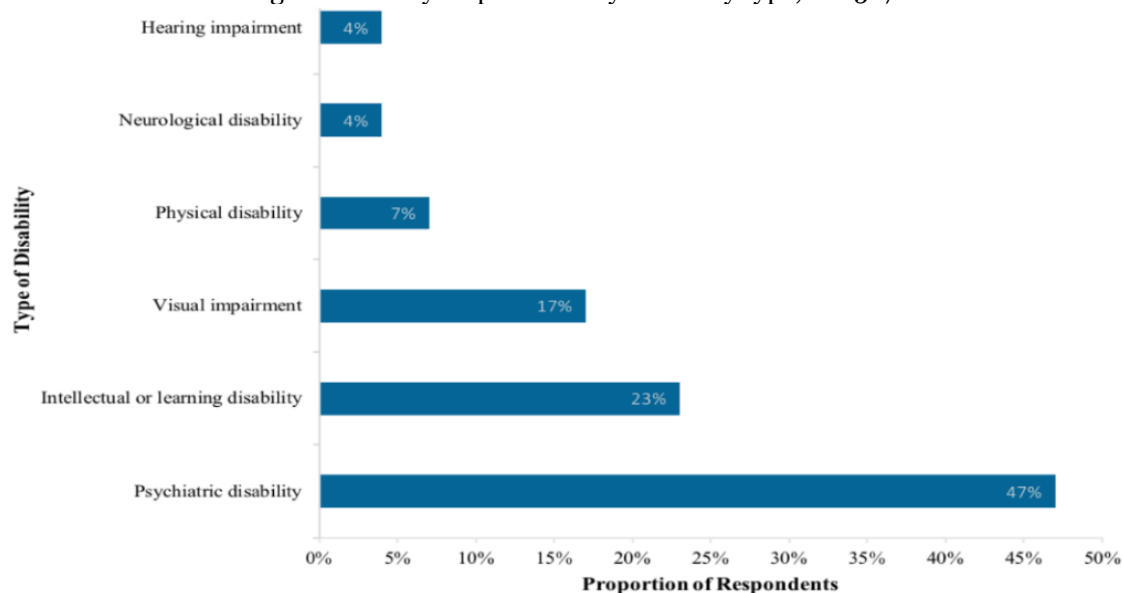
institutions to adopt UDL principles and operate under the social model in order to ensure compliance with the Code. Doing so will allow faculty and staff at post-secondary institutions to meet the needs of their students.

PREVALENCE OF DISABILITY TYPES

According to the 2017 Ontario Post-Secondary Student Survey (OPSSS) which surveyed students from across OUSA's eight member institutions, 19 percent of respondents reported having some form of disability.⁸ Of the respondents who reported having a disability, 47 percent indicated having a psychiatric disability, 23 percent indicated having an intellectual or learning disability, and 17 percent indicated some form of visual impairment (see Figure 1, below).

Exact data on the number of Ontario post-secondary students with disabilities is difficult to capture, however according to a July 2018 report by the National Educational Association of Disabled Students (NEADS), 190,000 Canadians with a disability 15 years or over were attending a post-secondary institution.⁹ These numbers, while not illustrative of all experiences of disability, indicate the prevalence of disability amongst post-secondary students, as well as the range of disabilities that students across the province experience.

Figure 1: Survey respondents by disability type, n = 567.



ABLEISM

It is also important to preface any discussion on addressing barriers for students with disabilities with a discussion on ableism. Ableism is defined by the Ontario Human Rights Commission as “attitudes in society that devalue and limit the potential of persons with disabilities”¹⁰ and identified by the Law Commission of Ontario as “embedded in institutions, systems or the broader culture of a society.”¹¹ It is necessary to recognize that although this policy paper offers recommendations to create a more accessible post-secondary landscape for students with disabilities in the province, unless we are attentive to the ways

⁸ Britney De Costa & Martyna Siekanowicz, *Accessibility: Results from the 2017 Ontario Post-Secondary Student Survey*, Research Report (Toronto, ON: Ontario Undergraduate Student Alliance, 2019) [OUSA, *Accessibility Report*].

⁹ CERIC Blog; “Post-Secondary Students with Disabilities face Gaps in Career Education Services,” blog entry by the National Educational Association of Disabled Students, May 10, 2019, online: <https://ceric.ca/2019/05/post-secondary-students-with-disabilities-face-gaps-in-career-education-services/> [CERIC Blog, “Gaps in Career Education”].

¹⁰ OHRC, *Policy on Ableism*, n 3.

¹¹ Ibid.

in which ableism permeates our individual interactions as well as our institutional policies, there will continue to be barriers for the full participation of students with disabilities. Ableism can lead to discrimination, whether direct or indirect, and it is therefore not only important from a social good perspective to acknowledge and correct ableist policies, attitudes, and practices, but it is also a legal obligation that institutions have under the Ontario Human Rights Code.¹²

The following recommendations – written by students and based on existing research and consultations with students, staff, and administrators from OUSA’s eight member schools – are intended to provide the provincial government with guidance to create a post-secondary landscape that is accessible to all students and avoids discrimination that results from ableism and ableist policies.

¹² Ibid.

INTRODUCTION

OUSA believes that all willing and qualified students should have access to affordable, accountable, and high quality education in Ontario. This extends to all students, including those with disabilities or perceived disabilities. However, students with disabilities continue to face barriers to accessing and persisting in post-secondary education across the province, and many of the barriers these students face are not new.

This policy paper identifies these barriers and offers recommendations to the provincial government to support a post-secondary landscape that is accessible for all students. The recommendations are intended to address the systemic, structural, social, physical, financial, and legislative barriers that students with disabilities are forced to navigate in their pursuit of post-secondary education. Each section speaks to an area of concern identified by disability scholars, organizers, support providers, and, most importantly, students themselves.

Beginning with campus environments and concluding with the Accessibility for Ontarians with Disabilities Act, each part of this policy paper is approached from the social model of disability that posits that disability is a construct and places the onus on society to create an environment in which everyone can participate. This requires a commitment to accessibility and making systemic or structural changes to the environment or services that minimize barriers and create equal access to post-secondary education for all students.

To this end, the recommendations proposed in this policy paper focus on improving the campus environment by looking at both social and physical barriers. The social barriers are addressed through training proposals, and recommendations to address physical barriers such as those related to parking, washrooms, and campus infrastructure more broadly, are offered. Transitions into and out of post-secondary are explored and proposals are made to improve the transition process for students with disabilities. Recommendations are also made to improve support services and academic accommodation processes to address instances where full accessibility is not possible. In these cases, some students may need additional support that should be provided to create a more equitable experience. Finally, financial barriers are addressed, and proposals to improve provincial accessibility legislation are made.

Everyone has a role to play in creating accessible campuses that support all students to thrive. However, it is particularly important that the provincial government provide institutions with the necessary guidance and support so that they can create positive and welcoming environments for their students. Research, guidelines, training, and funding are all needed to address the broad range of barriers that prevent students with disabilities from participating fully in post-secondary education.

This policy paper was written to reflect the desire students have to live and learn on campuses that are accessible and inclusive of all students. It was developed and written by student leaders, in consultations with students at their respective institutions who identified as having a disability, as well as accessibility support service providers. The following principles, concerns, and recommendations illustrate the current status of accessibility on Ontario campuses and offer a roadmap to dismantle persistent barriers that prevent all students from accessing an affordable, accountable, and high quality education.

INCLUSIVE CAMPUS ENVIRONMENTS

TRAINING

Principle: Student leaders, teaching assistants, instructors and staff should be provided with the knowledge and resources needed to make their campus environment accessible for all students.

Concern: As student leaders are often volunteer positions (i.e., not paid staff), there are no provincial requirements in place mandating training on creating accessible campus environments.

Concern: Instructors and teaching assistants are often not trained on how to provide accommodations to students with disabilities.

Concern: There is currently no provincial mandate governing accessibility training for instructors, staff, and teaching assistants.

Concern: Existing training modules are not required to include information on the accommodation rights that students have on campus.

Concern: Instructors and staff are not always provided adequate training to help students navigate the support services at their university.

Recommendation: The Ministry of Colleges and Universities should task the Higher Education Quality Council of Ontario (HEQCO) to develop a comprehensive Accessible Education Training best practices guideline for all faculty, front line staff, and student leaders to help remove barriers for teaching and learning for students with disabilities.

Recommendation: The provincial government should amend the Occupational Health and Safety Act to include that all volunteer positions that will interact with individuals with a disability be required to complete Accessibility for Ontarians with Disabilities Act (AODA) training.

Recommendation: The Ministry of Colleges and Universities should partner with The Council of Ontario Universities (COU) and the Ontario Confederation of University Faculty Associations (OCUFA) to develop a set of modules for faculty on disability accommodations and ways to incorporate universal design for teaching and learning into their classrooms.

Recommendation: The provincial government should work with OCUFA to ensure they provide their members with standardized training and best practices based on regularly updated research for accommodating students with disabilities.

Having access to a comprehensive training model, with a focus on universal design for learning, is essential to ensuring all students have the ability to succeed within their classroom environment. As it stands, accessibility training given to faculty, instructors, teaching assistants, and front-line staff is not mandatory or standardized across universities. Regardless of any agreements between departments and staff, faculty should have access to adequate resources to make their classroom and course content accessible for all students. In administering training, a barrier many schools face is the cost associated with providing it to hundreds of staff, teaching assistants, instructors, and faculty. Whether it be creating online modules or meeting physically with groups of people, many institutions do not have sufficient resources to do so. The labour that goes into developing, disseminating and administering training is time consuming and can be a barrier for faculty and staff wanting to better support their students.

Many faculty and instructors are willing and have the desire to make their courses wholly accessible for all their students, but without comprehensive training may not know where to start. Staff at McMaster University recently released a comprehensive e-book on Accessible Education Training. This guidebook has been created in a way that makes the participant active in the learning process. The text goes through foundations on accessibility, accessible education modules on universal/course design, student

engagement modules on navigating discussions and social barriers, and assessments modules to ensure assessments are barrier-free for staff and students.¹³ One avenue to strengthen training given to staff, instructors, teaching assistants, and faculty is to task the Higher Education Quality Council of Ontario with developing a training framework that is applicable to all Ontario universities. An important aspect of this training should be the specific accommodation rights that students have on their campuses. Often times training discusses how best to support students and ways to approach accessible education but lacks information on the accommodation rights of students on campus. The availability of comprehensive, accessible education training ensures that faculty, instructors, teaching assistants, and staff have access to a well-researched set of guidelines on how best to support their students and make course content accessible for all, even in cases where an institution chooses to not make this training mandatory.

In order to improve faculty members' ability to support academic accommodations, the provincial government should work with the Council of Ontario Universities (COU) and the Ontario Confederation of Faculty Associations (OCUFA) to develop a set of modules that educate faculty on accommodations and UDL principles for teaching and learning. Further understanding of Universal Design for Learning (UDL) principles will enable faculty members to develop accessible course material for all students, which is preferable to creating individual accommodations for each student due to inaccessible course materials.

A lack of formal training results in faculty members feeling "left in the dark" on how to properly support students through the accommodation process.¹⁴ Formal training from OCUFA, developed by disability theorists and educators, will empower faculty members to understand the value of accommodations and how to create accessible courses. The provincial government should therefore support OCUFA to deliver to ensure faculty have access to standardized training and regularly updated best practice research. The training should include a focus on UDL principles, as well as explanations for accommodations as a means to create equity in the classroom. Information on standardized or institution specific documentation requirements would also limit the confusion about when and why students require accommodations.

In addition to training for faculty, instructors, teaching assistants, and staff, student leaders who act in volunteer positions and therefore do not fall under the umbrella of being considered "staff", should also be required to undergo training to support accessibility at their institutions. These student leaders interact with students in their duties and therefore have a role to play in creating an accessible campus environment. One way to ensure that these student leaders are adequately trained is to amend the *Occupational Health and Safety Act* to include that all volunteer positions where a person will, or has the potential to, interact with students with disabilities, be required to complete training on the *Accessibility for Ontarians with Disabilities Act* and obligations for accessible campus environments.

PARKING

Principle: Students with a disability should not have to go out of their way to find an available parking space on campus.

Principle: Students with a disability should be given the resources to alleviate barriers in traveling to, from, and around campus.

Concern: Students with disabilities have a difficult time accessing parking on university campuses.

Concern: Not all parking lots on university campuses have designated accessible parking spots.

Recommendation: The provincial government should allocate capital funds to universities who are

¹³ Alise de Bie and Kate Brown. *Forward with Flexibility; A Teaching and Learning Resource on Accessibility and Inclusion* (Hamilton, Ontario: McMaster University, 2017), online: <https://flexforward.pressbooks.com/> [de Bie & Brown].

¹⁴ Sarah Copfer Terreberry, "Understanding Student and Faculty Perceptions of Accommodation and Support Procedures for Students with LD in Ontario Universities: A Mixed Methods Approach," PhD diss., (Western University, 2017), pp. 148-149, online: <https://ir.lib.uwo.ca/etd/5024/> [Terreberry].

specifically looking to modify existing or create new accessible parking spots on campus.

Recommendation: The provincial government should amend section 80.33 of the Accessibility for Ontarians with Disabilities Act to require post-secondary institutions with multiple off-street parking facilities to evenly distribute accessible parking spaces on campus, taking into account the utilization of the buildings the parking lots are in close proximity to.

The process to acquire a parking space on campus can be a long and financially strenuous process for any student, but when compounded with a disability the barriers increase significantly. Consultations with students at OUSA's member schools revealed that students who require accessible parking spaces face barriers, as not all parking lots on their campuses will have accessible spaces. This can prevent students from accessing classrooms or other campus spaces that they need to succeed.

According to the Accessibility for Ontarians with Disabilities Act (AODA), institutions are required to have the following accessible parking spaces for persons with disabilities:

Institutions with 101-200 parking spaces must have one accessible parking space for persons with disabilities and an additional three percent of total parking spaces reserved for those with a disability.

Institutions with 201-1000 parking spaces must have two accessible parking space for persons with disabilities and an additional two percent of total parking spaces reserved for those with a disability.

Institutions with more than 1000 parking spaces must have eleven accessible parking space for persons with disabilities and an additional one percent of total parking spaces reserved for those with a disability.¹⁵

The current regulations do not specify any requirements as to how accessible parking spaces should be distributed where an institution has multiple parking lots. This means that there may be parking lots on campus that have accessible parking spaces and other parking lots without any accessible parking spaces. The provincial government can address this gap by amending the AODA to include an accessible parking space distribution guideline to ensure every parking lot includes the appropriate amount of accessible parking spaces based on size and number of persons who require access to nearby buildings.

Institutions that need to make changes to their existing distribution of accessible parking spaces, or who are required to increase the number of accessible parking spaces on their campus will face costs as they restructure existing parking lots, painting new lines, and ensuring accessibility needs are met. To support institutions in their efforts to improve parking accessibility and provide all students with the opportunity to access campus spaces, the provincial government should set aside capital funds for institutions to make any necessary changes. As each institution will require different levels of change based on the accessibility of their existing campus parking infrastructure, these funds should be available to institutions through an application, on an as needed basis.

CAMPUS INFRASTRUCTURE AND BUILT ENVIRONMENT

Principle: University campus infrastructure should be accessible for all students.

Principle: Students with disabilities should be able to navigate campus easily.

Principle: Information on the accessibility of classrooms and buildings should be transparent and

¹⁵ Ministry of Community and Social Services, *A Guide to the Integrated Accessibility Standards Regulation* (Toronto: Queen's Printer for Ontario, 2014), online: <https://docs.ontario.ca/documents/4845/guidelines-to-iasr-english.pdf> [Guide to the Integrated Accessibility Standards Regulation].

available online to students.

Concern: Older buildings on university campuses are not wholly accessible.

Concern: Accessibility ramps are often difficult to access, which makes navigating buildings and traversing campus in a timely manner difficult for students with a mobility device.

Concern: Many lecture halls only have reserved accessible seating at the back of the room, which can cause additional barriers for students who also have intersecting disabilities, such as students with mobility issues who also have a learning disability, vision or hearing impairment.

Recommendation: The provincial government should provide envelope funding to institutions to retrofit existing, and encourage the redesign of older, infrastructure to comply with and go beyond Accessibility for Ontarians with Disabilities Act (AODA) standards.

Recommendation: The Ministry of Colleges and Universities should mandate that every post-secondary institution have information on the accessibility of every building and classroom on campus on their website, that is easy to find and transparent for students.

Recommendation: The provincial government should provide envelope funding to universities' deferred maintenance budgets for the implementation of repairs and enhancements to campus pathways, classrooms, and buildings that specifically work to increase the overall accessibility of campus for students with disabilities.

Recommendation: The Ministry of Colleges and Universities should encourage post-secondary institutions, when undergoing renovations or building new infrastructure on campus, to go above and beyond AODA standards to ensure they are accommodating for the diverse needs of students with a disability.

Post-secondary institutions should be an inclusive environment for all students. However, physical barriers make it difficult for many students to both access and thrive on their campuses. Many older buildings on university campuses have considerable physical barriers and often lack the necessary accessibility features that allow for all students to enter or navigate, including elevators or accessible ramps. Even buildings that do have accessible entrances available are not designed to create an equitable environment for students with disabilities. For example, accessible ramps, and at times large elevators, are often found at the back or sides of buildings. This increases the overall time that a student with a disability has to move around campus. Another example is in lecture halls where accessible seating is located at the back of classrooms. This creates additional barriers for students who require accessible seating and also have a learning disability or visual or hearing impairment that makes it difficult for them to learn from the back of the class.

While there is legislation in place that requires institutions to create physically accessible spaces for students with disabilities, namely the *Accessibility for Ontarians with Disabilities Act* (AODA), compliance with accessibility standards can be costly. The provincial government can support institutions to improve the physical accessibility of their campuses by providing envelope funding to retrofit existing, and encourage the redesign of older, infrastructure to comply with AODA standards. However, as the AODA provides minimum standards for accessibility the Ministry of Colleges and Universities should encourage institutions, in doing so, to go above and beyond AODA standards which will support students and account for any physical barriers that may not be identified in the AODA.

Students with physical disabilities can also encounter barriers to navigating their campus in situations where roads are uneven, or accessible technology, such as assistive door-opening buttons or classroom learning technology, is broken. To ensure that all students are given the same opportunities to access classrooms and campus spaces, the provincial government should provide envelope funding to universities' deferred maintenance budgets for the implementation of repairs and enhancements to

campus pathways, classrooms, and buildings that specifically serve to increase the overall accessibility of campus for students with disabilities.

Finally, as post-secondary institutions work towards creating fully-accessible campuses, they should provide information to all students on the accessibility of classrooms and buildings so that students with accessibility needs are informed on existing barriers. This will support students to better navigate campus and identify when and where they may need to access support or assistance. The Ministry of Colleges and Universities can support students by mandating that institutions include this information on their websites in a way that is easy to find and transparent.

WASHROOMS

Principle: All students should have access to washrooms on campus that meet their needs.

Concern: There are a limited number of barrier-free/universal washrooms on university campuses.

Concern: The location of barrier-free/universal washrooms are often farther away from general spaces and difficult to access.

Recommendation: The provincial government should provide institutions with envelope funding to increase the number of barrier-free/universal washrooms on university campuses.

Recommendation: The Ministry of Colleges and Universities should encourage institutions to ensure that when new buildings are being created washrooms are in an accessible location with clear signage so students are informed on where to go.

All students, regardless of one's gender, sexual orientation, or disability, should have access to a washroom that meets their personal needs. However, there is a clear disparity in the number of barrier-free or universal and non-accessible washrooms on campus. Currently, the majority of barrier-free/universal washrooms on university campuses is limited, and these washrooms are typically single-user. Not only are there fewer barrier-free/universal washrooms on campuses, but these washrooms are often greater distances away from general spaces on campus. This is concerning for two reasons: it can have negative effects on students socially, as it isolates them from their peers; and it can add time to a student's commute to and from class or campus events. The provincial government can address this concern by providing envelope funding to increase the number of barrier-free/universal washrooms on university campuses. Ideally these additional barrier-free/universal washrooms will be located in convenient locations across campus to limit isolation and mobility concerns that are raised when barrier-free/universal washrooms are only available in out-of-the-way locations.

Further, universities are constantly developing new residence and faculty buildings on their campuses. It is important that as new buildings are designed that the needs of students with disabilities are considered, including the need for accessible, barrier-free/universal washrooms. The Ministry of Colleges and Universities should encourage institutions to make these considerations and ensure that washrooms are easily accessible for all students.

TRANSITION

Principle: Accurate information on campus support services should be available and publicized to all prospective students with disabilities throughout the registration process as well as to current students during course registration.

Principle: Information on disability accommodation requirements must be provided to students prior to the start of each academic year, to ensure that students have enough time to have the necessary assessments completed.

Principle: All students should be introduced to accommodation and accessibility services to normalize the process of accessing services. Any student could experience a temporary disability and should be equipped with the knowledge of where to go and what to do in the event of.

Principle: All programs should be accessible.

Principle: All high school students should have adequate information about academic accommodations and accessibility resources to inform their decision-making process prior to entering post-secondary education.

Concern: Information on all disability services and documentation requirements are not effectively communicated to incoming students.

Concern: Students are often unaware that they are required to take a psychosocial assessment in advance of the start of courses, and that their university cannot accept assessments that were taken more than three to five years prior.

Concern: Without effective transition information, students who develop a disability during their post-secondary education may not be able to identify that they could benefit from or qualify for accommodations.

Recommendation: The Ministry of Education in consultation with the Ministry of Colleges and Universities (MCU) should amend the secondary school curriculum to provide high school students with knowledge of assessment and documentation requirements for academic and employment accommodations.

Recommendation: The MCU should be tasked with helping students navigate the process of getting medically recognized and emphasize the value of interim documentation of functional limitations that aid students in recognizing that they might have a disability and qualify for aid.

Recommendation: The MCU should work in conjunction with the Ministry of Education to inform high school students that some demanding programs can still be accommodated at the post-secondary level.

As students begin their post-secondary career, they are faced with a large amount of information that they must explore and digest before arriving on their campuses. For students with disabilities, this includes information about their new institution's accessibility and accommodation services. Currently, the Ontario Universities' Application Centre (OUAC) offers links to all of the accessibility offices, services, or equivalents, at each post-secondary institution in the province which allows students to explore options for each campus.¹⁶ Beyond this information provided by OUAC, there is a lack of effective communication on disability services and documentation requirements for academic accommodations. This gap in available information, coupled with the inconsistent documentation requirements across campuses, can mean that the overall process of acquiring accommodations can be confusing for incoming students who require accommodations for their residence, classes, and general campus life. The Transition Resource Guide recommends that students begin the process to receive accommodations two to three months in

¹⁶ "Accessibility for Students," Ontario Universities' Application Centre, accessed December 3, 2019, <https://www.ouac.on.ca/accessibility/accessibility-for-students/> [OUAC].

advance of arriving at their post-secondary institution so that any required documents have time to be reviewed and approved.¹⁷ However, not all students will be given information on the accommodation process before they begin at their university, or be aware that they may be required to take a psychosocial assessment that is no more than three to five years old.¹⁸ This makes transitioning more difficult and can have negative implications given the often strict deadlines to request accommodations.¹⁹

Documentation requirements also vary across campuses and depending on the accessibility needs or the nature of some of the conditions, this documentation can be no more than three to five years old.²⁰ This limitation period can push students to get assessments done just before starting their post-secondary education. However, the time needed to get the right documents may take longer than expected, which may delay access to classroom accommodations as students begin their studies. In some cases, students who previously had accommodations in high school (such as an Individual Education Plan) may be relying on documentation that will expire during their post-secondary term.

Further, thirty percent of Canadian post-secondary institutions have no formal policy on academic accommodation creating policy gaps, most especially at the undergraduate level.²¹ The variance in requirements and gaps in policy result in barriers for students with accessibility needs. Expectations and requirements need to be shared with prospective students so that they can plan for their futures and better navigate their transition into post-secondary environments.

Students need to be adequately prepared as they enter university, which is why the Ministry of Education should work with the Ministry of Colleges and Universities to amend the existing secondary school Career Studies curriculum so that high school students are informed of assessment and documentation requirements for academic and employment accommodations. These ministries must also work together to ensure that high school students are aware that programs that are perceived to be more demanding and rigorous are also required to provide accommodations for students and that all qualified students with disabilities should be given equal access and support to succeed in these programs. The Career Studies course offered to grade 10 students is the most appropriate area to integrate this information as it speaks to career and education planning.²² The curriculum amendment process should also consider the role that guidance offices play in the implementation of Career Studies. This recommendation is informed by research done by the National Educational Association of Disabled Students (NEADS) and the Learning Disabilities Association of Ontario (LDAO),²³ supporting improvements to accessibility documentation management throughout the transition process.²⁴ In addition to educating students on an accessible transition to post-secondary education, the Ministry of Colleges and Universities should take a leadership role in supporting students navigate and understand the process for documentation and interim documentation to support accommodations throughout this transition.

¹⁷ “Frequently Asked Questions,” Transition Resource Guide for Students with Disabilities, accessed December 3, 2019, <https://www.transitionresourceguide.ca/frequently-asked-questions> [Transition Resource Guide].

¹⁸ Ibid.

¹⁹ Ibid.

²⁰ Ibid.

²¹ National Educational Association of Disabled Students, *Landscape of Accessibility and Accommodation in Post-Secondary Education for Students with Disabilities* (National Educational Association for Disabled Students, July 2018), 40, online: <https://www.neads.ca/en/about/media/AccessibilityandAccommodation%202018-5landscape.pdf> [NEADS, *Landscape*].

²² Ministry of Education, *The Ontario Curriculum, Career Studies, Grade 10, Open (GLC20)* (Government of Ontario, 2019), online: <http://www.edu.gov.on.ca/eng/curriculum/secondary/career-studies-grade10.pdf> [Career Studies Curriculum].

²³ Ibid.

²⁴ Learning Disabilities Association of Ontario, *Accommodating Students with LDs in Postsecondary Studies* (Learning Disabilities Association of Ontario, 2019), online: <http://www.ldao.ca/wp-content/uploads/Accommodating-Students-with-LDs-in-Postsecondary-Studies-2019.pdf> [LDAO, *Accommodating Students*].

SUMMER TRANSITION

Principle: All students should have equal access to information about accessibility and disability services, accommodation requirements, and disclosure as part of secondary to post-secondary summer transition services.

Principle: Incorporating accessibility into summer transition programming helps reduce the stigma around disabilities by raising awareness within post-secondary institutions.

Principle: Students should have autonomy to choose the summer transition program that best suits their needs.

Concern: There is inconsistency in the information provided in summer transition programming available to students with disabilities and students with temporary disabilities or students who might experience disability later on is inconsistent.

Concern: Generalized summer transition programs insufficiently address and inform on accessibility services and supports.

Concern: Students may not attend summer transition programs due to lack of awareness or financial reasons, leading to students missing out on important transition pieces, such as accommodation requirements.

Recommendation: The provincial government should require general summer transition programs supported by government funding to integrate information on accessibility services and accommodation for all students. The funding should be provided to institutional accessibility services or equivalents as well as other institutional organizations involved in transition programming.

Recommendation: The Ministry of Colleges and Universities should mandate that all universities make specific summer transition services available for incoming students with disabilities.

Recommendation: The provincial government should task the Higher Education Quality Council of Ontario with researching best practices for transition programs and support services for students with disabilities based on findings from the *Transitions* Longitudinal Study as well as additional research to ensure consistency across institutions.

Summer transition services offer students important guidance and information as they enter post-secondary life and provide pathways for easier transition to a post-secondary academic setting. Students have advised that these programs are not substantial enough and do not provide all of the tools necessary to support them as they begin their post-secondary life. For instance, one student only learned that there was a free, live subtitling system for presentations, offered by Google, that they had access to at their institution three years into their university program. This is information that the student should have received during a summer transition program. While there are efforts to provide summer transition services for all students, there is a lack of awareness of the transition supports available to students which means that important information on how to succeed at the post-secondary level is not always relayed.

The information provided in summer transition programming available to students with disabilities and the information provided in more general summer transitions is inconsistent.²⁵ Not all students receive information on accommodation requirements as they enter post-secondary, which can leave students at a disadvantage if they develop a disability later on in their university careers or they require accommodations for a temporary disability. The National Educational Association of Disabled Students (NEADS) identifies that transition courses focused on accessibility and accommodations can be held

²⁵ Ibid.

within the same orientation programming provided to all students so that students who are unsure if they require services or if they may require them later on will be aware of their options.²⁶

Existing transition programs that include information on accommodation and accessibility services have demonstrated great success. In research conducted by the Learning Disabilities Association of Ontario (LDAO), students who participated in transition programming were more likely to access supports and hence be more successful in their academic careers.²⁷ However, generalized summer transition and orientation programs as they are now do not sufficiently address and inform on accessibility services and supports.²⁸ The impact and reach of each program depends on the individual institution, and while the government does fund programs at each institution, there are minimal guidelines and standards for how comprehensive these transition programs should be.

NEADS proposes the following key topics and practices that transition programming should include to support students in understanding accessibility and accommodation requirements and services:²⁹

Topics

- Differences between high school and university/college for students with a disability and how to be successful in a PSE environment;
- Self-awareness and self-advocacy;
- Accommodations, services, and personal strategies to meet academic, social, physical, and emotional needs;
- Determining strengths and weaknesses;
- Academic and study skills including note-taking strategies, time management, organization skills, and critical reading and writing skills;
- Campus supports and library resources;
- Community and/or government-based supports;
- Academic and exam accommodations;
- Documentation requirements and expectations for submission;
- Assistive technology options and applications; and
- Campus life, including social areas and events, accessible transportation, and accessible housing.

Practices

- Host informative speakers, such as successful students with disabilities, key support staff, and graduates with disabilities;
- Offer some opportunity for prospective students to socialize, discuss, and ask questions;
- Provide meeting opportunities with key support staff and orient students to available facilities; and
- Offer an introduction to assistive technology, what it does, and how to access it.

These topics and practices were compiled from students who have gone through transition programming and offer a thorough checklist of standard procedures that should be implemented across all institutions.

To support the implementation of the topics and practices listed above in summer transition programs, the provincial government should require that all general summer transition programs supported by government funding integrate information on accessibility services and accommodation for all students. Furthermore, the Ministry of Colleges and Universities (MCU) should mandate that all universities make specific summer transition programs available for incoming students with disabilities. This provides

²⁶ National Educational Association of Disabled Students, *Enhancing Accessibility in Post-Secondary Education Institutions: A Guide for Disability Service Providers* (Ottawa: National Educational Association for Disabled Students) [NEADS, *Enhancing Accessibility*].

²⁷ LDAO, *Accommodating Students*, n 24.

²⁸ "Summer Transition Programs for students entering college or university," Learning Disabilities Association of Ontario, accessed December 3, 2019, <http://www.ldao.ca/summer-transition-programs-for-students-entering-college-or-university-sign-up-now/> [LDAO, "Summer Transition Programs"].

²⁹ NEADS, *Enhancing Accessibility*, n 26.

students with the autonomy to choose the program that will best serve their needs and comfort level. With enhancements to both general and specific summer transition programming, all students will be more aware of the support services and accommodation options available to them. Including information about accessibility and accommodation services in all transition programming will also help to reduce stigma associated with accessing these services as more students will understand and learn about them.

The provincial government should also task the Higher Education Quality Council of Ontario with researching best practices for transition programs and support services for students with disabilities based on findings from the *Transitions Longitudinal Study* as well as additional research to ensure consistency across institutions.³⁰ The *Transitions Longitudinal Study*, funded by the MCU, began in 2004 and ran seven years before the funding was cut. However, the Learning Opportunities Task Force (LOTF) was able to make some recommendations and create a transferable model based on the data that was available. The comprehensive and individualized model aims to include all disabilities and promotes practices that can make a great difference in the lives of students with accessibility needs. This model is a strong foundational for developing best practices for summer transition programs that support all students.

TRANSITION INTO EMPLOYMENT

Principle: The opportunity to participate in the workforce after the completion of post-secondary must reflect the fact that all students have different functional limitations.

Concern: Students with disabilities do not have sufficient opportunities to build their expertise and career-related experience before graduating from post-secondary.

Concern: A student's functional limitations may limit them from working while studying, which prevents them from gaining work experience during their studies.

Concern: Students may choose to work in a part-time position where they are sure their accommodation needs will be met rather than choosing to start a new full-time position where they are unsure if their accommodation needs will be met.

Concern: Students with invisible disabilities face an additional barrier to acquiring a job given the limited knowledge of how, when, or if to disclose a disability to a potential employer.

Concern: Students with visible disabilities face barriers to acquiring a job earlier on in the process.

Recommendation: The Ministry of Colleges and Universities should partner with post-secondary institutions and businesses to increase work integrated learning opportunities that are equally available to students with disabilities to meet the current student demand.

Recommendation: Employment Ontario should expand upon existing incentives to hire youth by adding combined disability youth incentives and support similar to those offered by the Ontario Disability Support Program: Employment Supports.

Recommendation: The provincial government should provide funding to institutions for the training of an existing career consultant or a career consultant specifically dedicated to supporting students with disabilities transition into the workforce.

Recommendation: The provincial government should make work integrated learning opportunities, including research grants, available for students with disabilities.

³⁰ Larry McCloskey, Kim Figura, Katherine Narraway, and Boris Vukovic, *Transitions Longitudinal Study: 7th Annual & Final Report to the Ministry of Training, Colleges and Universities* (June 2011), online: <https://carleton.ca/fita/wp-content/uploads/Year-7-Annual-Report.pdf> [Transitions Longitudinal Study].

Post-secondary education gives students the credibility and agency to launch themselves into the workforce following graduation. All students should have the same opportunities to participate in the workforce after the successful completion of their post-secondary experience. Unfortunately, students with disabilities do not have sufficient opportunities to build their expertise and career-related experience before graduating from university.³¹ For example, work experience is typically gained through part-time or summer employment, which can be less accessible or flexible for those with accessibility needs. A student's functional limitations may limit them from working while studying, which prevents them from gaining work experience during their studies.³²

There are also social barriers that students with disabilities face when it comes to employment. One of the most prominent barriers to acquiring a job is limited knowledge on how and when to disclose a disability to a potential employer.³³ Students may not even be aware of whether disclosure is necessary, particularly if they have an invisible disability. Additionally, as they transition out of post-secondary, students may stay at a part-time time job where they know their accessibility needs will be met, rather than seeking full-time employment where they have to navigate disclosure obstacles. For employers, there is the likelihood that they are either not aware or willing, or lack the supports necessary, to hire individuals with accessibility needs. Students with visible disabilities are particularly disadvantaged by these employer biases, although they can have negative effects on all job candidates with disabilities. These are a few examples of structural barriers that students with disabilities continue to face when seeking employment.

To empower students with accessibility needs to gain the work experience necessary to secure employment post-graduation, the Ministry of Colleges and Universities should partner with post-secondary institutions and businesses to increase work-integrated learning opportunities that are equally available to students with disabilities to meet the current student demand.³⁴ Opportunities for these students could be acquired through institutional partnerships, structured work experience, systemic training, mentorship, or volunteering experiences.³⁵

There is also opportunity for the provincial government to support students with disabilities access employment through the Career Ready Fund. In 2018, Carleton University received \$800,000 from the provincial government through the Career Ready Fund which they used to develop and implement the Carleton University Accessible Experiential Learning project to provide experiential learning opportunities to students with disabilities to help prepare them for the workforce. The goal of the initiative was to increase the employment success rate of students with disabilities transitioning out of post-secondary education to reach rate on par with the general population.³⁶

In addition to the lack of incentives, social barriers mean that employers may be hesitant to hire students or new-graduates with accessibility needs.³⁷ Therefore, it is recommended that Employment Ontario expand its existing incentives to hire youth by adding combined disability youth incentives similar to those offered through the Ontario Disability Support Program: Employment Supports.³⁸ This expansion would not only incentivize employers to hire students with disabilities, but would also increase their capacity to do so given the financial cost of some accommodations.

To address the concern that there is a lack of clarity around gaining employment and disclosure for students, an increase in on-campus services is necessary. To alleviate some confusion and support student employment, the provincial government should provide funding for institutions to hire a career

³¹ National Educational Association of Disabled Students, *Accessibility and Universal Design in Career Transitions Programming and Services: Final Report – February 2019* (prepared for CERIC), online: <https://ceric.ca/project/accessibility-and-universal-design-in-career-transitions-programming-and-services/> [NEADS, *Career Transitions Report*].

³² Ibid.

³³ Ibid.

³⁴ R. A. Malatest & Associates, Ltd., *Barriers to Work-integrated Learning Opportunities* (Toronto, ON: Higher Education Quality Council of Ontario, 2018) [HEQCO, *Barriers to WIL*].

³⁵ Ibid.

³⁶ "Carleton Gets \$800,000 from Ontario to Kickstart Careers for Students with Disabilities," Carleton Newsroom, April 30, 2018, online: <https://newsroom.carleton.ca/2018/carleton-gets-800000-from-ontario-to-kickstart-careers-for-students-with-disabilities/>

³⁷ "Hire a young person," Government of Ontario, accessed December 6, 2019, <https://www.ontario.ca/page/hire-young-person>

³⁸ "Employment Supports: What is available," Ministry of Children, Community and Social Services, accessed December 6, 2019, https://www.mcscs.gov.on.ca/en/mcscs/programs/social/odsp/employment_support/available_supports.aspx

consultant dedicated to supporting students with disabilities transition into the workforce, or to train an existing career consultant in accessibility and accommodation needs. This consultant would advise students on the details of applying for jobs, interviewing, disclosing, and working in a new environment. This funding should also contribute to the development and implementation of advanced programming based on best practices.³⁹ Accommodation funding is provided to Canadian post-secondary campuses to provide accommodations in academic settings. However, these accommodations do not extend to varied learning environments, including work-integrated learning placements.⁴⁰ A trained career consultant whose primary purpose is to facilitate a smooth transition from post-secondary studies into the workforce would help to address some of these concerns and ensure students with disabilities have the tools they need to contribute to the province's highly-skilled workforce.

SUPPORT SERVICES

Principle: Institutions should be equipped to accommodate the needs of students with disabilities to the point of undue hardship.

Principle: Students have unique needs and access to varying levels of accommodation is crucial for academic achievement.

Principle: Students with disabilities should be able to easily understand the different and required processes for registration at accessibility offices.

Principle: In the event of a dispute with accessibility services, students should have an independent arbitrator assess how accommodations can be provided.

Concern: Faculty and staff may not be equipped with the proper training or resources to support academic accommodations, such as incorporating Universal Design for Learning principles or referring students to accessibility services.

Concern: Variability in documentation requirements between post-secondary institutions make the post-secondary application process difficult to understand.

Concern: Students may be limited in their choice of institution because they do not have the required documentation for academic accommodations at their preferred school.

Concern: Centralized bodies like the Inter-university Disability Issues Association (IDIA) do not have sufficient resources to research innovative new models for accessibility, such as unique pedagogy or campus navigation.

Concern: Not every institution holds an independent review process for appeals for accommodations, resulting in the original ruling body to render the same decision.

Concern: The Ontario Human Rights Commission only broadly defines disability which fails to encompass individuals with semi-permanent disabilities, which are expected to persist and cause disruptions for the duration of a student's career at a post-secondary institution.

Recommendation: The provincial government should provide funding to the IDIA to conduct research on standards of practice for post-secondary institutions to provide supports to students with disabilities.

Recommendation: The provincial government should work with the IDIA to develop standard documentation for admissions applications and verifying students' disabilities.

³⁹ NEADS, *Career Transitions Report*, n 31.

⁴⁰ Ibid.

Recommendation: The Ministry of Colleges and Universities (MCU) should task the Higher Education Quality Council of Ontario with creating a standard to evaluate the effectiveness of accessibility services at post-secondary institutions.

Recommendation: The MCU should mandate that institutions have an independent body such as an ombuds office or similar role to review complaints about accessibility services.

Recommendation: The Ontario Human Rights Commission should create a formal definition or develop a definition of disability that describes individuals with functional limitations that are expected to persist, but not necessarily for their whole life.

Disabilities come in various forms – some of which may not be readily apparent to others. Students with physical disabilities, such as those that require the use of mobility devices, face different challenges than students with psychiatric disabilities, such as dyslexia. However, regardless of the type of disability a student has, post-secondary institutions create barriers to equitable access. These barriers need to be dismantled as students with disabilities have the same right to access education as students without disabilities.⁴¹

The Ontario Human Rights Code (Code) states that post-secondary institutions, as education providers, have “a legal duty to accommodate the needs of students with disabilities.”⁴² The accommodations must be provided to the point of undue hardship, which is determined according to cost, outside funding, or health and safety requirements.⁴³

All students should have the same access and awareness of the accommodations process. International students, whose first language may not be the primary language adopted by the institution, should have the same degree of access as domestic students. This raises the need for accessibility support services to be offered in a variety of languages, and to be communicated clearly and concisely. This is especially important given the rise in international student enrolment at Ontario universities.⁴⁴

Faculty and staff are key to supporting students’ access to accommodations and accessibility services, but there is inconsistency in the implementation of these services. Some faculty have limited familiarity with the legal responsibility to provide accommodations.⁴⁵ Others have limited experience supporting students with disabilities and lack access to the appropriate training to do so.⁴⁶

The variability in documentation requirements for students with disabilities poses a barrier to students as well. Institutions address accommodations in different ways, with some schools making it more difficult than others to prove the existence of the disability.⁴⁷ The variability is problematic because “the lack of consistency creates potentially unequal opportunity to acquire accommodations for students who identify with a learning disability.”⁴⁸ This is particularly impactful for students who may be transferring from another university and may no longer be eligible for accommodations due to the difference in documentation requirements. Prospective university students may also find themselves attending the institution that will provide their needed accommodations, rather than the university that they prefer for educational reasons. International students may have additional difficulty with procuring the required documents due to different perceptions of disability in their home country, or because of medical documents written in a language not spoken by staff in accessibility offices.

⁴¹ OHRC, *Policy on Accessible Education*, n 1.

⁴² Ibid.

⁴³ Ibid.

⁴⁴ Statistics Canada, “Canadian postsecondary enrolments and graduate, 2016/2017,” released November 28, 2018, online: <https://www150.statcan.gc.ca/n1/daily-quotidien/181128/dq181128c-eng.htm>

⁴⁵ Terreberry, n 14, 14-20.

⁴⁶ Ibid.

⁴⁷ Cameron McKenzie, “Navigating post-secondary institutions in Ontario with a learning disability: The pursuit of accommodations,” *Canadian Journal of Disability Studies* 4, no. 1 (2015): 36-58, 46-48 [McKenzie].

⁴⁸ NEADS, *Landscape*, n 21, 48.

The Inter-University Disability Issues Association (IDIA) is an organization comprised of university accessible education professionals from across the province.⁴⁹ Its primary purpose is to share best practices amongst its member institutions, although it does not publish reports from its findings. The executive members serve as senior staff at their institutions' accessibility offices, and thus have limited time to publish research for the group. The provincial government should provide funding to the IDIA to support the creation of public research, drawing upon the expertise of its member institutions. The research should focus on ways to improve support services for students with disabilities, streamline the academic accommodations process, cultural and language supports for international students, and how documentation requirements affect students' access to academic accommodations. The findings of the IDIA research should be used to develop a set of standardized documentation requirements, in order to limit confusion and to ensure equitable treatment of students with disabilities at Ontario universities. Future research should also include ways to create more accessible pedagogy and learning environments, citing successes from its member institutions.

The provincial government should task the Higher Education Quality Council of Ontario (HEQCO) with evaluating the current level of access in the post-secondary sector. HEQCO should determine ways universities can enhance their support services and improve access for students with disabilities. Their findings should be published and shared with the IDIA in order to provide each school with the opportunity to address any inefficiencies and to adopt best practices.

Finally, institutions or individual faculty members may fail to accommodate students with disabilities due to a systemic failure or lack of will to do so. In some instances, a student denied accommodation has no recourse beyond appealing to the very body that rendered the decision.⁵⁰ In order to ensure the process is fair, the Ministry of Colleges and Universities should mandate that independent bodies such as ombudspersons be responsible for reviewing complaints about accessibility services in order to support students throughout their post-secondary careers.

In other instances, students with semi-permanent disabilities may have barriers to accessing to accommodations to begin with as the Ontario Human Rights Commission's definition of disability is broad and can be interpreted to exclude students who do not have a permanent or temporary disability. Students with semi-permanent disabilities may experience functional limitations that persist and cause disruptions for the duration of their post-secondary career. The Ontario Human Rights Commission should acknowledge this limitation in their broad definition and develop a definition to capture the experiences of those with semi-permanent disabilities to ensure these students are not forgotten in the provision of support services.

MENTAL HEALTH SERVICES

Principle: Students with disabilities have unique needs and intersecting identities that mental health counselling should take into consideration.

Principle: Mental health services should be easily accessible to persons with disabilities.

Principle: Mental health services are often part of the primary care mechanisms for persons with psychosocial disabilities.

Concern: Mental health services may not take into account the unique lived experiences and functional limitations of students with disabilities.

Concern: Mental health services are not always easily accessible to persons with disabilities.

⁴⁹ NEADS, *Enhancing Accessibility*, n 26, 39.

⁵⁰ For example, Western University's appeal procedure requires reconsideration by the same body that made the initial decision: *Western University Policy on Academic Accommodation for Students with Disabilities*, 2019, online: https://www.uwo.ca/univsec/pdf/academic_policies/appeals/Academic%20Accommodation_disabilities.pdf

Recommendation: The Ministry of Health and Long-Term Care should develop best practices for a “whole of community approach” that supports comprehensive and accessible mental health services for students with disabilities.

Students with disabilities have unique experiences that may require specialized counselling. For students with psychosocial disabilities, access to appropriate mental health services can be a necessity to navigate post-secondary education, but there are limitations to these services being available.

In order to ensure the mental well-being of students with disabilities, the provincial government should “provide dedicated funding for community based mental health providers to supply culturally relevant and diverse counselling on campuses.”⁵¹ This funding should be used to allocate greater resources to mental health provision for students, on campus and in the surrounding area. These resources must take into account how students’ disabilities affect their lived experiences and should be used to provide specialized care. It is important that students are able to access care that meets their accessibility needs, mental health needs, and unique needs that sit at the intersection of disability and mental wellness. In some cases, campus resources are ill-equipped to address this intersection. This requires improvements to campus supports as well as greater access to community resources for students in the interim. These services should be accessible and convenient for students, and therefore need to be available both on campus and within the surrounding community. The Ministry of Health and Long-Term Care should create a standard for a “whole of community” approach to mental health. This approach to mental health provision ensures that it will meet the needs of students as they enter, continue, and finish their post-secondary education.⁵²

FUNDING ACCESSIBILITY SERVICES

Principle: Access to assistive technologies through various institutional departments is critical to students’ success.

Principle: Institutions should cover the costs of accommodations for students such as assistive technologies when the accommodations are used for post-secondary curriculums.

Principle: Post-secondary accessibility offices should have enough money to support every registered student with a disability.

Principle: Peer support services are effective in helping students with disabilities succeed.

Concern: Post-secondary institutions may not have sufficient funds available for assistive technologies.

Concern: Assistive technologies are often expensive for individual students with disabilities to purchase.

Concern: Students registered with accessibility offices who are pursuing certificates rather than degrees receive accommodations but are not considered when the Ministry of Colleges and Universities (MCU) determines funding for accessibility offices.

Recommendation: The provincial government should provide additional envelope funding through the Accessibility Fund for Students with Disabilities for post-secondary institutions to secure assistive technologies for students.

Recommendation: The provincial government should provide funding for institutions to supply and cover the costs of assistive technologies on behalf of students.

⁵¹ *In It Together: Taking Action on Student Mental Health* (Toronto, ON: Ontario Undergraduate Student Alliance, 2018).

⁵² Hannah Beckett, Stephanie Bertolo, Katherine MacCabe, and Landon Tulk, *Policy Paper: Student Health & Wellness* (Toronto, ON: Ontario Undergraduate Student Alliance, 2018).

Recommendation: The MCU should include the number total number of students when calculating how much funding accessibility offices receive, not just the number of students pursuing a degree.

Recommendation: The provincial government should provide additional envelope funding through the Accessibility Fund for Students with Disabilities for additional accessibility support services.

Recommendation: The provincial government should task the Higher Education Quality Council of Ontario (HEQCO) to develop a standard for the appropriate amount of funding for accessibility offices.

In some instances, the barriers faced by students with disabilities can be mitigated with assistive technologies. These devices, such as voice output devices or braille printers, give students with disabilities the opportunity to “better... access the information available to them and to participate fully on campus.”⁵³ Many post-secondary campuses offer some form of assistive technologies, but they can be costly, and it may be difficult to provide enough of these resources to support all students who may require them.

Some institutions offer peer support programs, which provide workshops or peer mentoring for students with disabilities. The McMaster Students’ Union has one such peer support program called Maccess.⁵⁴ Maccess offers peer support and helps students with disabilities navigate the university’s accessibility policies. Peer support programs can be effective tools in ensuring students with disabilities are successful during their studies.

In order to support the procurement of assistive technologies and the development of peer support services, the provincial government should provide envelope funding through the Accessibility Fund for Students with Disabilities (AFSD). The AFSD funds a portion of a university’s operating grant to support accessibility services, including the operation of these centres, professional development, or the purchase of adaptive technologies.⁵⁵ However, at some institutions, libraries also provide assistive technologies for students.⁵⁶ As such, portions of the AFSD should fund assistive technology at libraries and miscellaneous accessibility services intellectual property. As such, portions of the AFSD should fund both accessibility offices and library services to purchase and maintain assistive technologies. The AFSD should also include funding for the development of institutions’ peer support programs.

The AFSD should count all students when determining the amount of money in grants to provide institutions. Consultations with Wilfrid Laurier University’s Accessible Learning Centre indicated that the AFSD only provides funding to students in degree-seeking programs. The number of students who are pursuing diplomas or certificates does not increase the amount of funding. The Ontario Human Rights Code dictates that everyone has a right to accommodations, and as such, accessibility offices at universities should be able to assist all students. Institutions must have enough resources dedicated to every student attending a post-secondary institution, regardless of the nature of their program.

In order to ensure institution accessibility services are adequately staffed, the provincial government should task the Higher Education Quality Council of Ontario with developing a standard for the amount of resource funding institutions should receive per student. This standard should be used to determine whether institutions should allocate additional funding to their accessibility services.

The ultimate goal of these support services is to ensure that students have access to, and feel comfortable in, all campus locations. Accessibility and accommodations should exist beyond individual accessibility centres. Further creation and funding of accessibility supports ensure that accessibility is achieved campus-wide.

⁵³ NEADS, *Enhancing Accessibility*, n 26.

⁵⁴ “Peer Support at Maccess,” McMaster Students Union, accessed December 6, 2019, <https://www.msumcmaster.ca/services-directory/47-msu-maccess/peer-support-at-maccess>.

⁵⁵ Ontario Human Rights Commission, *The Opportunity to Succeed: Achieving Barrier-free Education for Students with Disabilities* (Ontario Human Rights Commission, 2018).

⁵⁶ “Accessibility (Waterloo),” Laurier, Library, accessed December 6, 2019, <https://library.wlu.ca/locations/waterloo/accessibility>.

ACADEMIC ACCOMMODATIONS

Principle: Accommodations must be made for all students with disabilities who require them, as is consistent with the Ontario Human Rights Code.

Concern: Students may be denied access to their required accommodations for certain courses due to faculties' concerns about protecting intellectual property.

Concerns: Post-secondary accessibility policies lack a consistent review process.

Recommendation: The provincial government must mandate that universities adopt a consistent and systematic review process of their academic accommodations policy every five years to ensure that the policy remains relevant and up to date.

Students with disabilities may face a lack of equal access to accommodations in their post-secondary academic life; such as a lack of consistent access to standardized but individualized accommodations.

The Ontario Human Rights Commission's *Policy on Accessible Education for Students with Disabilities* acknowledges the unique barriers that students with disabilities face. The policy reflects its interpretation of the Ontario Human Rights Code [Code] which states the right to equal treatment as it pertains to services for persons with disabilities.⁵⁷ Under the Code: "Education providers have a legal duty to accommodate the needs of students with disabilities who are adversely affected by a requirement, rule or standard."⁵⁸

Institutions are required by law to accommodate students' needs up to the point of undue hardship. Hardships that do not meet this threshold, while they may be inconveniencing, do not negate the responsibility of the institution to provide necessary accommodations to students who require them. There are three criteria in place to assess whether or not the point of undue hardship has been met, namely: cost; outside sources of funding, if any; and health and safety requirements, if any.⁵⁹

The aim of accommodating students with disabilities is to ensure that they have equal opportunities, access, and benefits, as their counterparts and that they enjoy a full and inclusionary life. An appropriate accommodation is one that is achieved when students are treated with respect and dignity, where their individual needs are not only supported but promoted.

The appropriateness of academic accommodations is based on their ability to provide students with disabilities with equal opportunity for purposeful access to education.

"An appropriate accommodation at the post-secondary level would enable a student to successfully meet the essential requirements of the program, with no alteration in standards or outcomes, although the manner in which the student demonstrates mastery, knowledge and skills may be altered. In this way, education providers are able to provide all students with equal opportunities to enjoy the same level of benefits and privileges and meet the requirements for acquiring an education without the risk of compromising academic integrity."⁶⁰

There may be confusion around what programs or classes can be accommodated. Some programs have demands that exceed the average amount like a chemistry laboratory class, for example. Though there are cases where there are no accommodation options, where possible, students should be accommodated to the point where they may achieve the minimum learning objectives of the course.⁶¹

⁵⁷ Ontario Human Rights Code, 1990, c. 19, s 1. <https://www.ontario.ca/laws/statute/90h19#BK3> [Code].

⁵⁸ OHRC, *Policy on Accessible Education*, n 1.

⁵⁹ Code, n 57, s 17(2).

⁶⁰ Ontario Human Rights Commission, "Main Barriers to Education for Students with Disabilities," (fact sheet), online: <http://www.ohrc.on.ca/en/main-barriers-education-students-disabilities-fact-sheet>.

⁶¹ OHRC, *Policy for Accessible Education*, n 1.

There have been some significant strides as it pertains to accommodations, including students no longer being required to disclose their disability when seeking accommodations and the implementation of province-wide documentation standards which now exist in the area of mental health. However, despite these improvements, much more work needs to be done to promote access to, and ensure utilization of, accommodations within universities in order to ensure a level playing field for students with disabilities.

For example, students have shared that they have experienced barriers to receiving academic accommodations from faculty who perceive the nature of the accommodation to interfere with their intellectual property rights. There is also no consistent review process in place for post-secondary accessibility policies. While there are many improvements that must be made to these policies, as are outlined below, it is also important that the provincial government ensure that universities adopt a consistent and systematic review process for their policies at least every five years. This will help policies stay up-to-date and allow more opportunities to fill identified gaps.

DOCUMENTATION

Principle: Documentation requirements should be consistent for all postsecondary students seeking academic accommodations.

Principle: Any documentation on which accommodations are based need not disclose any specific diagnosis but should instead be used to discern functional limitations.

Principle: Province-wide mental health documentation standards should be equally and consistently enforced, as is the standard for all other areas of province-wide documentation.

Concern: Province-wide documentation standards in the area of mental health are not reviewed in an adequate and timely manner given the rapid evolution of knowledge on mental health.

Concern: Accommodation policies and their implementation vary across institutions, which creates inequities for students with disabilities requiring accommodations.

Concern: The standards surrounding the resubmission of disability documentation may place undue pressure and hardship on students who are seeking accommodations for learning disabilities and/or ADHD which require specific psycho-educational assessments.

Concern: Students who have unique cultural, geographic, or socio-economic circumstances, often experience additional barriers when accessing documentation requirements.

Concern: Institutions may not recognize or understand all disabilities and associated functional limitations and therefore may not be equipped to provide the necessary academic accommodations.

Recommendation: The government should task the Higher Education Quality Council of Ontario with conducting adequate and timely review of province-wide documentation standards in the area of mental health for post-secondary students.

Recommendation: The provincial government should task the Higher Education Quality Council of Ontario with conducting a review of the current standards on disability documentation resubmission to ensure that standards are not unduly burdensome on students with differing ranges or types of disabilities.

Recommendation: The provincial government should conduct an extensive review of existing academic accommodation standards at Ontario universities to assess the adequacy of the range of accommodations provided.

Recommendation: The provincial government should mandate that the standards and guidelines for province-wide documentation are being enforced equitably across all institutions.

Recommendation: The provincial government should mandate that province-wide documentation standards do not require students with registered permanent disabilities to seek additional forms of documentation, such as doctor's notes.

Recommendation: The provincial government should expand the Ontario Health Insurance Program coverage to include the cost of doctor's notes and medical notes.

Recommendation: The provincial government should task the Higher Education Quality Council of Ontario with reviewing the assessment requirements for students seeking academic accommodations based on a learning disability and/or ADHD to ensure that these requirements do not cause undue hardship on students.

Institutions bear the burden of ensuring that students are provided with accommodations that meet their needs. In order for students to gain access to these accommodations, they are required to submit documentation that support their need for said accommodations. However the documentation process has been proven to be inconsistent across post-secondary institutions, specifically regarding what documents are required, how documentation is assessed for accommodation needs, and how recent the documents need to be in order to be accepted.⁶² This may unfairly disadvantage some students with disabilities as it means that they may be denied access to certain accommodations that other students at other post-secondary institutions are able to access. A specific example of this is where each institution has its own requirements for how recent psycho-educational assessment documentation needs to be. This can place undue pressure on certain students to have assessments redone who, in the interim, may not be able to access the breadth of accommodations that they may need. It is *only* at *some* institutions that students *may* be given access to interim accommodations while they await their updated documentation.⁶³

The inconsistency in documentation standards is especially problematic as it pertains to documentation standards for mental health disabilities. First, there needs to be consensus on what the documentation requirements should be. For example, many institutions request both a diagnostic statement and some assessment of functional limitations.⁶⁴ Most also request some form of rating on a number of scales of functional limitations, although there is a wide variation with regard to which dimensions are being assessed and how the limitations are being scaled.⁶⁵ Dr. Cheng, a psychiatrist and the Medical Director of First Place Clinic and Regional Resource Centre in Thunder Bay, and Co-Chair of the Early Psychosis Intervention Ontario Network (EPION), indicates that these bases of assessment may not be reliable or fair, as reaching a conclusive diagnosis could take between 7-18 months; even in a case where it is obvious that a student needs accommodations. Physicians have also reported that “they are not trained in recommending specific accommodations and believe that this is the ambit of disability advisors.”⁶⁶ This suggests that many institution's accommodation policies may disadvantage their students in situations by not effectively and efficiently accommodating their disabilities. This is particularly concerning given that mental health disabilities affect a significant proportion of post-secondary populations (a survey of 118,000 university students with disabilities showed 35.1% of persons identified as having a type of disability related to mental health).⁶⁷

Against this background, OUSA believes that a review of province-wide documentation requirements is critical. The province must assess and refine documentation standards, especially as knowledge on mental health disabilities continues to evolve and be understood, specifically as it pertains to the standardization of the documentation requirements process, the assessment of functional limitations, and the types of accommodations provided. A more effective system needs to be implemented to ensure equal access to

⁶² Transition Resource Guide, n 17.

⁶³ Ibid.

⁶⁴ Condra & Condra, n 6.

⁶⁵ Ibid, 8.

⁶⁶ Ibid, 7.

⁶⁷ Adele D. Furrie, *Post-Secondary Students with Disabilities: Their Experience – Past and Present* (National Educational Association for Disabled Students, November 2017), online: <https://www.neads.ca/en/about/media/Final%20reportCSD2012AdeleFurrie2-3.pdf>.

accommodations, especially for all who require them. One way to do this is to task the Higher Education Quality Council of Ontario with conducting adequate and timely review of province-wide documentation standards in the area of mental health for post-secondary students as well as the current standards on disability documentation resubmission to ensure that standards are not unduly burdensome on students with differing ranges or types of disabilities. Once reviewed, the provincial government should mandate that the standards and guidelines be enforced equitably across institutions to support all students in the province.

A key aspect of the documentation process for students with disabilities includes requirements for students to submit medical or doctors' notes as proof of functional limitations. This creates barriers for students who have financial limitations to paying for required documentation, as well as for students who have unique cultural, geographic, or socio-economic circumstances. Students who are seeking accommodations directly related to their disabilities should not be required to pay the cost of a doctor or medical note. In the spirit of providing an equitable playing field for students with disabilities, the province should expand the Ontario Health Insurance Program to cover this expense. For students with registered permanent disabilities, additional documentation in the form of a doctor or medical note should not be required.

The province of Ontario must work with institutions and technical advisors to streamline and refine accommodation processes to ensure that all students with disabilities benefit from the full protection afforded to them under the Ontario Human Rights Code.

PROCESSES

Principle: Accessibility offices should lead the organization of accommodations for students with disabilities, all universities should make accommodating students with disabilities a priority.

Principle: Academic accommodations for students with disabilities should be consistent, reliable, and easily accessible.

Principle: Students should have a safe environment throughout the process of seeking accommodations.

Principle: Institutions should adequately inform students with disabilities about the range of accessibility services available to them.

Principle: Academic accommodations should be implemented in a manner that accounts for academic dates and course schedules.

Concern: Students with disabilities have a greater chance of facing intense academic strain which may be further compounded by them having to navigate the administrative process.

Concern: Students are often not provided with the necessary and/or proper information regarding the different forms of academic accommodations available to them.

Concern: Students often experience hurdles when seeking access to the academic accommodations they need to meet their full potential.

Concern: Delays in the implementation of academic accommodations can severely hinder a student's ability to succeed.

Recommendation: The provincial government should mandate that universities' accommodation policies are aligned with Ontario Human Rights Commission's *Policy on accessible education for students with disabilities* to ensure that accommodations are provided to students in a manner that complements the regular academic dates and course sessions.

Recommendation: The provincial government should mandate that a standardized interim accommodation process be implemented across all institutions so that all students with disabilities have access to the same level of interim accommodations and support.

Recommendation: The provincial government should direct the Higher Education Quality Council of Ontario (HEQCO) to investigate best practices in academic accommodation processes to be adopted by University accessibility services.

Recommendation: The provincial government should mandate that accessibility services utilize the best practices provided by HEQCO in the training of instructors and staff on how to best facilitate academic accommodations.

It is imperative that the province ensures that there is consistent review and province-wide implementation of best practices pertaining to the accommodation process in post-secondary institutions. In a case study of students with learning disabilities at Ontario universities, the investigators found that “facilitators of individual capacities and coping skills combined with institutional and provincial policies mitigated the potential negative effects of [learning disabilities]. While developing individual facilitators is important, the participants acknowledged that their success depended on the provision of services, accommodations, and assistive technology.”⁶⁸ This offers one example of how institutional policies and practices, particularly those that provide accommodations, have been found to be key contributors to the success of students with disabilities at post-secondary institutions. To ensure all students are given the same opportunities to succeed, the process surrounding the delivery of accommodations to students with disabilities must be efficient, easily accessed and standardized.

Although much work has been done in the creation of policy, and some work has been done to implement these policies, students are not always informed of the range of accommodations available to them. In consultations done with students at OUSA’s member schools, some students indicated that they were not made aware of their school’s Accessibility Services Office, while others indicated that they were informed by friends or had to seek out the accessibility office themselves.⁶⁹ The province must first ensure that institutions are carrying out their mandate to sufficiently and uniformly promote the existence of these services to relevant parties so that students with disabilities do not have to navigate confusing processes in addition to academic strain.

All students entering university should be informed of available accommodations to remove the onus on students with disabilities to ask. Information on disability accommodation should be provided during orientation. The National Educational Association of Disabled Students recommends offering online training for new students, which can be done by setting up training modules online that a student must complete prior to registering for classes. This training should include many of the same key topics as general orientation sessions which ensures that all students are equally informed, regardless of whether they are able to attend orientation. Further, interactive tools that support students to set goals, better understand the accommodations available for their disability, practice using assistive technology, go through the accommodation request procedures, and generally prepare them to navigate the post-secondary accessibility landscape, should be provided.⁷⁰

All students should have access to effective and timely accommodation in order to provide them with a necessary foundation for academic success. Accommodations are not always provided to students in a timely manner which is particularly problematic for both students and their institutions, as under the Ontario Human Rights Code, “unreasonable delays [to provide accommodations] may be found to violate the procedural duty to accommodate, and thus constitute a breach of the Code”.⁷¹ Students who are aware

⁶⁸ Stephanie Fullarton & Cheryll Duquette, “Experiences of Students with Learning Disabilities in Ontario Universities: A Case Study,” *International Journal of Special Education* 31, no. 1 (2016): 55-66, <https://files.eric.ed.gov/fulltext/EJ1099971.pdf> [Fullarton & Duquette].

⁶⁹ Consultation with student, September 2019.

⁷⁰ NEADS, *Enhancing Accessibility*, n 26, 20.

⁷¹ “Accommodation process,” Ontario Human Rights Commission, accessed September 17, 2019, <http://www.ohrc.on.ca/en/guidelines-accessible-education/accommodation-process>.

of their accommodation needs should be allowed to arrange for these accommodations prior to the start of their upcoming semester so as to ensure that needs are met in a timely manner.

In some institutions, students report experiencing numerous hurdles at various stages throughout the academic accommodation process. This is due in part to the uneven application of accommodation policies across institutions, with only a few establishing a framework to promote awareness and acceptance of disability related issues and persons.⁷² For instance, students consulted as part of OUSA's policy development process reported that they faced a lack of understanding and insensitivity by professors who posed an added barrier to a student's access to accommodations, such as extra time for assignments. This is a clear indication of a break down in the accommodation process between accessibility office and faculty.

Not only must accommodations be provided in a timely manner, but they must also be consistent. Unfortunately, accommodation processes are inconsistent, and can be unreliable and inaccessible. To address this, the provincial government should mandate that all university accommodation policies align with the Ontario Human Rights Commission's *Policy on Accessible Education for Students with Disabilities*. They can also support institutions to enhance their accommodation processes by tasking the Higher Education Quality Council of Ontario with investigating best practices for institutions to adopt, and then mandate that institutions utilize these best practices when training instructors and staff to support better facilitations of academic accommodations.

Some students, including those with visual impairments, have reported waiting for weeks before they are able to access books and course material.⁷³ As there may be cases where delay is unavoidable, providing interim accommodations for students while they wait for documents to be reviewed or assessments to be made is one way to mitigate the challenges that can arise as a result. However, there is currently no standard guidelines for interim measures, which can hinder the ability of some students to succeed in their academic studies. In order to ensure that all students have equal opportunity to succeed in university, the provincial government should mandate that institutions adopt consistent measures for interim accommodations. These interim measures should not be unduly burdensome for any university to provide but should meet the needs of the student who requires them. For example, a university can provide a student with visual impairments a personal reader while they are waiting for access to braille text. Interim responses should be standardized across institutions and the provincial government can facilitate this by providing institutions with the tools needed to make this a reality.

FINANCIAL BARRIERS

Before explaining OUSA's recommendations for changes to the current financial assistance programs for students living with disabilities, it is important to review the existing financial resources available. The responsibility for assisting students with disabilities is currently shared by the provincial and federal governments.

Ontario Bursary for Students with Disabilities (BSWD): The BSWD is for students with permanent or temporary disabilities who are studying full- or part-time at a post-secondary institution and have financial need.⁷⁴ Students who qualify for the Ontario Student Assistance Program (OSAP) or the Canada Student Grant for Part-time Students (CSG-PS) can receive this bursary. Up to \$2,000 is available to assist with the costs of disability-related services or equipment, such as tutors, note-takers, interpreters, translators, or technical aids.⁷⁵ Students are required to submit an estimate of the services or equipment

⁷² NEADS, *Landscape*, n 21, 41.

⁷³ Matthew Halliday, "Publishers, University Struggle to Provide Timely Access to Accessible Textbooks," University Affairs, August 27, 2019, online: <https://www.universityaffairs.ca/news/news-article/publishers-universities-struggle-to-provide-timely-access-to-accessible-textbooks/>.

⁷⁴ "Bursary For Students With Disabilities (BSWD) and Canada Student Grant for Services and Equipment for Persons with Permanent Disabilities (CSG-PDSE)" Government of Ontario, accessed December 3, 2019, <https://osap.gov.on.ca/OSAPPortal/en/A-ZListofAid/PRDR019233.html>.

⁷⁵ Ibid.

they are approved for and require ahead of time, and then provide receipts for reimbursement after they are approved.

Canada Student Grant for Services and Equipment for Persons with Disabilities (CSG-PDSE): The CSG-PDSE is available to students with a permanent disability to help cover some of the educational costs related to their disability. Students apply to this grant in tandem with the BSWD, and it functions in much the same way.⁷⁶ Like the BSWD, this grant is available to full- and part-time students who qualify for financial assistance. However, unlike the BSWD, this grant will cover educational costs of up to \$8,000 per year and is only available to students with permanent disabilities.⁷⁷

Canada Student Grant for Students with Permanent Disabilities (CSG-PDA): The CSG-PDA is available to students with a permanent disability who are studying full- or part-time at a post-secondary institution and who demonstrates financial need.⁷⁸ Students seeking to apply for this grant must: 1) qualify for the Canada Student Loan Program; and 2) have a permanent disability that has been defined in the Canada Student Financial Assistance Regulations (in accordance with the Canada Financial Assistance Act, 1994).⁷⁹ The grant provides help to pay for education-related costs such as tuition, books, mandatory fees, living costs and transportation. Up to \$2,000 per academic year is available and unlike the BSWD and CSG-PDSE, students receive the money upfront rather than being reimbursed after purchases have been made.⁸⁰

INADEQUATE FINANCIAL ASSISTANCE AND INCREASED COSTS

Principle: Students who experience a permanent or temporary disability should be provided access to adequate financial resources that cover the costs associated with their disability in addition to their education costs.

Principle: Students with disabilities should not have to rely on aid from private lenders to finance their post-secondary education.

Concern: The costs associated with acquiring psychological assessments are costly and can be a barrier to receiving academic accommodations.

Concern: The proportion of students living with a disability who borrow from private lenders is higher than that of students without disabilities.

Recommendation: The Ontario Human Rights Commission should create a formal definition of what is a temporary disability.

Recommendation: The Ministry of Colleges and Universities should align their definition of temporary disability with the definition created by the Ontario Human Rights Commission.

Recommendation: The provincial government should lobby the federal government to expand the eligibility criteria for federal grants and bursaries to include students with temporary disabilities.

Recommendation: The provincial government should lobby the federal government to expand the diagnostic assessment limitation under the Canada Student Grant for Persons with Disabilities to cover the costs of psychological assessments in their entirety.

⁷⁶ "Canada Student Grant For Services And Equipment For Students With Permanent Disabilities," Government of Canada, accessed December 3, 2019, <https://www.canada.ca/en/services/benefits/education/student-aid/grants-loans/disabilities-service-equipment.html>.

⁷⁷ Ibid.

⁷⁸ Ibid.

⁷⁹ Ibid.

⁸⁰ Ibid.

Recommendation: The provincial government should amend the Ontario Student Assistance Program (OSAP) eligibility requirements to ensure that students who have a temporary disability, who are taking a reduced course load, are still eligible for full-time OSAP funding when applying for financial assistance.⁸¹

Recommendation: The Ministry of Colleges and Universities should review the OSAP academic probation protocol to ensure the regulations adopt an Equity, Diversity, and Inclusion lens to student issues that arise while in post-secondary.

Recommendation: The Ministry of Colleges and Universities should amend the OSAP academic probation and restriction penalties to take into account the functional limitations and lived experience of students with a permanent or temporary disability.

The costs associated with financing one's post-secondary education has steadily been on the rise over the past decade. When factoring in those who experience a disability, and the costs associated with medications, assistive devices and support services, it can be a heavy expense for students with a disability to attend university. According to OUSA's Ontario Post-Secondary Student Survey (OPSSS) that was conducted in 2017, 44% of respondents stated that financial assistance options need improvements at their institution. With the recent changes in 2019 to the financial assistance program in Ontario, students with disabilities are increasingly struggling to pay for their education. As more students no longer qualify for financial assistance through the OSAP program, it is no longer a wholly accurate model of assessing whether or not a student is financially insecure. This, coupled with the fact that results of the 2015 Ontario Post-Secondary Student Survey showed that students with disabilities were more likely than students without disabilities to rely on bank loans or lines of credit,⁸² illustrates that receiving government support financial aid is not an indicator of a student's financial need. As a result, the provincial government should lobby the federal government to remove OSAP status as a requirement to receive the Canada Student Grant for Services and equipment for Persons with Permanent Disabilities.

In order to receive academic accommodations, depending on a student's diagnosed disability, students are required to provide a full psycho-educational assessment that is valid within the last 5 years. When reviewing the costs associated with the assessment required for accommodation, the average price is anywhere between \$1000 – \$2500 for a full psychoeducational assessment report. Between medications, assessments required for accommodation and support services needed to thrive, students with disabilities are struggling to succeed in university.

Currently, many of the programs in place to lessen the financial burden of post-secondary costs for those with a disability are directed to those who have a permanent disability. This has left students with a transient disability without adequate funding to support their post-secondary degree. When reviewing definitions for OSAP, there is no clear or formal definition as to what constitutes a temporary disability, whereas there is one for those who have a permanent disability. The challenges that both groups of students' faces can be unique, which is why the Ontario Human Rights Commission should develop a definition for temporary disability that the Ministry of Colleges and Universities should adopt to ensure all students have access to adequate funding.

When determining how best to structure their course schedule, students with a disability may choose to reduce their course load and become a part-time student. While this may not be ideal for their own academic progress, this alleviates many of the burdens they have to deal with associated with their disability. Unfortunately, when choosing to reduce their course load, students with disabilities risk being put on academic probation from OSAP. This academic probation is distinct from the academic probation of an institution and is significant in that it impacts a student's access to financial assistance through OSAP.

⁸¹ "OSAP appeal forms," University of Waterloo: Student Awards & Financial Aid, accessed February 3, 2019, <https://uwaterloo.ca/student-awards-financial-aid/forms/osap-appeal-and-review-forms> [Waterloo, "OSAP Appeal Forms"].

⁸² Marc Gurrise and Danielle Pierre, *Accessibility: Results from the 2015 Ontario Post-Secondary Student Survey*, Research Report (Toronto, ON: Ontario Undergraduate Student Alliance, 2017).

Under OSAP guidelines, students can get put on academic probation of repeatedly dropping a course, frequent course withdrawals and repeatedly having incomplete courses that limit a student's academic progress.⁸³ Unfortunately, these situations are common for students with a disability as they are more likely to have difficulty physically accessing classrooms and dealing with sporadic flare ups associated with their disability. If a student is placed on academic probation for more than one year, they are placed on academic restriction and as a result are not allowed to apply for OSAP funding for one full year. If students feel they are unjustly put on academic probation, they are able to appeal the decision made. When the appeals process occurs, the Ministry of Colleges and Universities should take into account the functional limitations and the lived experience of students with a disability when assessing their probation status. However, the stress and difficulties that are placed on a student who is unjustly put on academic probation through OSAP and then has to appeal the decision can hinder their ability to succeed academically and is an unnecessary burden on the provincial government to have to go through the appeals process. This can be prevented if the Ministry of Colleges and Universities adopts an Equity, Diversity, and Inclusion lens when reviewing the current protocol for putting students on academic accommodation that is more attentive to the various situations that may cause a student to repeatedly drop a course, frequently withdraw from study, and repeatedly have incomplete courses that limit their academic progress.

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT

Principle: The Accessibility for Ontarians with Disabilities Act (AODA) states a set of accessibility standards which organizations must abide by.

Principle: University campuses should be accessible and compliant under the AODA.

Concern: The AODA has not effectively changed the accessibility for post-secondary education in Ontario.

Concern: Less than half of organizations in Ontario are AODA-compliant.

Concern: Some post-secondary institutions have buildings that are difficult to access for students with disabilities.

Recommendation: The provincial government should work with post-secondary institutions to ensure that all existing and future buildings are compliant with the AODA and the Building Code Act.

Recommendation: The provincial government should conduct a review of current levels of AODA compliance and strengthen future iterations to compel organizations to be compliant.

Recommendation: The provincial government should use a phased approach in future iterations of the AODA.

Recommendation: The provincial government should reassess the Accessibility for Ontarians with Disabilities Act and create an updated document as to where organizations should be moving towards within the next 20 years.

The provincial government and post-secondary institutions must make great strides in reaching accessibility standards in the province. The Accessibility for Ontarians with Disabilities Act (AODA) mandates that organizations must comply by January 1st, 2025. The Third Legislative Review of the AODA noted that “progress has been painfully slow,” with some stakeholders believing that Ontario is “not on track for full inclusion by 2025.”⁸⁴ The Minister for Seniors and Accessibility, Raymond Cho, stated that

⁸³ Waterloo, “OSAP Appeal Forms”, n 81.

⁸⁴ David C. Onley, *Third Legislative Review of the Accessibility for Ontarians with Disabilities Act, 2005* (January 2019), online: <https://www.ontario.ca/page/2019-legislative-review-accessibility-ontarians-disabilities-act-2005> [Onley].

less than thirty percent of organizations in Ontario have met their obligations under the AODA.⁸⁵ The post-secondary sector shares in this lack of progress. A study conducted by researchers from Ontario institutions stated that the AODA “has had limited impact on the accessibility of teaching and learning on campus.”⁸⁶

The Legislative Review suggests that the AODA requires tougher enforcement through the establishment of a complaint mechanism and publicizing enforcement efforts.⁸⁷ The provincial government should conduct a review of current AODA compliance to determine areas in which organizations are failing to meet obligations, including where post-secondary institutions are failing to meet their obligations for students. Using a phased approach, the government should then strengthen the AODA to compel organizations to be compliant. This may take the form of fines for organizations that are found to be non-compliant.

⁸⁵ Legislative Assembly of Ontario, *Official Report of Debates (Hansard)*, no. 91 (1st Session, 42nd Parliament, April 10, 2019), online: https://www.ola.org/sites/default/files/node-files/hansard/document/pdf/2019/2019-04/10-APR-2019_Log91.pdf.

⁸⁶ Elizabeth Marquis, Ann Fudge Schormans, Bonny Jung, Christina Vietinghoff, Robert Wilton and Susan Baptiste, “Charting the Landscape of Accessible Education for Post-secondary Students with Disabilities,” *Canadian Journal of Disability Studies* 5, no. 2 (June 2016), 42-71, online: <https://cjds.uwaterloo.ca/index.php/cjds/article/view/272>.

⁸⁷ Onley, n 84.

CONCLUSION

Little has changed since this policy paper was last revised in 2016. Students with disabilities continue to face unnecessary barriers to accessing post-secondary education, and many willing and qualified students are therefore not transitioning into post-secondary, or able to complete it and transition into employment when they do. The recommendations in this policy paper provide the provincial government with concrete steps that they can take to ensure that the post-secondary landscape is one that is accessible and provides adequate accommodations for students with disabilities so that they can excel on par with their peers. The Ministry of Colleges and Universities can be consistent with the Report's recommendations by introducing an accessibility clause in Strategic Mandate Agreements (SMA). With SMA2 expiring and the newest set of SMAs slated to introduce greater ties to performance-based outcomes, now is the most appropriate time to introduce this change.

Reports state that SMA3 will include metrics such as graduation rates and graduate employment amongst its performance metrics.⁸⁸ Students with disabilities are less likely to graduate,⁸⁹ and those who do graduate are more likely to be unemployed two years after graduation.⁹⁰ Including a clause that ties AODA compliance to funding adheres to the AODA's "all-of-government" approach while simultaneously ensures that universities create accessible environments for all students.

There is much work to be done to create an accessible post-secondary landscape, and all stakeholders should work together using all possible tools to ensure that no student is barred from participating due to accessibility limitations or lack of access to accommodations.

⁸⁸ Joe Friesen, "New metrics for Ontario university and college funding include employment and graduation rates," *The Globe and Mail*, April 16, 2019, <https://www.theglobeandmail.com/canada/article-new-metrics-for-ontario-university-and-college-funding-include/>.

⁸⁹ Fullarton & Duquette, n 68.

⁹⁰ David Zarifa, David Walters, and Brad Seward, "The Earnings and Employment Outcomes of the 2005 Cohort of Canadian Postsecondary Graduates with Disabilities," *Canadian Review of Sociology* 54, no. 2 (2015): 343-376.

POLICY STATEMENT

Whereas: Student leaders, teaching assistants, instructors and staff should be provided with the knowledge and resources needed to make their campus environment accessible for all students.

Whereas: Students with a disability should not have to go out of their way to find an available parking space on campus.

Whereas: Students with a disability should be given the resources to alleviate barriers in traveling to, from, and around campus.

Whereas: University campus infrastructure should be accessible for all students.

Whereas: Students with disabilities should be able to navigate campus easily.

Whereas: Information on the accessibility of classrooms and buildings should be transparent and available online to students.

Whereas: All students should have access to washrooms on campus that meet their needs.

Whereas: Accurate information on campus support services should be available and publicized to all prospective students with disabilities throughout the registration process as well as to current students during course registration.

Whereas: Information on disability accommodation requirements must be provided to students prior to the start of each academic year, to ensure that students have enough time to have the necessary assessments completed.

Whereas: All students should be introduced to accommodation and accessibility services to normalize the process of accessing services. Any student could experience a temporary disability and should be equipped with the knowledge of where to go and what to do in the event of.

Whereas: All programs should be accessible.

Whereas: All high school students should have adequate information about academic accommodations and accessibility resources to inform their decision-making process prior to entering post-secondary education.

Whereas: All students should have equal access to information about accessibility and disability services, accommodation requirements, and disclosure as part of secondary to post-secondary summer transition services.

Whereas: Incorporating accessibility into summer transition programming helps reduce the stigma around disabilities by raising awareness within post-secondary institutions.

Whereas: Students should have autonomy to choose the summer transition program that best suits their needs.

Whereas: The opportunity to participate in the workforce after the completion of post-secondary must reflect the fact that all students have different functional limitations.

Whereas: Institutions should be equipped to accommodate the needs of students with disabilities to the point of undue hardship.

Whereas: Students have unique needs and access to varying levels of accommodation is crucial for academic achievement.

Whereas: Students with disabilities should be able to easily understand the different and required processes for registration at accessibility offices.

Whereas: In the event of a dispute with accessibility services, students should have an independent arbitrator assess how accommodations can be provided.

Whereas: Students with disabilities have unique needs and intersecting identities that mental health counselling should take into consideration.

Whereas: Mental health services should be easily accessible to persons with disabilities.

Whereas: Mental health services are often part of the primary care mechanisms for persons with psychosocial disabilities.

Whereas: Access to assistive technologies through various institutional departments is critical to students' success.

Whereas: Institutions should cover the costs of accommodations for students such as assistive technologies when the accommodations are used for post-secondary curriculums.

Whereas: Post-secondary accessibility offices should have enough money to support every registered student with a disability.

Whereas: Peer support services are effective in helping students with disabilities succeed.

Whereas: Accommodations must be made for all students with disabilities who require them, as is consistent with the Ontario Human Rights Code.

Whereas: Documentation requirements should be consistent for all post-secondary students seeking academic accommodations.

Whereas: Any documentation on which accommodations are based need not disclose any specific diagnosis but should instead be used to discern functional limitations.

Whereas: Province-wide mental health documentation standards should be equally and consistently enforced, as is the standard for all other areas of province-wide documentation.

Whereas: Accessibility offices should lead the organization of accommodations for students with disabilities, all universities should make accommodating students with disabilities a priority.

Whereas: Academic accommodations for students with disabilities should be consistent, reliable, and easily accessible.

Whereas: Students should have a safe environment throughout the process of seeking accommodations.

Whereas: Institutions should adequately inform students with disabilities about the range of accessibility services available to them.

Whereas: Academic accommodations should be implemented in a manner that accounts for academic dates and course schedules.

Whereas: Students who experience a permanent or temporary disability should be provided access to adequate financial resources that cover the costs associated with their disability in addition to their education costs.

Whereas: Students with disabilities should not have to rely on aid from private lenders to finance their post-secondary education.

Whereas: The Accessibility for Ontarians with Disabilities Act states a set of accessibility standards which organizations must abide by.

Whereas: University campuses should be accessible and compliant under the Accessibility for Ontarians with Disabilities Act.

Be it resolved that: The Ministry of Colleges and Universities should task the Higher Education Quality Council of Ontario to develop a comprehensive Accessible Education Training best practices guideline for all faculty, front line staff, and student leaders to help remove barriers for teaching and learning for students with disabilities.

Be it further resolved that (BIFRT): The provincial government should amend the Occupational Health and Safety Act to include that all volunteer positions that will interact with individuals with a disability be required to complete Accessibility for Ontarians with Disabilities Act (AODA) training.

BIFRT: The Ministry of Colleges and Universities should partner with The Council of Ontario Universities and the Ontario Confederation of University Faculty Associations to develop a set of modules for faculty on disability accommodations and ways to incorporate universal design for teaching and learning into their classrooms.

BIFRT: The provincial government should work with the Ontario Confederation of University Faculty Associations to ensure they provide their members with standardized training and best practices based on regularly updated research for accommodating students with disabilities.

BIFRT: The provincial government should allocate capital funds to universities who are specifically looking to modify existing or create new accessible parking spots on campus.

BIFRT: The provincial government should amend section 80.33 of the Accessibility for Ontarians with Disabilities Act to require post-secondary institutions with multiple off-street parking facilities to evenly distribute accessible parking spaces on campus, taking into account the utilization of the buildings the parking lots are in close proximity to.

BIFRT: The provincial government should provide envelope funding to institutions to retrofit existing, and encourage the redesign of older, infrastructure to comply with and go beyond Accessibility for Ontarians with Disabilities Act standards.

BIFRT: The Ministry of Colleges and Universities should mandate that every post-secondary institution have information on the accessibility of every building and classroom on campus on their website, that is easy to find and transparent for students.

BIFRT: The provincial government should provide envelope funding to universities' deferred maintenance budgets for the implementation of repairs and enhancements to campus pathways, classrooms, and buildings that specifically work to increase the overall accessibility of campus for students with disabilities.

BIFRT: The Ministry of Colleges and Universities should encourage post-secondary institutions, when undergoing renovations or building new infrastructure on campus, to go above and beyond AODA standards to ensure they are accommodating for the diverse needs of students with a disability.

BIFRT: The provincial government should provide institutions with envelope funding to increase the number of barrier-free/universal washrooms on university campuses.

BIFRT: The Ministry of Colleges and Universities should encourage institutions to ensure that when new buildings are being created washrooms are in an accessible location with clear signage so students are informed on where to go.

BIFRT: The Ministry of Education, in consultation with the Ministry of Colleges and Universities, should amend the secondary school curriculum to provide high school students with knowledge of assessment and documentation requirements for academic and employment accommodations.

BIFRT: The Ministry of Colleges and Universities should be tasked with helping students navigate the process of getting medically recognized and emphasize the value of interim documentation of functional limitations that aid students in recognizing that they might have a disability and qualify for aid.

BIFRT: The Ministry of Colleges and Universities should work in conjunction with the Ministry of Education to inform high school students that some demanding programs can still be accommodated at the post-secondary level.

BIFRT: The provincial government should require general summer transition programs supported by government funding to integrate information on accessibility services and accommodation for all students. The funding should be provided to institutional accessibility services or equivalents as well as other institutional organizations involved in transition programming.

BIFRT: The Ministry of Colleges and Universities should mandate that all universities make specific summer transition services available for incoming students with disabilities.

BIFRT: The provincial government should task the Higher Education Quality Council of Ontario with researching best practices for transition programs and support services for students with disabilities based on findings from the *Transitions* Longitudinal Study as well as additional research to ensure consistency across institutions.

BIFRT: The Ministry of Colleges and Universities should partner with post-secondary institutions and businesses to increase work integrated learning opportunities that are equally available to students with disabilities to meet the current student demand.

BIFRT: Employment Ontario should expand upon existing incentives to hire youth by adding combined disability youth incentives and support similar to those offered by the Ontario Disability Support Program: Employment Supports.

BIFRT: The provincial government should provide funding to institutions for the training of an existing career consultant or a career consultant specifically dedicated to supporting students with disabilities transition into the workforce.

BIFRT: The provincial government should make work integrated learning opportunities, including research grants, available for students with disabilities.

BIFRT: The provincial government should provide funding to the Inter-university Disability Issues Association to conduct research on standards of practice for post-secondary institutions to provide supports to students with disabilities.

BIFRT: The provincial government should work with the Inter-university Disability Issues Association to develop standard documentation for admissions applications and verifying students' disabilities.

BIFRT: The Ministry of Colleges and Universities should task the Higher Education Quality Council of Ontario with creating a standard to evaluate the effectiveness of accessibility services at post-secondary institutions.

BIFRT: The Ministry of Colleges and Universities should mandate that institutions have an independent body such as an ombuds office or similar role to review complaints about accessibility services.

BIFRT: The Ontario Human Rights Commission should create a formal definition or develop a definition of disability that describes individuals with functional limitations that are expected to persist, but not necessarily for their whole life.

BIFRT: The Ministry of Health and Long-Term Care should develop best practices for a "whole of community approach" that supports comprehensive and accessible mental health services for students with disabilities.

BIFRT: The provincial government should provide additional envelope funding through the Accessibility Fund for Students with Disabilities for post-secondary institutions to secure assistive technologies for students.

BIFRT: The provincial government should provide funding for institutions to supply and cover the costs of assistive technologies on behalf of students.

BIFRT: The Ministry of Colleges and Universities should include the total number of students when calculating how much funding accessibility offices receive, not just the number of students pursuing a degree.

BIFRT: The provincial government should provide additional envelope funding through the Accessibility Fund for Students with Disabilities for additional accessibility support services.

BIFRT: The provincial government should task the Higher Education Quality Council of Ontario to develop a standard for the appropriate amount of funding for accessibility offices.

BIFRT: The provincial government must mandate that universities adopt a consistent and systematic review process of their academic accommodations policy every five years to ensure that the policy remains relevant and up to date.

BIFRT: The government should task the Higher Education Quality Council of Ontario with conducting adequate and timely review of province-wide documentation standards in the area of mental health for post-secondary students.

BIFRT: The provincial government should task the Higher Education Quality Council of Ontario with conducting a review of the current standards on disability documentation resubmission to ensure that standards are not unduly burdensome on students with differing ranges or types of disabilities.

BIFRT: The provincial government should conduct an extensive review of existing academic accommodation standards at Ontario universities to assess the adequacy of the range of accommodations provided.

BIFRT: The provincial government should mandate that the standards and guidelines for province-wide documentation are being enforced equitably across all institutions.

BIFRT: The provincial government should mandate that province-wide documentation standards do not require students with registered permanent disabilities to seek additional forms of documentation, such as doctor's notes.

BIFRT: The provincial government should expand the Ontario Health Insurance Program coverage to include the cost of doctor's notes and medical notes.

BIFRT: The provincial government should task the Higher Education Quality Council of Ontario with reviewing the assessment requirements for students seeking academic accommodations based on a learning disability and/or ADHD to ensure that these requirements do not cause undue hardship on students.

BIFRT: The provincial government should mandate that universities' accommodation policies are aligned with the Ontario Human Rights Commission's *Policy on accessible education for students with disabilities* to ensure that accommodations are provided to students in a manner that complements the regular academic dates and course sessions.

BIFRT: The provincial government should mandate that a standardized interim accommodation process be implemented across all institutions so that all students with disabilities have access to the same level of interim accommodations and support.

BIFRT: The provincial government should direct the Higher Education Quality Council of Ontario to investigate best practices in academic accommodation processes to be adopted by University accessibility services.

BIFRT: The provincial government should mandate that accessibility services utilize the best practices provided by the Higher Education Quality Council of Ontario in the training of instructors and staff on how to best facilitate academic accommodations.

BIFRT: The Ontario Human Rights Commission should create a formal definition of what is a temporary disability.

BIFRT: The Ministry of Colleges and Universities should align their definition of temporary disability with the definition created by the Ontario Human Rights Commission.

BIFRT: The provincial government should lobby the federal government to expand the eligibility criteria for federal grants and bursaries to include students with temporary disabilities.

BIFRT: The provincial government should lobby the federal government to expand the diagnostic assessment limitation under the Canada Student Grant for Persons with Disabilities to cover the costs of psychological assessments in their entirety.

BIFRT: The provincial government should amend the Ontario Student Assistance Program (OSAP) eligibility requirements to ensure that students who have a temporary disability, who are taking a reduced course load, are still eligible for full-time OSAP funding when applying for financial assistance.

BIFRT: The Ministry of Colleges and Universities should review the OSAP academic probation protocol to ensure the regulations adopt an Equity, Diversity, and Inclusion lens to student issues that arise while in post-secondary.

BIFRT: The Ministry of Colleges and Universities should amend the OSAP academic probation and restriction penalties to take into account the functional limitations and lived experience of students with a permanent or temporary disability.

BIFRT: The provincial government should work with post-secondary institutions to ensure that all existing and future buildings are compliant with the Accessibility for Ontarians with Disabilities Act and the Building Code Act.

BIFRT: The provincial government should conduct a review of current levels of Accessibility for Ontarians with Disabilities Act compliance and strengthen future iterations to compel organizations to be compliant.

BIFRT: The provincial government should use a phased approach in future iterations of the Accessibility for Ontarians with Disabilities Act.

BIFRT: The provincial government should reassess the Accessibility for Ontarians with Disabilities Act and create an updated document as to where organizations should be moving towards within the next 20 years.