

October 4, 2021

**Re: OUSA provides feedback on the initial recommendations for proposed postsecondary accessibility standards**

To the Postsecondary Education Standards Development Committee:

On behalf of 150,000 professional and undergraduate students in Ontario, the Ontario Undergraduate Student Alliance (OUSA) is writing to provide feedback on the recommendations for proposed post-secondary accessibility standards. OUSA believes that all willing and qualified students should have access to affordable, accountable, and high quality education in Ontario, a principle that extends to all students, including those with suspected or documented disabilities.

As stated in the letter from the Chair to the Minister, the COVID-19 pandemic has forced us to reckon with accessibility barriers that limit participation in post-secondary education across our province. These barriers were not new – many students with disabilities have long faced barriers to accessing, persisting, and excelling in higher education – but were hidden to many as a result of systemic ableism and a devaluing of accessibility as essential to a socially just and inclusive society.

The pandemic has shown us that we can increase accessibility overall and provide accommodations for students based on their individual needs. It has taught us that a new “normal” is possible where innovation and flexibility are exercised to promote inclusion and welcoming for all. OUSA agrees that as we move forward, we cannot ignore the lessons we’ve learned and return to a system that fails to address the barriers that limits participation in post-secondary education for disabled students.

Prior to the pandemic, students have voiced concern that the *Accessibility for Ontarians with Disabilities Act* has been ineffective in increasing accessibility in post-secondary education, in part due to a gap in standards specifically targeting this sector, and the belief that access and accommodations are at odds with rigour, academic integrity, and meaningful learning.

While OUSA is pleased with the proposed standards overall, the following submission highlights important gaps that could be addressed as they are finalized, as well as the recommendations that will be particularly impactful for students.

In summary, OUSA would like to see the following changes be integrated into the proposed standards:

- Add recommendations on increasing the number of work-integrated learning opportunities for disabled students.
- Require decision-making groups to release a formal statement which explicitly recognizes the value of student voices and outlines options for recourse in the event of tokenization.
- Expand any recommendations about employee trainings to include student leaders and volunteers.
- Ensure institutional accountability measures are in place to increase transparency on the progress of recommendation implementation.
- Amend recommendation 116 to ask that funding for accessibility supports comes from the provincial government rather than student governments.
- Include recommendations that would increase disability studies in course content and academic programs.

## SUGGESTIONS FOR IMPROVEMENT

While there are several recommendations that account for easier transition to work-integrated learning opportunities for students with disabilities, we would like to flag a gap in recommendations intended to increase work-integrated learning opportunities. We know that work-integrated learning is an important tool students use to open pathways to the workforce, so while the quality of these opportunities is critical, without a sufficient quantity of opportunities disabled students will continue to have limited access to these pathways. To address this gap, we suggest that recommendation(s) be added to increase work-integrated learning opportunities for students with disabilities in particular. Some examples could be:

- the Ministry of Colleges and Universities partnering with post-secondary institutions and businesses to increase work-integrated learning opportunities that are equally available to disabled students;
- expanding upon existing incentives to hire youth through Employment Ontario by adding combined disability youth incentives and support similar to those offered by the Ontario Disability Support Program: Employment Supports; and
- making work-integrated learning opportunities, including research grants, available for students with disabilities.

OUSA is thankful for recommendations that will ensure the inclusion of disabled students in leadership or decision-making roles, although we are concerned that without a commitment to ensuring that student voices are respected and accompanying accountability measures, that these students may be marginalized in their positions within these committees. To address this concern, we suggest that there be a requirement for any committee, taskforce, or other decision-making space to have a formal statement that explicitly recognizes the value and importance of student voices in decision-making spaces and that there be a clearly articulated and accessible process for student representatives to access to receive support and/or recourse should they experience tokenization in their roles.

One gap that OUSA would like to see addressed in the recommendations is the inclusion of student leaders when delineating to whom a recommendation will apply. Specifically, wherever training for employees is recommended, we would like to see student groups, unions, associations, and societies as many of these student leaders act in volunteer positions and therefore do not fall under the umbrella of “employees,” although they often perform duties and interact with students in roles that are comparable to many staff positions that have a role to play in creating an accessible campus environment beyond program delivery (Recommendation 20).

One of the concerns we have heard with the *Accessibility for Ontarians with Disabilities Act* and existing Integrated Standards is that there are no clear and accessible pathways to holding institutions accountable to meeting their requirements, despite clear timelines for implementation. We are concerned that this is also a gap in the proposed recommendations. Specifically, where a post-secondary institution is required to implement a plan or strategy (e.g., Recommendation 7 requiring the creation of a change management strategy) we would like to see accountability measures put in place with clear and accessible avenues for students to report non-compliance or lack of progress.

While we believe that accessibility supports, such as sign language interpreting and attendant services, should be made available for students with disabilities to enable their access and participation in non-academic campus life activities that are sponsored by the student governments and student groups, we are concerned that funding for these services and supports is being asked from student governments and societies (Recommendation 116). Funding for student governments and societies come from the larger student body and students-at-large are facing increasing financial barriers. We would therefore like to see this recommendation be amended to ask that funding come from the provincial government.

We would also like to flag a gap in the post-secondary sector more broadly, namely the lack of course content or programs in disability studies. We believe that an important part of making post-secondary education, and our broader society, more accessible is providing all students with opportunities to educate themselves and think critically about disability. These standards are a unique opportunity to spark conversation and inspire action in support of disability studies programs and courses across the province.

## IMPACTFUL RECOMMENDATIONS

OUSA is thankful for the recommendations that include students with disabilities in decision-making roles. Disabled students are experts in their needs and are often excluded from decision-making spaces, but OUSA believes that building a fair and equitable system requires input from those who have personally navigated it, and thus have an intimate understanding of its shortcomings and their impact.

OUSA is also pleased to see recommendations throughout the proposed standards report that support transparency and access to information. These are important to hold both the government and post-secondary institutions accountable for meeting their commitments under the standard. Additionally, OUSA commends the recommendations that address inequities in teaching and learning. Seeking accommodation approvals has been a long-standing physical, emotional and mental barrier for students with disabilities; adjustments to pedagogies/andragogies (including greater integration of online and/or blended learning models) as well as assessing these in quality assurance processes will provide a more beneficial educational experience for this group.

OUSA appreciates the recommendations that address ableist attitudes, behaviours, perceptions, assumptions and systems because this is the foundation for the enactment and perpetuation of many of the barriers faced by students with disabilities – through the dedication of infrastructure/resources, training for professionals at all levels, and incorporating an accessibility lens in policy development, these measures align closely with previous calls to action from students on this issue. Lastly, OUSA is appreciative of all recommendations which address financial barriers because post-secondary education is already costly, and being a disabled student can add additional expenses – these finance-related recommendations will make the cost of post-secondary education more equitable.

Overall, there are several recommendations that comprehensively address the needs of disabled students and aim to make post-secondary education a more equitable and accessible space for all.

#### RECOMMENDATIONS FOR THE ONTARIO GOVERNMENT

OUSA is thankful for the work of the Postsecondary Education Standards Development Committee, and we echo their calls for a broad and timely implementation of the recommendations so that barriers to access, belonging, and participation do not continue to hinder the success of students with disabilities.

OUSA also asks that the provincial government consider releasing a plan for accountability that institutions will be required to follow as they implement the recommendations in this report. It is important that institutions be transparent and publicly communicate the measures they are taking to meet the proposed standards, who is involved in decision-making processes, the funding allocated to various projects, and their progress in implementation, including regularly updated timelines for completion.

Importantly, much of this work requires adequate financial support and therefore OUSA asks that the provincial government demonstrate their commitment to supporting students with disabilities and accessible post-secondary education by providing funding for institutions and students to help meet the goals of the post-secondary education accessibility standards.

OUSA is pleased that steps are being taken to address this gap and is thankful for the work of the Postsecondary Education Standards Development Committee and the opportunity to share a student perspective on the proposed standards. We are hopeful that these standards will serve as a foundation to apply lessons learned from the pandemic and dismantle barriers that have for too long hindered disability inclusion and access to post-secondary education.

Regards,

Ontario Undergraduate Student Alliance (OUSA)