



POLICY PAPER

Student Accessibility and Disability Inclusion

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ABOUT OUSA

OUSA represents the interests of 160,000 professional and undergraduate, full-time and part-time university students at nine 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 the 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, Anishinaabek, and Mississauga Peoples.

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OUSA policy papers are written by students to articulate student concerns and offer student-driven solutions for accessible, affordable, accountable, and high quality post-secondary education in the province.

To support our policies and ensure that we are effectively representing undergraduate and professional students at Ontario's universities, students and student groups from each of our eight member institutions were consulted to provide guidance and feedback on the principles, concerns, and recommendations contained herein.

OUSA would like to thank students and student groups from Brock University, Laurentian University, McMaster University, Queen's University, Trent University Durham GTA, the University of Waterloo, Western University, and Wilfrid Laurier University for their valuable contributions to this policy paper.

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EXECUTIVE SUMMARY

OUSA believes all willing and academically qualified students should be able to access post-secondary education in Ontario. However, students with disabilities, both visible and invisible, face barriers to furthering their education and meaningfully engaging with their institutional communities due to the lack of accessibility and accommodations that exists on many campuses. This practice negatively impacts their post-secondary engagement and persistence. OUSA believes that the Ministry of Colleges and Universities can work alongside Ontario universities to create more accessible and equitable campuses to ensure the participation of all attending students.

THE PROBLEM

Isolating Campus Environments

Students are concerned with the understanding of disabilities on campus. Students attending post-secondary institutions have limited knowledge of disability in accessibility, mostly citing learning disabilities, mobility, and sensory impairments, with a relatively small percentage indicating mental health disabilities. The lack of awareness creates a stigma for students navigating post-secondary education. Students who come from cultural backgrounds in which disability is considered taboo are also navigating internalized fear or social stigma when they seek out support services or treatment.

The knowledge deficit surrounding disability extends to university staff and volunteers. Although AODA training is mandated by law, student workers and volunteers often must be directed to complete AODA training. Despite AODA mandates for any employed individual in Ontario, there is a lack of post-secondary tailored training for instructors, staff and teaching assistants. Additionally, a deficit in AODA-related knowledge among university administration and staff contributes to non-compliance and ableism in classrooms and administrative settings.

Students are worried about the physical barriers for students with disabilities on their campuses. There is a lack of accessible parking on university campuses. At some institutions, students may incur additional costs for accessible parking, creating an additional financial burden on students with disabilities. In addition, a lack of accessible parking can impede students with disabilities from fully participating in campus life due to longer travel times and inaccessible routes from the nearest accessible parking.

Aging and existing accessibility infrastructure within post-secondary institutions are poorly maintained, creating accessibility barriers. Institutions often offset accessibility ramps from main entrances, making navigating buildings and traversing campus efficiently difficult for students with mobility devices. Further accessibility barriers include a lack of automatic door openers and the lack of signage for accessible pathways. Additionally, visually impaired students are often underserved on university campuses due to the lack of visual aids.

Students are concerned about the inaccessibility of washrooms for students with disabilities. The location of barrier-free washrooms is often farther away from general spaces and difficult to access. For visually impaired students they may not and often do not have access to the appropriate signage in on-campus washrooms.

Barriers to Transition

Students are concerned about incoming student transition into post-secondary education. Students are often unaware that they must provide annual documentation for renewal of accommodations before the start of courses. Without adequate 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. Beyond accessing accommodations, there are also access barriers for welcome programming. Not all orientations are designed with accessibility in mind, excluding students with disabilities from important campus integration activities.

Summer transition programs are another facet of students' introduction to post-secondary, wherein the access barriers, such as unmet accommodation requirements, hinder student participation. While they are meant to inform students of what to expect during in school year, generalized summer transition programs insufficiently address and inform on accessibility services and supports. The information provided to students in summer transition programming regarding accessibility services varies across institutions, with little to no effort to ensure students are accurately informed across the province.

Students are also concerned about the support for students with disabilities as they transition from post-secondary education into the workforce. Students with disabilities do not have sufficient opportunities to build their expertise and career-related experience before graduating from post-secondary. When students try to gain work experience during their undergraduate degrees, they face additional challenges when navigating ODSP and wages. Recipients of ODSP are at risk of a reduction or suspension of their funding if they earn more than \$1000 per month. This tends to limit students' ability to engage in meaningful work opportunities. Students with disabilities also face barriers when acquiring employment. Students with visible disabilities face barriers early on in the job process. Those with invisible disabilities face an additional barrier to obtaining employment, given the limited knowledge of how, when, or if to disclose a disability to a potential employer. In instances where students with disabilities do acquire work, they are often not provided with the appropriate accommodations by their employers. As a result, they regularly have to pay out of pocket to make their workplaces accessible to them. This financial burden extends to student staff at institutions that often lack the funding to provide the accommodations necessary for those with physical support needs.

Ineffective Support Services

Students are concerned about the quality of support services available to students with disabilities. There are many barriers that students with disabilities must navigate when trying to access accommodations. Accommodation of students with disabilities at the post-secondary level is not subject to the same detailed legislative structures as at the primary and secondary levels. As a result, there is a lack of standardization for accommodations across the province. Documentation requirement variation between post-secondary institutions makes the post-secondary application process for disability-related accommodations challenging to understand. This may limit students' choice of post-secondary institution because they do not have the resources to obtain the required documentation for academic accommodations at their preferred school. When admitted, students may encounter barriers in receiving adequate accommodations for their disabilities due to the inadequate cohesion related to disability policy. 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 to a student's career at a post-secondary institution. Once students acquire accommodations, faculty and staff may not have the proper training or resources to implement academic accommodations. If students encounter barriers to having their accommodations met, not all institutions hold an independent review process for appeals for accommodations, creating obstacles in the dispute process. While some of these barriers could be remedied through improvements in teaching practices across the province, it is difficult to actualize this across all 23 publicly funded institutions. 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.

In addition, students are concerned about funding for accessibility services. The province determines accessibility funding by the number of students registered with accessibility services; however, this practice does not encompass all students. The Ministry of Colleges and Universities excludes students registered with accessibility offices pursuing certificates rather than degrees when determining the funding for accessibility departments. This practice raises issues when schools try to provide students with accessible resources. Many post-secondary institutions may not have sufficient funds for assistive technologies. Assistive technologies are often expensive and inaccessible for individual students with disabilities to purchase.

Barriers to Academic Accommodations

Students are worried about the barriers associated with providing documentation for accommodations. Accommodation policies and their implementation vary across institutions, which creates inequities for students with disabilities attempting to access accommodations. The standards surrounding the resubmission of disability documentation may place undue pressure and hardship on students seeking accommodations. Students often face difficulties attaining required documents, such as doctors' notes, necessary for academic accommodations. Additionally, the province review processes for province-wide documentation standards in mental health are inadequate and slow. Due to the lack of consistent review, many policies remain outdated and ill-suited to meet student concerns. Further, institutions may not recognize or understand all disabilities and associated functional limitations and may be unable to provide the necessary academic accommodations.

Students are concerned about administrative processes associated with academic accommodations. Students often experience barriers when seeking access to the academic accommodations they need to reach their full potential of achieving success within a post-secondary institution. Students do not receive interim accommodation support during the registration process for academic accommodations. Delays in implementing academic accommodations can severely impact a student's ability to participate academically. Students with disabilities are more likely to face academic strain, which may be further exacerbated when navigating university processes. Streamlining university processes could mitigate these issues. However, students are often not provided with the necessary, timely, and/or adequate information regarding the different academic accommodations available.

Financial Barriers

Students are concerned about the financial inequity faced by many students with disabilities. Students with disabilities on ODSP face many challenges when accessing student financial aid. Students on ODSP do not typically receive enough OSAP to cover residence costs and other costs associated with post-secondary education. There are communication gaps for the eligibility of OSAP and ODSP for students who are eligible for both programs, which can result in students who may be ineligible to apply for OSAP along with ODSP. Students with disabilities also face barriers institutionally in accessing financial support. The costs of acquiring psychological, physiological, and advanced testing assessments are costly and can be a barrier to receiving academic accommodations. As well, some disabilities are inconsistently defined across Ontario institutions, preventing some students from being able to access intended financial support. Further, a student's physical and mental accessibility needs may lead to financial burdens when pursuing post-secondary education.

Transit Inaccessibility

Students are worried about the accessibility of transit in and around their campuses. Students with disabilities at post-secondary institutions face physical and financial barriers that create obstacles to accessing academic, social, or cultural environments on campuses. These concerns are exacerbated as the seasons change as post-secondary institution infrastructure is limited in accessibility design and seasonal insight posing significant transportation barriers for students.

RECOMMENDATIONS

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

Improving Campus Environments

To ensure students are not faced with social exclusion and stigma on campus from university staff, the Ministry of Colleges and Universities (MCU) should collaborate with the Ministry for Seniors and Accessibility and students with disabilities to create standardized accessibility training based on the Post-secondary Education Standards Development Committee 2022 Final Recommendations Report. Within this training, the MCU should ensure that the post-secondary it is intersectional and aims to address the

additional barriers racialized and other marginalized people with disabilities may face. Additionally, the MCU should mandate that institutions administer comprehensive and intuitive post-secondary-specific AODA training to all staff, student staff, and volunteers. To facilitate institutional cohesion, the provincial government should mandate that all institutions have an advisory committee dedicated to campus accessibility and require that it includes students with disabilities, university personnel, and university stakeholders. To ensure accessibility is considered at the classroom level, MCU 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 guidelines for incorporation of universal design for teaching and learning into their classrooms.

To improve parking accessibility, the Ministry of Colleges and Universities should mandate all post-secondary institutions to provide universal parking passes for students with disabilities. The provincial government should also allocate capital funds to universities specifically looking to modify existing or create new accessible parking spots on campus. Further, 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 distribute accessible parking spaces on campus evenly, considering the utilization of the buildings the parking lots are near.

Students ask that the Ministry of Colleges and Universities provide envelope funding to institutions to retrofit existing and encourage redesigning older infrastructure to comply with and go beyond Accessibility for Ontarians with Disabilities Act (AODA) standards. The Ministry of Colleges and Universities should mandate that all physical signs, including automatic door openers, include braille. The provincial government should also 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.

To improve washroom accessibility, students recommend that the Ministry of Colleges and Universities provide envelope funding to universities to equip washrooms with accessibility aids to increase the availability of aids such as ceiling lifts and braille signage. In addition, the provincial government should provide institutions with envelope funding to increase the number of barrier-free washrooms on university campuses.

Supporting Transitions

To support students' transition into post-secondary, the Ministry of Colleges and Universities should develop guiding principles for institutions to enact concerning the documentation process of receiving support. The Ministry of Colleges and Universities should also create a best practices guideline for institutions on creating fully accessible orientation weeks.

To make summer transition programs more accessible, 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, equivalents, and other institutional organizations involved in transition programming. The Ministry of Colleges and Universities should also mandate that all universities make specific summer transition services available for incoming students with disabilities.

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 and additional research to ensure consistency across institutions.

Students ask the Ministry of Colleges and Universities to make transitions into employment for students with disabilities by providing institutions funding to ensure all on-campus student employment opportunities are accessible to students with disabilities. 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.

In addition, 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. Further, the provincial government should provide funding to institutions to train an existing career consultant or a career consultant specifically dedicated to supporting students with disabilities transition into the workforce.

Strengthening Support Services

To make support services more accessible, the provincial government should provide funding to the IDIA to conduct research on standards of practice for post-secondary institutions to provide supports for students with disabilities. The provincial government should work with the IDIA to develop standard documentation for admissions applications and verify students' disabilities. The Ministry of Colleges and Universities (MCU) should also task the Higher Education Quality Council of Ontario with creating a standard to evaluate the effectiveness of accessibility services at post-secondary institutions. The MCU should mandate that institutions have an independent body, such as an ombuds office or similar role, to review complaints about accessibility services.

The Ontario Human Rights Commission should develop a formal definition of disability that describes individuals with functional limitations that are expected to persist, but not necessarily for their whole life. The province should also mandate that all campuses have a virtual accessibility hub that provides students with support systems and resources to ensure they excel during their university careers. In addition, the province should give institutions funding for universities to have their own attendant program. The Ministry of Colleges and Universities should create a best practices guideline on confidentiality and staff compliance with the Code of Disability Policy.

To improve mental health accessibility, the Ministry of Mental Health and Addiction and The Ministry of College Universities should collaborate to develop best practices for a whole-of-community approach that supports comprehensive and accessible mental health services for students with disabilities. The Ministry of Colleges and Universities should also provide post-secondary institutions with annual funding for counselling services and resources to address the growing need for more mental health support. Further, the Ministry of Colleges and Universities and The Ministry of Mental Health and Addictions should collaborate to develop a strategy to increase support for students with emerging mental health disabilities, particularly in communities with a large young adult population (such as communities near post-secondary institutions).

Students ask that the provincial government provide additional envelope funding through the Accessibility Fund for Students with Disabilities for post-secondary institutions to secure assistive technologies for students. The Ministry of Colleges and Universities should also modify the accessibility funding model to reflect the total student population rather than only students with disabilities. In addition, the provincial government should provide additional envelope funding through the Accessibility Fund for Students with Disabilities for other accessibility support services.

Improving Academic Accommodations

To ensure academic accommodations are consistently equitable, students ask the provincial government to 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 current.

As documentation is an essential step in acquiring accommodations, students recommend the government task the Higher Education Quality Council of Ontario with conducting a review of province-wide documentation standards across institutions in mental health. The provincial government should extensively review existing academic accommodation standards at Ontario universities to assess the adequacy of the range of accommodations provided. In addition, the provincial government should mandate that province-wide documentation standards do not require students with registered permanent disabilities to seek additional forms of documentation.

OUSA also recommends the provincial government expand the Ontario Health Insurance Program and University Health Insurance Plan coverage to include the cost of documentation for international and out-of-province students. The provincial government should task the Higher Education Quality Council of Ontario with reviewing the assessment requirements for students seeking academic accommodations to ensure that these requirements do not cause undue hardship to students.

To improve the academic accommodation processes, OUSA recommends the provincial government mandate for post-secondary institutions to sufficiently communicate with and inform students about the range of accessibility services available. The provincial government should also create a set of guiding standardized principles for an interim accommodation process so all students with disabilities can access the same level of interim accommodations and support. Additionally, 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. The provincial government should utilize best practices provided by HEQCO to mandate the training of instructors and staff on how to best facilitate academic accommodations. Further, the provincial government should require universities to disclose support systems on their website in easily accessible formats.

Addressing Financial Barriers

To make the financial aid process more equitable, students recommend that the provincial government allow all ODSP recipients to qualify for OSAP. The Ministry of Colleges and Universities should amend OSAP criteria to ensure that students with temporary disabilities can access federal funding. The provincial government should also 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. Further, the Ministry of Colleges and Universities should amend the OSAP academic probation and restriction penalties to consider the functional limitations and lived experience of students with permanent or temporary disabilities.

Improving Transit Accessibility

To improve transit accessibility, OUSA recommends The Ministry of Transportation ensure that all municipal transit systems include modernized transportation policy and innovative new technology in compliance with the AODA. The province should encourage post-secondary institutions to alleviate financial burdens on students with disabilities through specialized services and supports. Additionally, in collaboration with the Ministry of Transportation, the Ministry of Colleges and Universities should improve existing transit information communications systems, including increased supports through virtual or in-person alternatives. The MTO should increase operational funding for municipal transit agencies to maintain and increase transit and para-transit service frequency to universities.

GLOSSARY

Ableism: is defined by the Ontario Human Rights Commission as “attitudes in society that devalue and limit the potential of persons with disabilities” and identified by the Law Commission of Ontario as “embedded in institutions, systems or the broader culture of a society.”¹

Assistive Technologies: “Assistive (or Adaptive) Technology (AT) is the term used to describe all of the tools, products, and devices – from the simplest to the most complex – that can make a particular function easier or possible to perform. Some assistive technologies include screen readers, alternative keyboards, head-pointing devices, voice recognition software, and screen magnification software.”²

AODA: The Accessibility for Ontarians with Disabilities Act, or AODA, aims to identify, remove, and prevent barriers for people with disabilities. The AODA became law on June 13, 2005 and applies to all levels of government, nonprofits, and private sector businesses in Ontario that have one or more employees (full-time, part-time, seasonal, or contract). The AODA includes requirements that all organizations must meet, with deadlines specific to an organization’s type and size. The AODA is made up of five parts, or Standards, and deadlines for compliance began as of January 1, 2010.”³

Barrier-free/universal washrooms: “Universal washrooms can provide privacy and dignity for people of all abilities, including people with disabilities who may need the assistance of an attendant. They provide a barrier-free toilet and sink and turning space to accommodate a wheeled mobility device. A power door operator must be provided at the entrance door.”⁴

Disability: covers a broad range and degree of conditions, some visible and some not visible. A disability may have been present from birth, caused by an accident, or developed over time.⁵

IDIA: Inter-University Disability Issues Association (IDIA) provides a forum for professionals working in the accessibility offices of Ontario universities to share ideas and problem-solve together. <https://idia.ca/>

¹ Ontario Human Rights Commission, “5. Ableism, negative attitudes, stereotypes and stigma,” in policy on preventing discrimination based on mental health disabilities and addictions, *Ontario Human Rights Commission*, n.d., <https://www.ohrc.on.ca/en/policy-preventing-discrimination-based-mental-health-disabilities-and-addictions/5-ableism-negative-attitudes-stereotypes-and-stigma>

² Learning Disabilities Association of Ontario, “Assistive Technology,” Learning Disabilities Association of Ontario, 2015, <https://www.ldao.ca/introduction-to-ldsadhd/what-helps/assistive-technology/>

³ Accessibility Services Canada, “About the AODA,” *Accessibility Services Canada*, <https://accessibilitycanada.ca/legislation/aoda/>

⁴ Ontario Building Officials Association, “Fact Sheet – Barrier-Free and Universal Washrooms,” *Ontario Building Officials Association*, <https://vo.oboa.on.ca/news/files/Final%20Washrooms%20Fact%20Sheet.pdf>

⁵ Ontario Human Rights Commission, “Disability,” Ontario Human Rights Commission, n.d., https://www.ohrc.on.ca/en/code_grounds/disability?page=1&f%5Bo%5D=bundle%3Apage

INTRODUCTION

OUSA believes all willing and academically qualified students should be able to access post-secondary education in Ontario. However, students with disabilities, both visible and invisible, face barriers to furthering their education and meaningfully engaging with their institutional communities due to the lack of accessibility and accommodations that exists on many campuses. This practice negatively impacts their post-secondary persistence and completion.

Since the onset of the COVID-19 pandemic, there has been a greater emphasis on accessibility and disability inclusion. The transition to remote learning illuminated many shortfalls of traditional learning models and accessibility measures for students of varying abilities. The pandemic brought forth a greater understanding of neurodiversity, leading many people to seek out accommodations from their accessibility offices. At the same time, as students contracted COVID-19, some experienced long-term symptoms now categorized as long COVID, transitioning learners into a life of disability they had never experienced before.⁶ With the rise of those experiencing or acknowledging their disability, many students gained a greater awareness of the barriers to receiving accommodations from their institutions and having them honoured by their educators. Obstacles such as extensive paperwork, letters from multiple professionals, and slow approval processes from accessibility offices caused great frustration for those with disabilities attempting to complete their education.

For students with existing disabilities, the transition online and adaptability exposed the ease with which institutions could have previously accommodated their accessibility needs despite resistance in previous in-person learning environments. Students could access lectures a-synchronously, receive flexible deadlines and multiple options for assignments, and faculty began incorporating principles of universal design learning (UDL) into their teaching practices.⁷

Despite the apparent changes that could have been made and the growing awareness of the necessity of accessibility services, students across the province still lack access to adequate supports throughout their degrees. According to the 2020 Ontario Undergraduate Student Survey (OUSS), which surveyed students across OUSA's eight member institutions, 27% of respondents reported having at least one type of disability, up from 19% reported in 2017 results.⁸ With rising numbers of individuals with disabilities accessing post-secondary education, it is more important than ever to ensure accessibility is centred in post-secondary education in Ontario.

Access to accommodations is essential to creating equitable educational experiences for post-secondary students with disabilities. Although post-secondary education serves as a means for economic and social mobility for students with disabilities, they still face poorer outcomes than their non-disabled counterparts. A study by HEQCO found that about 48% of graduates with disabilities are far more likely to feel overqualified for their job compared to 34% of those without disabilities.⁹ Further, disabled graduates are significantly more likely to be low-income, with the most significant gap existing for those with a mental health disability, where 44% of graduates are low-income versus 22% of their non-disabled counterparts.¹⁰ As such, despite the efforts to lower barriers through education, various systemic obstacles still contribute to the ongoing marginalization of people with disabilities.

⁶ Skylar Magee and Mays Imad, "Long COVID Is Here to Stay," *Inside Higher Ed*, May 30, 2022, <https://www.insidehighered.com/views/2022/05/31/colleges-must-support-students-long-covid-opinion>

⁷ Jackie Pichette, Sarah Brumwell, and Jessica Rizk, *Improving the Accessibility of Remote Higher Education: Lessons from the Pandemic and Recommendations* (Toronto, ON: Higher Education Quality Council of Ontario, 2020).

⁸ Britney De Costa, Malika Dhanani, and Shemar Hackett, *Accessibility: Results from the 2020 Ontario Undergraduate Student Survey*, Research Report (Toronto: Ontario Undergraduate Student Alliance, 2022), 10, https://assets.nationbuilder.com/ousa/pages/2141/attachments/original/1646417170/OUSA_Accessibility_2020_Results_from_Ontario_Undergraduate_Student_Survey_document.pdf?1646417170; Britney De Costa, and Martyna Siekanowicz, *Accessibility: Results from the 2017 Ontario Post-Secondary Student Survey*, Research Report (Toronto: Ontario Undergraduate Student Alliance, 2019), 16, https://assets.nationbuilder.com/ousa/pages/1868/attachments/original/1565123812/FINAL_FINAL_OPSSS_Accessibility_Report_2017document.pdf?1565123812

⁹ Ken Chatoor, *Postsecondary Credential Attainment and Labour Market Outcomes for Ontario Students with Disabilities* (Toronto: Higher Education Quality Council of Ontario, 2021)

¹⁰ Ibid.

The Ontario Human Rights Code defines disability as “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.”¹¹ This definition encompasses the wide range of disabilities that people can experience. However, there are also different models to describe disabilities, primarily the medical model and the social model. The medical model positions those with disabilities as impaired and requiring treatment. It also places the onus on those with disabilities to ensure they have access to resources. This is typically how post-secondary institutions operate, requiring students with disabilities to advocate for themselves to receive adequate accommodations.¹² This tends to isolate students with disabilities. The social model however, which is used by the Ontario Human Rights Commission removes the onus from those with disability and instead on society at large to create an inaccessible and hostile environment for those with disabilities. Within this framework it is integral that all actors faculty, staff, institutions and society at large to ensure those with disabilities have equal access.

Following the social model of disability, the recommendations proposed in this paper aim to improve the physical and social accessibility of post-secondary education. Through recommendations that suggest more robust training beyond AODA minimums, streamlining the accommodations processes, supporting transitions into and out of post-secondary, lessening financial barriers, and improving the accessibility of provincial policy, OUSA aims to address some of the many social and systemic issues faced by students with disabilities. In addition, recommendations to improve physical accessibility span across accessible washroom availability, parking and campus infrastructure more broadly.

OUSA believes that the Ministry of Colleges and Universities can work alongside Ontario universities to create more accessible and equitable campuses to ensure the success of all attending students. However, this requires total commitment through research, policy interventions, and active work to destigmatize the needs of students with disabilities to be actualized. By centring the perspectives of students with disabilities, the provincial government and post-secondary institutions can realize this reality.

This policy paper was written by student leaders in consultation with students at their respective institutions who identified as students with disabilities. The following principles, concerns and recommendations outline the state of accessibility on Ontario campuses and offer guidance on how the province can create truly accessible, affordable, accountable and high-quality education for all students.

¹¹ Ontario Human Rights Commission, “2. What is disability?,” *Ontario Human Rights Commission*, n.d., <https://www.ohrc.on.ca/en/policy-ableism-and-discrimination-based-disability/2-what-disability>

¹² Landscape of Accessibility and Accommodation in Post-Secondary Education for Students with Disabilities,” *National Educational Association of Disabled Students*, July 2018, <https://www.neads.ca/en/about/media/AccessibilityandAccommodation%202018-5landscapereport.pdf>

INCLUSIVE CAMPUS ENVIRONMENTS

TRAINING

Principle: Students with disabilities should be able to navigate their university experience without the undue hardship of advocating for their rights.

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.

Principle: Students that face multi-faceted intersectional structures of disability and cultures should be provided alternative avenues and services that identify, target and advocate for invisible disabilities.

Principle: All students attending post-secondary institutions should have the opportunity to access AODA training and knowledge within their respective fields and disciplines.

Concern: Cultures in which disability is considered taboo can create internalized fear or social stigma for students who seek supportive services or treatment.

Concern: Students attending post-secondary institutions have a limited understanding of disability in accessibility, mostly citing learning disabilities, followed by mobility, then sensory impairments, with a relatively small percentage indicating mental health disabilities.

Concern: Even though AODA training is mandated by law, student workers and volunteers are often not directed to complete AODA training.

Concern: Even though AODA training is required by law, accessibility training for instructors, staff, and teaching assistants is not catered to post-secondary environments.

Concern: There is currently no provincial mandate governing accessibility training for student-facing staff including but not limited to faculty, staff, and student workers or volunteers.

Concern: The lack of widespread knowledge of the AODA amongst university administration and staff contributes to non-compliance and ableism in classrooms and administrative settings.

Recommendation: The Ministry of Colleges and Universities should collaborate with the Ministry for Seniors and Accessibility, and students with disabilities to create standardized accessibility training based on the Postsecondary Education Standards Development Committee 2022 Final Recommendations Report.

Recommendation: The Ministry of Colleges and Universities should ensure that the post-secondary accessibility training is intersectional and aims to address the additional barriers racialized and other marginalized people with disabilities may face.

Recommendation: The Ministry of Colleges and Universities should mandate that institutions administer a post-secondary specific AODA training to all university personnel.

Recommendation: The Ministry of Colleges and Universities should mandate that institutions administer a comprehensive and intuitive post-secondary specific AODA training to all staff, student staff, and volunteers.

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 guidelines for incorporation of universal design for teaching and learning into their classrooms.

Recommendation: The provincial government should mandate that all institutions have an advisory committee dedicated to campus accessibility and require that it is composed of students with disabilities, university personnel, and university stakeholders.

Students deserve to feel welcomed at their campus and should be able to navigate their university experience without the undue hardship of advocating for their rights. Yet, many students with disabilities across the province can attest to facing instances of discrimination at their universities, from classmates, university staff, and professors alike. There is an inadequate commitment to dismantling and combatting ableism on university campuses and minimal training to improve the overall attitude and approach to student accessibility. Ontario university staff are required to complete the standard AODA training required of all employed individuals in Ontario. Beyond this requirement, comprehensive AODA training for institution staff, both student facing and non-student facing does not exist at the provincial level and varies greatly across institution. This creates barriers for students with disabilities when accessing services and experiences on campus as accessibility is often under/unconsidered in design. While there are some examples where, despite incomplete training, staff are able and willing to learn how to interact with students with disabilities and how to include them to the best of their ability, it is not the norm. For example, a professor at the University of Toronto seeks to proactively integrate accessibility into the classroom by waiving accommodation letters, using closed-captioned slides, and recording lectures.¹³ Using this type of an approach to instruction would minimize access barriers for many disabled students; however, it is seldom used in post-secondary education.

Oftentimes, accessibility and disability inclusion focus on students with a physical or learning disability. Approximately 20 percent of students aged 16 and older are neurodivergent.¹⁴ Yet professors within post-secondary institutions often are not equipped with the knowledge or resources to provide equitable education opportunities to these students. Furthermore, students that have invisible disabilities, particularly those with medical, cognitive, or mental disabilities, often get left out and do not get their needs met properly or at all. They often are stigmatized as a result of their disabilities. This is especially true for students from immigrant backgrounds or visible minorities. They struggle with their intersectionality because they often come from cultures where disability is considered taboo; students are afraid of getting diagnosed for fear of being ridiculed by their communities. They also face stigma and internalized ableism from university staff because of stereotypes of certain minority groups. Students that live in on-campus housing with invisible disabilities, particularly those with seizure disorders, mental health disabilities and certain neurodivergent disorders such as autism and ADHD, benefit from having an individual trained in first aid and crisis intervention training living with them.

To make university staff and volunteers adequately informed on how to ensure their campuses and services are accessible, the Ministry of Colleges and Universities (MCU) should mandate that institutions administer a comprehensive and intuitive post-secondary specific AODA training to all staff, student staff, and volunteers. To aid in this process the MCU should collaborate with the Ministry for Seniors and Accessibility (MSA), and students with disabilities to create standardized accessibility training based on the Postsecondary Education Standards Development Committee 2022 Final Recommendations Report. This would serve as a basis for institutional specific training and ensure all institutions are working under the same principles of accessibility. By working with students with disabilities and the MSA, the MCU would ensure that the information provided is designed from a community-first perspective that centres the voices of those with disabilities. This training should also aim to be intersectional and address the additional barriers racialized and other marginalized people with disabilities may face. This ensures that all affected student populations are accounted for and their needs do not remain unaddressed. Through

¹³ Alexandra Rendely, "Building Respectful Inclusion One Semester at a Time," *Dalla Lana School of Public Health (University of Toronto)*, August 1, 2019, <https://www.dlsph.utoronto.ca/2019/08/01/building-respectful-inclusion-one-semester-at-a-time/>

¹⁴ Nadine Araksi, "Is Your Workplace Supporting Neurodiverse Employees?," *Canadian Business*, April 1, 2022, <https://canadianbusiness.com/ideas/neurodiversity-in-the-workplace-dei/#:~:text=While%20we%20don't%20have,has%20one%20or%20more%20disabilities.>

intersectional disability justice informed resources, the MCU and institutions can work towards making more equitable and accessible campuses.

While accessibility is required in all post-secondary spaces, accommodations in academics and learning environments are the primary areas that would enable student success and reduce stress. In fact, the Higher Education Quality Council of Ontario (HEQCO) found that, in the event of online classes in Fall 2020 semester due to COVID-19, 61% of students with disabilities reported that flexible course delivery and participation would be “extremely important” to their success.¹⁵ The accommodations made during the pandemic for remote learning should be carried forward as a standard part of accessibility considerations in the classroom. This is why 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 guidelines for incorporation of universal design for teaching and learning into their classrooms. University staff interviewed in the above HEQCO study have underscored this point, with one participant stating “It’s critical to think of designing for students with accessibility needs in advance. After the fact can be difficult and you might make some choices that aren’t supportable.”¹⁶

Ultimately, the above recommendations on training can only be developed and informed by the various agents who understand and interact with post-secondary accessibility mechanisms. This is why the provincial government should mandate that all institutions have an advisory committee dedicated to campus accessibility and require that it is composed of students with disabilities, university personnel, and university stakeholders. This would offer an opportunity for different perspectives to collaborate when discussing accessibility on campus and provide a more comprehensive look at how the above trainings can serve their respective communities.

PARKING

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

Principle: Students with permanent and temporary disabilities should be able to easily locate and access accessible parking on campus.

Concern: At some institutions, students may incur additional costs for accessible parking causing a financial burden on disabled students.

Concern: A lack of accessible parking can impede students with disabilities from fully participating in campus life due to longer travel times/inaccessible routes from the nearest accessible parking

Recommendation: The Ministry of Colleges and Universities should mandate all post-secondary institutions to provide universal parking permits/passes for students with disabilities.

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

Students with permanent and temporary disabilities should be able to easily locate and access accessible parking on campus. Alongside with their classmates, students with disabilities across the province

¹⁵ Pichette, Brumwell, and Rizk, *Improving the Accessibility of Remote Higher Education*,

¹⁶ Ibid.

commute to their campus using their own vehicles. While most campuses have student parking, the accessible parking available is limited. Accessible parking is essential to ensure all students can fully participate in campus life and easily get to their destinations across campus. However, longer travel time, or inaccessible routes and parking are barriers that hinder full student participation.

At some institutions, parking passes are limited to singular parking lots and students must pay more money for access to multiple lots. For students with mobility issues in geographically expansive campuses, being able to park close to their classes is an essential accommodation that is not considered by many institutions. As a result, students must spend more money to comfortably traverse their campuses incurring additional costs (or what is commonly referred to as a disability tax) due to the lack of accommodations for their disabilities. For example, as of 2023, Wilfrid Laurier University charges \$25.73 per week (or \$51.59 per month) for an 8-week temporary accessible parking permit for students.¹⁷ If the permit is needed beyond that timeframe, students are encouraged to apply for a free provincial accessible parking permit that can be used on campus.¹⁸ It is unfair that students with a temporary disability have to pay extra for an accessible parking permit whereas a long-term provincially administered permit is free. Further, a student in OUSA's 2022 Ontario Undergraduate Student Survey stated that a support service currently lacking from their institution in parking, suggesting "...better parking for people with disabilities without having to pay extra costs and get multiple documents from medical personnel."¹⁹ In their final report to the Ministry for Seniors and Accessibility, the Postsecondary Education Standards Committee recommended that post-secondary institutions not charge premium fees for proximal parking spaces that disabled students with government-issued parking permits require to reasonably access their campus, knowing the additional financial burden this places on students.²⁰

To improve the accessibility of campus access, OUSA recommends the provincial government 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, considering the utilization of the buildings the parking lots are close to. This would help lessen the demand for accessible parking spots across campus. To assist universities, the provincial government should allocate capital funds to universities that are specifically looking to modify existing or create new accessible parking spots on campus. Additionally, the Ministry of Colleges and Universities should mandate all post-secondary institutions to provide universal parking passes for students with disabilities.

CAMPUS INFRASTRUCTURE AND BUILT ENVIRONMENTS

Principle: Students with disabilities should not be impeded from accessing all spaces and services on campus.

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

Concern: A lack of automatic door openers can pose an accessibility barrier for students.

Concern: Aging infrastructure and existing accessibility infrastructure within post-secondary institutions are poorly maintained, creating accessibility barriers.

Concern: Visually impaired students are often underserved on university campuses due to the lack of visual aids.

¹⁷ Wilfrid Laurier University, "Parking Fees," *Wilfrid Laurier University*, 2023, <https://students.wlu.ca/services-and-spaces/parking-and-transportation/parking-fees.html>

¹⁸ Service Ontario, "Get an accessible parking permit," *Government of Ontario*, last updated May 24, 2023, <https://www.ontario.ca/page/get-accessible-parking-permit>

¹⁹ Unpublished quote from OUSA's 2022 Ontario Undergraduate Student Survey.

²⁰ Postsecondary Education Standards Development Committee, "Development of proposed postsecondary education standards — final recommendations report 2022," *Government of Ontario*, April 25, 2022, <https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022>

Concern: Accessible pathways are not always clearly marked or accessible on campus, increasing physical barriers for students with disabilities.

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 all physical signs, including automatic door openers, include braille.

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.

Under the Transportation Standard of the AODA, colleges, universities, and hospitals that offer transportation services around or between their campuses must make those services accessible upon request. This requirement applies to these institutions which receive yearly government operating grants. Readily available means of transportation and related supports for students should include but is not limited to:

- Level entrances, ramps, or lifts
- Spaces for people using mobility devices
- No charge for storing mobility devices
- Courtesy seating for passengers with disabilities
- Audio and visual announcements
- Stop request and emergency response buttons at a height someone using a mobility device can reach
- Information about services, such as routes, times, and delays, in accessible formats

Post-secondary institutions must ensure the elements above are implemented when designing university spaces, and when their spaces are not accessible, it leads to a lack of trust between students and their institution. One student in our 2022 Ontario Undergraduate Student Survey said, "Accessibility is often not taken seriously or not upheld to the quality it should. Wheelchair/walker ramps aren't available for every building, [and] disability accommodations are lacking."²¹ Another student mentioned accessibility as needing the most improvement at their institution "...because buildings are really old and often can only have stair access."²² Oftentimes there is a clear difference between what services universities need to provide and the services that occur on campus. Since campuses are composed of buildings built in several different time periods, older buildings frequently fail to meet current accessibility standards. Despite this, many universities have delayed timelines to renovate these buildings for accessibility. In fact, the average age of a university building in Ontario is about 40 years old and typically, buildings should be renewed once they hit the 30 year age mark – this makes Ontario's universities about 10 years past their due retrofitting.²³ The latest AODA study shows that as of 2019, over 20% of Ontarians have some form of disability.²⁴ Given that one in five Ontarians live with a disability, universities should ensure their existing buildings and infrastructure are retrofitted to accommodate students of all ability levels. In older buildings with outdated accessibility features, ramps are often difficult to access and have poor signage which makes navigating buildings and traversing campus in a timely manner difficult for students with mobility devices. The poor maintenance of these accessibility features creates greater accessibility barriers

²¹ Unpublished quote from OUSA's 2022 Ontario Undergraduate Student Survey.

²² Ibid.

²³ Committee on Space Standards and Reporting, "2019-20 Inventory of Physical Facilities of Ontario Universities," *Council of Ontario Universities*, December 2021, <https://cou.ca/wp-content/uploads/2022/03/2019-20-Triennial-Inventory-Physical-Facilities-Updated.pdf>

²⁴ Ministry for Seniors and Accessibility, "Accessibility for Ontarians with Disabilities Act annual report 2019, *Government of Ontario*, May 21, 2021, <https://www.ontario.ca/page/accessibility-ontarians-disabilities-act-annual-report-2019#:~:text=An%20open%20and%20accessible%20Ontario&text=In%20Ontario%2C%20approximately%202.6%20million,in%20their%20every%20day%20life.>

for students rather than mitigating them. In other cases, accessibility features are excluded from buildings entirely. Visually impaired students are often underserved on university campuses due to the lack of visual aids, including braille on signs and audio aids. Newer buildings need to comply with these standards as more Ontarians struggle with disabilities and encounter a lack of building accommodations to go with them. According to the AODA compliance reports that post-secondary institutions are required to publish, universities are renovating building spaces to comply with AODA standards but lack the resources necessary to accomplish this. One example of this can be seen at McMaster University, where the third phase of their Campus Accessibility Action Plan will begin in 2023 following an internal audit of building spaces; however, the Plan does not have sufficient funding to fulfil the impending recommendations from the audit.²⁵ This delays and undermines an institution's ability to accommodate disabled students.

To ensure campuses across Ontario are accessible, OUSA recommends 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. The Ministry of Colleges and Universities should also mandate that all physical signs, including automatic door openers, include braille. Further, 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.

WASHROOMS

Principle: Students with disabilities should not face undue hardship when locating and accessing washrooms on campus.

Principle: Students should have visual aids outlining accessible facilities available to them.

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

Concern: Visually-impaired students do not/may not have the appropriate bathroom signage available to them.

Recommendation: The Ministry of Colleges and Universities should provide envelope funding to universities to equip washrooms with accessibility aids in order to increase the availability of aids such as ceiling lifts and braille signage.

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

All students deserve the ability to access all the services on their campus. This is particularly important given that the United Nations Convention on the Rights of Persons with Disabilities emphasizes "the importance for persons with disabilities of their individual autonomy and independence, including the freedom to make their own choices."²⁶ However many campuses, especially older campuses, do not have updated facilities to facilitate navigation around campus for people with disabilities which compromises the independence they deserve to accomplish activities of daily living, such as using the washroom. Creating and not addressing roadblocks leads many students to being discriminated against due to the poor infrastructure. With the large population of students with disabilities in Ontario, the regulations for what accessible washrooms are need to be updated as we learn more about the needs of those with these

²⁵ McMaster Accessibility Council, "2021 Annual Accessibility Activity Report," *McMaster University*, October 7, 2022, <https://accessibility.mcmaster.ca/app/uploads/2022/10/McMaster-2021-Internal-Accessibility-Activity-Report-1.pdf>

²⁶ Office of the High Commissioner for Human Rights, "Convention on the Rights of Persons with Disabilities," *United Nations*, December 12, 2006, <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-persons-disabilities>

disabilities. The Ontario College of Art and Design (OCAD) University created Facility Accessibility Design Standards that provide detailed descriptions and graphics for what accessible washrooms look like.²⁷ This includes better signage for where accessible washrooms are, including both visual aids as well as braille, sizes for toilet stalls, and designs for grab bars, among several other requirements.²⁸ The implementation of these Standards has been recommended by the Postsecondary Education Standards Committee in making campuses more inclusive for disabled students.²⁹ Furthermore, gender-neutral washrooms, including multi-stall, need to be taken into account when designing these, as Two-Spirit and LGBTQIA+ students may have different accommodations that need to be planned for. Consequently, the Ministry of Colleges and Universities should provide envelope funding to universities to equip washrooms with accessibility aids in order to increase the availability of aids such as ceiling lifts and braille signage, and to increase the number of barrier-free/universal washrooms on university campuses.

TRANSITION

TRANSITION TO POST-SECONDARY EDUCATION

Principle: All students should have the opportunity to participate in all programming that accommodates their accessibility needs.

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

Principle: Accurate information on campus support services should be available and publicized to all incoming students

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.

Principle: Orientation events should be designed to create an inclusive environment for all students of all abilities.

Concern: Students are often unaware that they are required to provide annual documentation for renewal of accommodations in advance of the start of courses.

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

Concern: Not all orientations are designed with accessibility in mind, excluding students with disabilities from important campus integration activities.

Recommendation: The Ministry of Colleges and Universities should develop a set of guiding principles for institutions to enact with regards to the documentation process of receiving support.

²⁷ OCAD University, “2017 Facility Accessibility Design Standards,” *OCAD University*, January 2017, https://www.ocadu.ca/sites/default/files/2021-06/OCADU_FADS_21-05-26.pdf

²⁸ Ibid.

²⁹ Postsecondary Education Standards Development Committee, “Development of proposed postsecondary education standards,”

Recommendation: The MCU should create a best practises guideline for institutions on how to create fully accessible orientation weeks.

The transition period between secondary school and university is often a stressful time, as students have many questions and may not know where to look. This is especially true when it comes to students with disabilities, and there are many extra steps they need to take in order for the institution to properly recognize their disability. The lack of a streamlined process to submit documentation for the university is an issue, especially with the limited information provided upfront to students. Some institutions do not accept assessments that were completed after a certain time, usually 3-5 years, and typically require annual documentation renewal which can be a cumbersome process. Additionally, acquiring documentation places increased financial constraints since students need to pay for tests and paperwork. Coupled with a lack of awareness, these challenges often lead students to miss out on very important dates and transition pieces, such as submitting academic accommodations and requirements. This is why the Ministry of Colleges and Universities should develop a set of guiding principles for institutions to enact with regards to the documentation process of receiving support, as well as create a best practises guideline for institutions on how to create fully accessible orientation weeks.

ACCESSIBLE SUMMER TRANSITION PROGRAMS

Principle: All students should have 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.

Concern: The level of information provided to students in summer transition programming regarding accessibility services varies across institutions

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

Concern: Students with disabilities are impeded from accessing and attending summer transition programs due to unmet 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 (HEQCO) 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.

When students enter post-secondary education, their lifestyles can change due to the various demands of university as well as their exposure to post-secondary culture. This can be significantly different than their secondary school routines, and preparing for this the summer prior to starting university is essential to ensuring a smooth transition. Students with disabilities should be properly prepared to begin post-

secondary with a firm understanding of the resources and supports they will have access to, as well as the scope of these services. This is also important for on-campus service providers and faculty so that they have the knowledge to direct students to the appropriate supports, as well as design and produce instructional content that proactively considers accessibility.

However, the summer preparation processes for students and university personnel are not sufficient enough to ensure that they are properly equipped for a successful, inclusive educational experience. This leaves students confused and isolated from their campus communities. Even if these transition resources are available in the summer, they are typically inaccessible to students due to unmet accommodations. As such, 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. Additionally, the province should mandate that all universities make specific summer transition services available for incoming students with disabilities. Lastly, to ensure consistency across institutions, the provincial government should task the Higher Education Quality Council of Ontario (HEQCO) with researching best practices for transition programs and support services for students with disabilities based on findings from the Transitions Longitudinal Study.

TRANSITION INTO EMPLOYMENT

Principle: All students should have equitable access to safe and meaningful employment opportunities regardless of ability.

Principle: All student staff should get the accommodations they require for a barrier-free employment experience.

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

Concern: Oftentimes, students with disabilities are not provided with the appropriate accommodations by their employers. As a result, they often have to pay out of pocket to make their workplaces accessible to them.

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 early in the process.

Concern: Recipients of ODSP are at risk of a reduction or suspension of their funding if they are earning more than \$1000 per month.

Concern: Institutions often do not have funding to provide the accommodations necessary for their student staff with physical support needs

Recommendation: The provincial government should provide institutions funding to ensure all on-campus student employment opportunities are accessible to students with disabilities.

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.

The transition period for post-secondary students, both between high-school to university as well as from post-secondary to employment is a crucial part in all students' lives. There should be no barriers to preventing students from being able to effectively transition in and out of post-secondary. Students with disabilities often face barriers during the transition period as they have additional support needs. University staff and employers often can have internalized ableism which can cause problems with the transition process and demonstrates a lack of understanding the needs of disabled students in their employment search. Oftentimes, transfer students with disabilities face more barriers with transitions as they have additional needs on top of dealing with issues being a transfer student.

This issue is particularly important due to the disproportionate labour market outcomes that students with disabilities face when entering the workforce. A study by HEQCO found that about 48% of graduates with disabilities are far more likely to feel overqualified for their job compared to 34% of those without disabilities.³⁰ Further, disabled graduates are significantly more likely to be low-income, with the greatest gap existing for those with a mental health disability where 44% of graduates are low-income versus 22% of their non-disabled counterparts.³¹ Additionally, graduates with disabilities are less likely to hold jobs that offer benefits such as health, dental, and retirement benefits, as well as paid vacation and sick leave.³² Work-integrated learning (WIL) is an essential part of post-secondary education, especially as it pertains to preparing students for the workforce. These opportunities build the skills, knowledge, and experience for students to apply in the workforce upon graduation. However, disabled students tend not to seek out WIL because of the negative perceptions they anticipate facing from their employers, which inhibits them from gaining relevant work experience and thus, disadvantages them in the labour market.³³ Among those in WIL, students with disabilities feel uncomfortable disclosing their status due to the lack of understanding about their needs – in fact, 80-90% of disabled students participated in WIL without accommodations that would have enhanced their success in the roles.³⁴ Additionally, post-secondary institutions have minimal, easily accessible communication tools that bring awareness to WIL supports for disabled students - a scan of post-secondary institutions' websites across Canada found that only 18% of them mention disability supports for WIL.³⁵

Whether it is work-integrated learning, post-graduation employment, or a work-study program, disabled students and graduates deserve opportunities and professionals who are properly informed on how to best support their needs in these transitions. Therefore, the provincial government should provide institutions funding to ensure all on-campus student employment opportunities are accessible to students with disabilities, and for the training of an existing career consultant or a career consultant specifically dedicated to supporting students with disabilities transition into the workforce. The Ministry of Colleges and Universities should also 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. Furthermore, 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.

³⁰ Chatoor, *Postsecondary Credential Attainment and Labour Market Outcomes*,

³¹ Ibid.

³² Ibid.

³³ Gatto et al., "Students with disabilities: Relationship between participation rates and perceptions of work-integrated learning by disability type," *International Journal of Work-Integrated Learning* 22, no.3 (2021): 287-306, <https://files.eric.ed.gov/fulltext/EJ1313489.pdf>

³⁴ Ibid.

³⁵ Gatto et al., "Work integrated learning resources for students with disabilities: are post-secondary institutions in Canada supporting this demographic to be career ready?," *Higher Education, Skills and Work-Based Learning* 11, no.1 (2021): 125-143, <https://www.emerald.com/insight/content/doi/10.1108/HESWBL-08-2019-0106/full/html>

SUPPORT SERVICES

Principle: Post-secondary institutions must be equipped to fulfil their duty to accommodate students with disabilities³⁶ and accessibility needs.

Principle: Students with disabilities must have an equitable opportunity to reach their highest level of academic potential.

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

Principle: Students with disabilities must be able to receive service and support in a timely manner from accessibility offices.

Principle: University instructors and staff must be trained on how to implement the principles of Universal Design for Learning in the classroom.

Principle: All students must have the right to arbitration from an independent body in the event of a dispute regarding academic accommodations.

Concern: Faculty and staff may not be equipped with the proper training or resources to implement academic accommodations.

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

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

Concern: Accommodation of students with disabilities at the post-secondary level is not subject to the same detailed legislative structures as at the primary and secondary levels.³⁷

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 all institutions hold an independent review process for appeals for accommodations, creating barriers in the dispute process.

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 for students with disabilities.

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

³⁶ Ontario Human Rights Commission, "8. Duty to accommodate," *Ontario Human Rights Commission*, n.d., <https://www.ohrc.on.ca/en/policy-ableism-and-discrimination-based-disability/8-duty-accommodate#:~:text=The%20duty%20to%20accommodate%20people.worth%20as%20a%20human%20being>

³⁷ Ontario Human Rights Commission, "Post-secondary education," *Ontario Human Rights Commission*, n.d., <https://www.ohrc.on.ca/en/opportunity-succeed-achieving-barrier-free-education-students-disabilities/post-secondary-education>

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 develop a formal definition of disability that describes individuals with functional limitations that are expected to persist, but not necessarily for their whole life.

Recommendation: The province should mandate that all campuses have a virtual accessibility hub that provides students with support systems and resources to ensure they excel during their university career.

Recommendation: The province should give funding to institutions in order for universities to have their own attendant program.

Recommendation: The Ministry of Colleges and Universities should create a best practices guideline on confidentiality and staff compliance to the Code of Disability Policy.

Having access to appropriate resources is essential in fostering academic success amongst students who face disabilities. Performing well in academic settings through the use of support services will assist in student success beyond the classroom by providing individuals with the necessary skills and knowledge to excel in the workforce, and overall contribute to society in a meaningful way. If students are facing barriers from receiving support in an educational setting, this can then have a detrimental impact on their future endeavours and career path.

According to the Ontario Human Rights Code, people with disabilities are “[guaranteed] the right to equal treatment in education, without discrimination on the ground of disability, as part of the protection for equal treatment in services. This protection includes but is not limited to colleges and universities, both public and private.³⁸ The accommodations must be provided to the point of undue hardship, which is determined according to cost, outside funding, or health and safety requirements.

In addition, the code details that “All 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 to the point of undue hardship. Under the *Ontarians with Disabilities Act*, they are also required to complete an accessibility plan.³⁹ 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 Inter-University Disability Issues Association (IDIA) is an organization of university accessible education professionals from across the province. 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

³⁸ Ontario Human Rights Commission, “Policy on accessible education for students with disabilities,” *Ontario Human Rights Commission*, n.d., <https://www.ohrc.on.ca/en/policy-accessible-education-students-disabilities#:~:text=The%20Code%20guarantees%20the%20right,universities%2C%20both%20public%20and%20private>.

³⁹ Ontario Human Rights Commission, “Accommodating students with disabilities - Roles and responsibilities (fact sheet),” *Ontario Human Rights Code*, n.d., <https://www.ohrc.on.ca/en/accommodating-students-disabilities-roles-and-responsibilities-fact-sheet>

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 province should also give funding to institutions in order for universities to have their own attendant program.

Furthermore, all students should have the same access and awareness of the accommodations process, which is why the provincial government should mandate that all campuses have a virtual accessibility hub that provides students with support systems and resources to ensure they excel during their university career. This hub should consider the needs of international students, whose first language may not be the primary language adopted by the institution. 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.

Faculty and staff are key to supporting students' access to accommodations and accessibility services, but there is inconsistency in the implementation of these services. There can also be confusion between the different agents of accessibility, as one student in our biennial survey notes, "...[the] Accessibility Office is helpful, but limited in the help they can provide because of inherent academic policies."⁴⁰ Some faculty have limited familiarity with the legal responsibility to provide accommodations. Others have limited experience supporting students with disabilities and lack access to the appropriate training to do so. Institutional staff have also commented on the degree of variability among institutions with integrating accessibility into their work. Through interviews conducted by HEQCO, staff have expressed the desire to connect with their counterparts at other institutions in order to share best practices, tools, and knowledge on UDL and other accessibility approaches.⁴¹ University staff should be well equipped in providing support services to students, having staff equipped with UDL principles ensures for fostering an environment which harbours masterful learners who are purposeful, motivated, resourceful, knowledgeable, strategic, and goal-directed.

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. 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.

MENTAL HEALTH SERVICES

Principle: Students with disabilities deserve access to mental health counselling that addresses their unique needs and intersecting identities.

Principle: Mental health resources should be equitably available and accessible to persons with disabilities.

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

Concern: Persons providing mental health counselling or services on post-secondary campuses may not be adequately trained on how to best serve persons with disabilities.

⁴⁰ Unpublished quote from OUSA's 2022 Ontario Undergraduate Student Survey.

⁴¹ Rachel Courts et al., *HEQCO's Dialogues on Universal Design for Learning: Finding Common Ground and Key Recommendations from the Sector* (Toronto: Higher Education Quality Council of Ontario, 2023)

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

Recommendation: The Ministry of Mental Health and Addictions and the Ministry of Colleges and Universities should work in collaboration to develop best practices for a whole-of-community approach that supports comprehensive and accessible mental health services for students with disabilities.

Recommendation: The Ministry of Colleges and Universities should provide post-secondary institutions with annual funding for counselling services and resources, to address the growing need for more mental health support.

Recommendation: The Ministry of Colleges and Universities and the Ministry of Mental Health and Addictions should work in collaboration to develop a strategy to increase support for students with emerging mental health disabilities, particularly in communities with a large young adult population (such as communities near post-secondary institutions).

The impact of mental health disabilities, without accommodations, can have significant effects on students. Almost 25% of Ontarians with mental health disabilities have not completed formal education which is significantly higher than the 6.4% of individuals with other types of disabilities.⁴² Further, non-disabled individuals are two times more likely to have a university degree than those with mental health disabilities.⁴³ Evidently, there are disproportionate graduation outcomes for students with mental health disabilities.

This notably stems from the fact that mental health disabilities can be invisible, and thus, cultivates a stigma when asking for accommodations.⁴⁴ As a result, the duty to accommodate may be compromised by accessibility services and/or other instructional staff who can hold preconceived notions and biases about mental health disabilities.

Providing documentation as evidence of a disability is a prerequisite to getting accommodations, but oftentimes, getting this for mental health disabilities can be harder. Given the delays in mental health services, students do not receive their documentation in a timely manner to get accommodation requests granted, perpetuating cycles of educational attrition. Additionally, the stigma surrounding mental health poses concerns about the confidentiality of health information.

There have been some improvements to short term accommodation processes, such as the implementation of 72-hour accommodations without medical verification found at institutions like Brock University.⁴⁵ However, these measures have not been extended into the broader accommodations process, which still lacks standardization across the province and serves as an accessibility barrier for students with disabilities.

As such, the Ministry of Mental Health and Addictions and the Ministry of Colleges and Universities should work in collaboration to develop best practices for a whole-of-community approach that supports comprehensive and accessible mental health services for students with disabilities. This will help ensure all relevant agents fully support students through their mental health care. The province should also provide post-secondary institutions with annual funding for counselling services and resources, to address the growing need for more mental health support. Lastly, the Ministry of Colleges and Universities and the Ministry of Mental Health and Addictions should work in collaboration to develop a strategy to increase support for students with emerging mental health disabilities, particularly in communities with a large young adult population (such as communities near post-secondary institutions).

⁴² Ontario Human Rights Commission, "Academic accommodations and systemic barriers," *Ontario Human Rights Code*, n.d., <https://www.ohrc.on.ca/en/learning-mind-inquiry-report-systemic-barriers-academic-accommodation-post-secondary-students-mental/academic-accommodations-and-systemic-barriers>

⁴³ Ibid.

⁴⁴ Ontario Human Rights Commission, "Policy on accessible education for students with disabilities,"

⁴⁵ "Medical Self-Declaration Form Short term: Up to 72 hours (under 3 days)," *Brock University*, <https://brocku.ca/registrar/wp-content/uploads/sites/45/Medical-Self-Verification-Form-Short-term-less-than-3-days-1.pdf>

FUNDING ACCESSIBILITY SERVICES

Principle: Students should have access to assistive technologies that are critical to their academic success.

Principle: Students with disabilities should not have to pay out-of-pocket for assistive technologies required to engage meaningfully with post-secondary curricula.

Principle: Attaining accommodations should be a streamlined process.

Principle: Students should not be made to cover the costs associated with testing and documentation for academic accommodations.

Concern: Post-secondary institutions may not have sufficient funds available or allocated towards assistive technologies.

Concern: Assistive technologies are often expensive and inaccessible 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 Ministry of Colleges and Universities should modify the accessibility funding model to be reflective of the total student population rather than only students with disabilities.

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

Accessibility services are a crucial component to making campuses more inclusive for students with disabilities. Without the operation of these offices to their full potential, students may face various administrative barriers to getting adequate supports they need to participate in their education. Students feel the effects of this limited external support, with one noting that accessibility services need the most improvement at their university because “accessibility support is underfunded and understaffed.”⁴⁶

The Accessibility Fund for Students with Disabilities is provided to post-secondary institutions to assist their respective accessibility efforts and obligations under the Ontario Human Rights Code. The funding can be used to support accessibility offices, adaptive technology, professional development, and contractual expenses such as tutoring and note taking.⁴⁷ The fund comes as a portion of operational grants that are allocated to post-secondary institutions from the provincial government.⁴⁸ Concerningly, operating grants from the province have remained stagnant for several years which limits the financial support to institutions and undermines their accessibility initiatives and resources.

As such, 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. The province should also modify the accessibility funding model to be reflective of the total student population rather than only students with disabilities. This will offer flexibility for institutions to support all their students who require accommodations, since this stretches far beyond those formally

⁴⁶ Unpublished quote from OUSA's 2022 Ontario Undergraduate Student Survey.

⁴⁷ Ontario Human Rights Commission, “Post-secondary education,”

⁴⁸ Ibid.

diagnosed with a disability. To further strengthen this, the provincial government should provide additional envelope funding through the Accessibility Fund for Students with Disabilities for additional accessibility support services.

ACADEMIC ACCOMMODATIONS

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

Concern: Post-secondary accessibility policies lack a consistent review process leaving many policies outdated and student concerns overlooked.

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 which states the right to equal treatment as it pertains to services for persons with disabilities. Under the Code it states, "Education providers have a legal duty to accommodate the needs of students with disabilities who are adversely affected by a requirement, rule or standard. This duty to accommodate includes both procedural and substantive obligations. Organizational policies, procedures and practices must satisfy both of these components."⁴⁹ 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.

Students have expressed to OUSA the various reasons that instructors did not grant accommodations in our 2022 Ontario Undergraduate Student Survey. These reasons include family bereavement, mental health, and even medical procedures. In fact, one student was not available to hand in an assignment in-person due to a medical procedure, and "just got late marks deducted."⁵⁰ Another student mentioned, "My disability accommodations are sporadically respected, with a great deal of follow up and advocacy on my part."⁵¹ 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. The appropriateness of academic accommodations is based on their ability to provide students with disabilities with equal opportunity for purposeful access to education. 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. 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. Professors are required to meet AODA requirements which is not the case. Many professors are not even aware that they are required to do this or do not know what tools and strategies are available to improve the accessibility of courses. However, some may view universal design as something that is optional within the university learning environment. The integration of Universal Design for Learning (UDL) principles into all areas of post-secondary education, beyond academics, is a key avenue for institutions to make their services more proactively accessible. However, uptake of UDL in Canada has been slow and staff have reported challenges in

⁴⁹ Ontario Human Rights Commission, "Accommodating students with disabilities - Roles and responsibilities (fact sheet),"

⁵⁰ Unpublished quote from OUSA's 2022 Ontario Undergraduate Student Survey.

⁵¹ Ibid.

receiving direction from senior administration on how to implement UDL in their work.⁵² Despite staff knowing about the importance of UDL, with some even engaging in grassroots mobilization to incorporate it in their services, support from high-level administrators and accountability mechanisms to monitor this progress are seldom.⁵³ Staff are not always given the time or capacity to enhance their UDL initiatives, such as engaging in training or updating their protocols.⁵⁴ There is also no consistent review process in place for post-secondary accessibility policies, and instructors have mentioned that there is a lack of accountability measures within institutional policies that encourage the implementation of UDL principles.⁵⁵ They have also expressed that much of incorporating UDL into their classes requires time, capacity, and resources that they are not afforded.⁵⁶

As a result, OUSA recommends 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: Any documentation on which accommodations are based should not require the disclosure of a diagnosis, but should instead focus on functional limitations that directly relate to the accommodations being asked for.

Principle: Province-wide mental health documentation standards should be 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.

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

Concern: The standards surrounding the resubmission of disability documentation may place undue pressure and hardship on students who are seeking accommodations.

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.

Concern: Students often face difficulties attaining required documents such as doctors' notes which are necessary for academic accommodations.

Recommendation: The government should task the Higher Education Quality Council of Ontario with conducting a review of province-wide documentation standards across institutions in the area of mental health.

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 province-wide documentation standards do not require students with registered permanent disabilities to seek additional forms of documentation.

⁵² Courts et al., *HEQCO's Dialogues on Universal Design for Learning*,

⁵³ Ibid.

⁵⁴ Ibid.

⁵⁵ Ibid.

⁵⁶ Ibid.

Recommendation: The provincial government should expand the Ontario Health Insurance Program and university health insurance plan coverage to include the cost of documentation for international and out-of-province students.

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

The variability in documentation requirements for students with disabilities poses a barrier to students. Institutions address accommodations in different ways, with some schools making it more difficult than others to prove proof of the disability. The variability is problematic because “the lack of consistency creates potentially unequal opportunities to acquire accommodations for students who identify with a learning disability.”⁵⁷ 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. Obtaining documents from medical professionals only to be told that they are not acceptable makes the process cumbersome and inequitable for students, and acts as additional labour which is not always recognized as such.⁵⁸ This places undue hardship on students to get academic supports they deserve and, in some cases, results in extreme delays that do not end up serving any benefit to students. For example, a student in Nova Scotia shared that it took about a semester and a half before getting the necessary accommodations granted with “appropriate” documentation.⁵⁹ Another student mentioned, “It took me three months to get my paperwork sorted out: that’s most of a semester and I didn’t have any chance to utilize accommodations.”⁶⁰ Hence, the province should conduct an extensive review of existing academic accommodation standards at Ontario universities to assess the adequacy of the range of accommodations provided. Additionally, the provincial government should mandate that province-wide documentation standards do not require students with registered permanent disabilities to seek additional forms of documentation. 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. The provincial government should expand the Ontario Health Insurance Program and university health insurance plan coverage to include the cost of documentation for international and out-of-province students.

Several students in our 2022 Ontario Undergraduate Student Survey commented that the need for documentation is a burden and hindrance to getting their accommodations granted. One stated, “I had a very difficult time with the paperwork to register my disability and it caused me significant stress, and during the pandemic, some of the teachers did not adjust their material adequately.”⁶¹ Students have expressed that they cannot always get the necessary documents on time, especially given that life circumstances can change in an instant. This is particularly difficult for students with mental health disabilities, where its non-visibility combined with stigmatization can make it harder for either: a) medical professionals to approve and provide documentation; and b) instructors to accept said documentation.⁶² In addition, long wait times within mental healthcare only further delay students getting access to a service provider that can produce documentation. This is why the provincial government should task the Higher Education Quality Council of Ontario with conducting a review of province-wide documentation standards across institutions in the area of mental health, as well as

⁵⁷ Landscape of Accessibility and Accommodation in Post-Secondary Education for Students with Disabilities,”

⁵⁸ Cynthia Bruce and M. Lynn Aylward, “Accommodating Disability at University,” *Disability Studies Quarterly* 41, no.2 (2021), <https://doi.org/10.18061/dsq.v41i2>

⁵⁹ Ibid.

⁶⁰ 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, ON: Queen’s University and St. Lawrence College Partnership Project, 2015), <https://campusmentalhealth.ca/wp-content/uploads/2018/03/Guidelines-for-Academic-Accommodations.pdf>

⁶¹ Unpublished quote from OUSA’s 2022 Ontario Undergraduate Student Survey.

⁶² Ontario Human Rights Commission, “Policy on accessible education for students with disabilities,”

reviewing the assessment requirements for students seeking academic accommodations to ensure that these requirements do not cause undue hardship on students. The aforementioned development of standards can build upon the recommendations made by researchers at Queen's University and St. Lawrence College in 2015 on mental health documentation guidelines.⁶³

PROCESS

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

Principle: Students should have a safe, supportive, and equitable environment throughout the process of seeking accommodations.

Concern: Students with disabilities have a greater chance of facing academic strain which may be further exacerbated when navigating university processes.

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

Concern: Students often experience barriers when seeking access to the academic accommodations they need to reach their full potential of achieving success within a post-secondary institution.

Concern: During the registration process for academic accommodations, students do not receive interim accommodation support.

Concern: Delays in the implementation of academic accommodations can severely impact a student's ability to participate academically.

Recommendation: The provincial government should mandate for post-secondary institutions to sufficiently communicate with and inform students about the range of accessibility services available to them.

Recommendation: The provincial government should create a set of guiding standardized principles for an interim accommodation process 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 utilize best practices provided by HEQCO to mandate the training of instructors and staff on how to best facilitate academic accommodations.

Recommendation: The provincial government should require universities to disclose support systems on their website in easily accessible formats.

As eluded in the previous section, the process for getting accommodations can be burdensome and prolong access to academic supports. When students transition from K-12 education to university, they must provide documentation that formally recognizes their disability warranting accommodations. Academic supports offered in high school are meant to “ensure student success” while supports in post

⁶³ Condra and Condra, *Recommendations for Documentation Standards*,

secondary are merely meant to provide equitable opportunities.⁶⁴ Consequently, research indicates that 86% of students receive less accommodations in university than in high school.⁶⁵ Evidently, the transition between the two systems is a critical time to ensure a continuation of support and avoid fragmented accommodations. This is why the provincial government should mandate for post-secondary institutions to sufficiently communicate with and inform students about the range of accessibility services available to them.

Based on the above, mitigating delays in getting accommodations is a process that needs to start proactively, before students begin their education. This requires getting in contact with accessibility offices early on to complete intake forms and be informed about the necessary documentation.⁶⁶ This is why the provincial government should require universities to disclose support systems on their website in easily accessible formats. Much of this work can occur online through institutional accessibility office websites. However, many of these webpages do not comply with Web Content Accessibility Guidelines (WCAG) 2.0 Level AA standards. An examination of these webpages found that many of them did not fully follow various guidelines, including having text-alternatives, navigable and accurate links, adaptable web formats, and distinguishable visual and auditory elements.⁶⁷ This suggests that the mechanism used to increase accessibility is inherently and ironically inaccessible itself. Thus, as a legal obligation under AODA, it is crucial that the support systems communicated on university websites ahead of a student's entry into post-secondary follows appropriate web standards for accessibility.

Knowing that the acquisition of appropriate documentation can be lengthy, it is critical that interim supports be provided. As indicated in the prior section, many students going through the accommodation request process have several months pass before getting their requests granted, by which point they are unable to maximize the benefit they reap from the accommodation. In their recommendations of accessibility guidelines for mental health disabilities, researchers suggest interim accommodations as a stopgap measure to address both students' needs and staff's desire to help.⁶⁸ As a result, the provincial government should create a set of guiding standardized principles for an interim accommodation process so that all students with disabilities have access to the same level of interim accommodations and support.

The above recommendations can be informed by more research and exploration of the process to receive accommodations. 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, and then utilize these best practices to mandate the training of instructors and staff on how to best facilitate academic accommodations.

FINANCIAL BARRIERS

INADEQUATE FINANCIAL ASSISTANCE AND INCREASED COSTS

Principle: All academically qualified students should have access to post-secondary education, regardless of their disability status.

Principle: Students who receive Ontario Disability Support Program (ODSP) should not be financially penalized for living in residence.

⁶⁴ Parsons et al., "Students with Disabilities Transitioning from High School to University in Canada: Identifying Changing Accommodations," *Exceptionality Education International* 30, no.3 (2020): 64-81, <https://ojs.lib.uwo.ca/index.php/eei/article/view/13427/11026>

⁶⁵ Ibid.

⁶⁶ Paige Heidi Walker, "Bridge or Barrier: An Examination of the Accessibility of Ontario University Accessibility Services Offices Webpages," [thesis], *Mount Saint Vincent University*, 2022 <https://ec.msvu.ca/server/api/core/bitstreams/bb9fdaaf-8f40-4feb-a6da-224f9ed6bdf/content>

⁶⁷ Ibid.

⁶⁸ Condra and Condra, *Recommendations for Documentation Standards*,

Principle: Students who have permanent, short-term or temporary disabilities 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 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 loans to finance their post-secondary education.

Concern: A student's physical and mental accessibility needs may lead to financial burden when pursuing post-secondary education.

Concern: Students that are on ODSP often do not receive enough OSAP to cover residence costs, and other costs associated with post-secondary education

Concern: There are communication gaps for the eligibility of OSAP and ODSP for students who are eligible for both programs, which can result in students who may be ineligible to apply for OSAP along with ODSP.

Concern: Certain disabilities are inconsistently defined across Ontario institutions, preventing some students from being able to access intended financial support.

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

Recommendation: The provincial government should allow all ODSP recipients to be qualified for OSAP.

Recommendation: The Ministry of Colleges and Universities should amend OSAP criteria to ensure that students with temporary disabilities are able to access federal funding.

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.

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 permanent or temporary disabilities.

Disabled people typically face increased costs of living, and this is especially true for students who have additional expenses associated with documentation, residence, equipment, and assistive devices. People with disabilities often live with a caregiver to provide the care that they need, and it is even more challenging if they are a student living in residence since ODSP only allows you to have one "main" address to pay rent towards. People with disabilities often depend on the Ontario Disability Support Program (ODSP) to survive. ODSP is typically not enough to live on; as of 2023, the maximum amount disbursed is \$1,308 per month which is significantly less than the actual cost of living. To illustrate this difference in a student context, the University of Toronto's Financial Planning Calculator estimates non-educational expenses to be about \$2,038 per month.⁶⁹

The OSAP calculation assesses both educational and non-educational expenses. When a student on ODSP also applies for OSAP, the latter assessment does not consider the non-educational portion under the

⁶⁹ Calculated based on a first-year arts and science student living off campus with others, and includes housing and utilities, food, transit, phone, health and personal care, and entertainment costs.

assumption that ODSP will cover these costs.⁷⁰ However, since ODSP is not enough to cover living costs on its own, the deduction of this from OSAP severely strains a student's financial capacity to pay for non-educational costs. In some cases, OSAP has completely deemed students ineligible for financial aid because of their ODSP status. Further, the doubling of the Canada Student Grants over the COVID-19 pandemic prompted ODSP to reduce funding from their recipients even more because of this additional aid to non-educational costs. The adjustments made between these two programs in response to one another and the communication gaps that exist can significantly undermine a disabled student's ability to afford their education. As one student in our 2022 Ontario Undergraduate Student Survey said, "I am on ODSP and they have enacted a new policy that takes away my ODSP money for any strictly non essential school funding from OSAP. This makes it hard for me to afford living while I am in school and means I have to work, which takes away from my ability to do well in school when my disability is taken into consideration."⁷¹ With the rising cost of living and tuition, the need for financial stability financial aid has never been greater. This is why the provincial government should allow all ODSP recipients to be qualified for OSAP. The potential for a student to be ineligible for OSAP because of their ODSP funding seriously impacts their ability to afford post-secondary, despite critically needing both sources of funding. The majority of a student's OSAP funding is distributed as a loan, and with the recent clawbacks, students living with disabilities often do not have enough assistance to both cover their OSAP on top of dealing with the financial burden of living with a disability.

OSAP is funded through contributions from the provincial and federal governments. For a period of time, those with temporary disabilities were limited in their access to federal funding because of previous eligibility criteria. While that has since been addressed, differences in income thresholds between the provincial and federal governments make eligibility for each portion of OSAP different. Therefore, a student could be eligible for federal funding, but not the provincial part of their OSAP funding. The Ministry of Colleges and Universities should amend OSAP criteria to ensure that students with temporary disabilities are able to access federal funding.

Ontario and Canada also provide additional sources of funding outside of OSAP, including the Bursary for Students with Disabilities (BSWD) and the Canada Student Grant for Services and Equipment – Students with Disabilities. As the name implies, this funding is used to support purchases related to disability equipment and services required for post-secondary studies.⁷² These grants may also cover the costs of psycho-educational assessments, however, this is only applicable if the assessment is completed within 6 months of starting their studies.⁷³ The cost of these assessments can reach thousands of dollars – for example, the Centre for Mental Health Research and Treatment at the University Waterloo charges up to \$2,200 for a comprehensive psychological assessment.⁷⁴ Hence, 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. This provides buffer room for students who obtain these assessments within 6 months of beginning their studies, closer to the timeline when they would actually be getting ready for post-secondary education.

Students placed on OSAP suspension often go through more financial hardships due to the lack of funding, coupled with the stress of being on probation or suspension. Students with disabilities will have various reasons for dropping courses and the implications of being placed on OSAP probation or restriction severely limit their access to financial aid. To mitigate this, 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 permanent or temporary disabilities.

⁷⁰ Ministry of Children, Community and Social Services, "Ontario Disability Support Program policy directives for income support: 5.11 – Post-secondary education," *Government of Ontario*, last modified October 3, 2022,

<https://www.ontario.ca/document/ontario-disability-support-program-policy-directives-income-support/511-post-secondary>

⁷¹ Unpublished quote from OUSA's 2022 Ontario Undergraduate Student Survey.

⁷² "2022-23 Ontario Bursary for Students with Disabilities (BSWD) Canada Student Grant for Services and Equipment – Students with Disabilities (CSG-DSE)," *Government of Ontario and Government of Canada*, n.d., <https://osap.gov.on.ca/prdosapconsum/groups/forms/documents/forms/prdro22748.pdf>

⁷³ Ibid.

⁷⁴ Centre For Mental Health Research And Treatment, "Arranging Services & Fees," *University of Waterloo*, n.d., <https://uwaterloo.ca/mental-health-research-treatment/clinical-services-resources/arranging-services-fees>

We have seen some steps forwards, such as the increase in Canada Student Grants and federal loan forgiveness. Yet it is not enough to cover the massive stress and financial hardships that are occurring today.

TRANSIT

Principle: Students should have access to services, supports and infrastructure to ensure that transportation is accessible to students with disabilities.

Principle: Students with disabilities should have mobility options, reduced transportation costs, and reduced barriers or obstacles to accessing academic pursuits and environments.

Concern: Students with disabilities at post-secondary institutions face physical and financial barriers that create obstacles to accessing academic, social, or cultural environments on campuses.

Concern: Post-secondary institution infrastructure is limited in accessibility design and seasonal insight posing significant transportation barriers for students.

Recommendation: The Ministry of Transportation should ensure that all municipal transit systems include modernized transportation policy and innovative new technology in compliance with the AODA.

Recommendation: The province should encourage post-secondary institutions to alleviate financial burdens on students with disabilities through specialized services and supports.

Recommendation: The Ministry of Colleges and Universities in collaboration with the Ministry of Transportation should create improvements to existing transit information communications systems, including increased supports through virtual or in-person alternatives.

Recommendation: The MTO should increase operational funding for municipal transit agencies to maintain and increase transit and para-transit service frequency to universities.

Accessible transit is a critical component of creating an inclusive and equitable university or academic setting. Students with disabilities, mobility challenges, or other impairments should not have to face unnecessary barriers in accessing transportation options that allow them to fully participate in the academic environment.

Accessible transit is essential to ensuring that all students have equal access to educational opportunities. Without accessible transit, students with disabilities or mobility challenges may find it difficult or impossible to attend classes, access campus resources, participate in extracurricular activities, and engage in other aspects of campus life. This can limit their ability to fully participate in the academic environment, leading to unequal opportunities and potential academic setbacks. Moreover, accessible transit promotes diversity and inclusion on campus. By providing accessible transportation options, universities and academic institutions can attract and retain a more diverse student body. This diversity not only enriches the learning environment but also helps to create a more inclusive and welcoming campus culture. In addition, providing accessible transit can also benefit the wider community.

It is also important to note that city maintenance is a key player in enhancing access for disabled students with their transit options. For example, snow banks that accumulate near curbs and bus stops have severely limited mobility for disabled students if said obstacles are not cleared in a timely manner. Many campus public transit options have also been cut, as seen in London with Western University and Oshawa

with Ontario Tech University, which compounds the effects of inaccessible transit options.⁷⁵ Hence, the Ministry of Transportation should increase operational funding for municipal transit agencies to maintain and increase transit and para-transit service frequency to universities.

The Ontario Human Rights Code is a key piece of legislation that outlines the rights of individuals with disabilities in Ontario, including their right to accessible transit. The Code requires that all providers of goods, services, and facilities, including transportation services, take steps to ensure that they are accessible to people with disabilities. This includes providing accessible transit options, such as accessible buses, trains, and subways. Furthermore, the Code requires that accessible transportation options be provided in a way that is equal to that provided to non-disabled individuals. This means that accessible transportation options should be available at the same times, at the same locations, and for the same costs as non-accessible options. Failure to provide equal access to transportation can be considered discrimination under the Code. Currently, students are experiencing these key cases of discrimination as transit systems are not openly accessible for all students. All bus routes and buses should have clear coloured signage with large font, bus times and routes available in a schedule and live tracking in a virtual format, audio announcements, ramps, and accessible seating.⁷⁶ The cost of providing accessible transit should not be downloaded onto students and so, the province should encourage post-secondary institutions to alleviate financial burdens on students with disabilities through specialized services and supports.

In order to execute on this mission the Ministry of Transportation must ensure that it is leveraging updated technology to promote the use of public transportation systems within densely student populated areas. This new technology should be in accordance with AODA and the OHRC as a means to bring accessible means of transportation to all students. Additionally, the Ministry of Colleges and Universities in collaboration with the Ministry of Transportation should create improvements to existing transit information communications systems, including increased supports through virtual or in-person alternatives.

⁷⁵ “Ontario Tech Student Union slamming DRT’s proposed service changes,” *Durham Radio News*, December 6, 2022, <https://www.durhamradionews.com/archives/162634>; Megan Stacey, “Driver shortage forces London Transit to cut five popular routes,” *The London Free Press*, December 5, 2021, <https://lfpres.com/news/local-news/driver-shortage-forces-london-transit-to-cut-five-popular-routes>

⁷⁶ Lisa Kovac, “Ontario Public Transit: Accessible for Everyone,” *Accessibility for Ontarians with Disabilities Act*, July 27, 2018, <https://aoda.ca/ontario-public-transit/>

POLICY STATEMENT

Whereas: Students with disabilities should be able to navigate their university experience without the undue hardship of advocating for their rights.

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 that face multi-faceted intersectional structures of disability and cultures should be provided alternative avenues/services that identify, target and advocate for invisible disabilities.

Whereas: All students attending post-secondary institutions should have the opportunity to access AODA training and knowledge within their respective fields and disciplines.

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

Whereas: Students with permanent and temporary disabilities should be able to easily locate and access accessible parking on campus.

Whereas: Students with disabilities should not be impeded from accessing all spaces and services on campus.

Whereas: Students with disabilities should not face undue hardship when locating and accessing washrooms on campus.

Whereas: Students should have visual aids outlining accessible facilities available to them.

Whereas: All students should have the opportunity to participate in all programming that accommodates their accessibility needs.

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

Whereas: Accurate information on campus support services should be available and publicized to all incoming students.

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.

Whereas: Orientation events should be designed to create an inclusive environment for all students of all abilities.

Whereas: All students should have 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: All students should have equitable access to safe and meaningful employment opportunities regardless of ability.

Whereas: All student staff should get the accommodations they require for a barrier-free employment experience.

Whereas: Post-secondary institutions must be equipped to fulfil their duty to accommodate students with disabilities and accessibility needs.

Whereas: Students with disabilities must have an equitable opportunity to reach their highest level of academic potential.

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

Whereas: Students with disabilities must be able to receive service and support in a timely manner from accessibility offices.

Whereas: University instructors and staff must be trained on how to implement the principles of Universal Design for Learning in the classroom.

Whereas: All students must have the right to arbitration from an independent body in the event of a dispute regarding academic accommodations.

Whereas: Students with disabilities deserve access to mental health counselling that addresses their unique needs and intersecting identities.

Whereas: Mental health resources should be equitably available and accessible to persons with disabilities.

Whereas: Students should have access to assistive technologies that are critical to their academic success.

Whereas: Students with disabilities should not have to pay out-of-pocket for assistive technologies required to engage meaningfully with post-secondary curricula.

Whereas: Attaining accommodations should be a streamlined process.

Whereas: Students should not be made to cover the costs associated with testing and documentation for academic accommodations.

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

Whereas: Any documentation on which accommodations are based should not require the disclosure of a diagnosis, but should instead focus on functional limitations that directly relate to the accommodations being asked for.

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

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

Whereas: Students should have a safe, supportive, and equitable environment throughout the process of seeking accommodations.

Whereas: All academically qualified students should have access to post-secondary education, regardless of their disability status.

Whereas: Students who receive Ontario Disability Support Program (ODSP) should not be financially penalized for living in residence.

Whereas: Students who have permanent, short-term or temporary disabilities 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 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 loans to finance their post-secondary education.

Whereas: Students should have access to services, supports and infrastructure to ensure that transportation is accessible to students with disabilities.

Whereas: Students with disabilities should have mobility options, reduced transportation costs, and reduced barriers or obstacles to access academic pursuits and environments.

Be it resolved that: The Ministry of Colleges and Universities should collaborate with the Ministry for Seniors and Accessibility and students with disabilities to create standardized accessibility training based on the Postsecondary Education Standards Development Committee 2022 Final Recommendations Report.

Be it further resolved that (BIFRT): The Ministry of Colleges and Universities should ensure that the post-secondary accessibility training is intersectional and aims to address the additional barriers racialized and other marginalized people with disabilities may face.

BIFRT: The Ministry of Colleges and Universities should mandate that institutions administer a post-secondary specific AODA training to all university personnel.

BIFRT: The Ministry of Colleges and Universities should mandate that institutions administer a comprehensive and intuitive post-secondary specific AODA training to all staff, student staff, and volunteers.

BIFRT: 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 guidelines for incorporation of universal design for teaching and learning into their classrooms.

BIFRT: The provincial government should mandate that all institutions have an advisory committee dedicated to campus accessibility and require that it is composed of students with disabilities, university personnel, and university stakeholders.

BIFRT: The Ministry of Colleges and Universities should mandate all post-secondary institutions to provide universal parking permits/passes for students with disabilities.

BIFRT: The provincial government should allocate capital funds to universities that 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 (AODA) standards.

BIFRT: The Ministry of Colleges and Universities should mandate that all physical signs, including automatic door openers, include braille.

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 provide envelope funding to universities to equip washrooms with accessibility aids in order to increase the availability of aids such as ceiling lifts and braille signage.

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 develop a set of guiding principles for institutions to enact with regards to the documentation process of receiving support.

BIFRT: The MCU should create a best practises guideline for institutions on how to create fully accessible orientation weeks.

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 (HEQCO) 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 provincial government should provide institutions funding to ensure all on-campus student employment opportunities are accessible to students with disabilities.

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 provide funding to the IDIA to conduct research on standards of practice for post-secondary institutions to provide supports for students with disabilities.

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

BIFRT: 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.

BIFRT: The MCU 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 develop a formal definition of disability that describes individuals with functional limitations that are expected to persist, but not necessarily for their whole life.

BIFRT: The province should mandate that all campuses have a virtual accessibility hub that provides students with support systems and resources to ensure they excel during their university career.

BIFRT: The province should give funding to institutions in order for universities to have their own attendant program.

BIFRT: The Ministry of Colleges and Universities should create a best practices guideline on confidentiality and staff compliance to the Code of Disability Policy.

BIFRT: The Ministry of Mental Health and Addiction and The Ministry of College Universities should work in collaboration to develop best practices for a whole-of-community approach that supports comprehensive and accessible mental health services for students with disabilities.

BIFRT: The Ministry of Colleges and Universities should provide post-secondary institutions with annual funding for counselling services and resources, to address the growing need for more mental health support.

BIFRT: The Ministry of Colleges and Universities and The Ministry of Mental Health and Addictions should work in collaboration to develop a strategy to increase support for students with emerging mental health disabilities, particularly in communities with a large young adult population (such as communities near post-secondary institutions).

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 Ministry of Colleges and Universities should modify the accessibility funding model to be reflective of the total student population rather than only students with disabilities.

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 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 a review of province-wide documentation standards across institutions in the area of mental health.

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 province-wide documentation standards do not require students with registered permanent disabilities to seek additional forms of documentation.

BIFRT: The provincial government should expand the Ontario Health Insurance Program and university health insurance plan coverage to include the cost of documentation for international and out-of-province students.

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

BIFRT: The provincial government should mandate for post-secondary institutions to sufficiently communicate with and inform students about the range of accessibility services available to them.

BIFRT: The provincial government should create a set of guiding standardized principles for an interim accommodation process 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 (HEQCO) to investigate best practices in academic accommodation processes to be adopted by university accessibility services.

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

BIFRT: The provincial government should require universities to disclose support systems on their website in easily accessible formats.

BIFRT: The provincial government should allow all ODSP recipients to be qualified for OSAP.

BIFRT: The Ministry of Colleges and Universities should amend OSAP criteria to ensure that students with temporary disabilities are able to access federal funding.

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 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 permanent or temporary disabilities.

BIFRT: The Ministry of Transportation should ensure that all municipal transit systems include modernized transportation policy and innovative new technology in compliance with the AODA.

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