OUSA

Ontario Undergraduate Student Alliance

POLICY PAPER

Students with Disabilities

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Prepared by:

Laura Bassett, Vice President: University Affairs
Wilfrid Laurier Students' Union, Wilfrid Laurier University

Sarah Letersky, Vice President (University Affairs)
Alma Mater Society, Queen's University

Raelle Ricci, Associate Vice President: University Affairs
Wilfrid Laurier Students' Union, Wilfrid Laurier University

Danielle Pierre, Research Analyst
Ontario Undergraduate Student Alliance

ABOUT OUSA

OUSA represents the interests of over 140,000 professional and undergraduate, full-time and part-time university students at seven student associations across Ontario. Our vision is for an accessible, affordable, accountable, and high quality post-secondary education in Ontario. To achieve this vision we've come together to develop solutions to challenges facing higher education, build broad consensus for our policy options, and lobby government to implement them.

ACKNOWLEDGEMENT

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EXECUTIVE SUMMARY

The concept of "disability" should be interpreted in broad terms including both present and past conditions as well as subjective components based on perceptions of disability. These subjective components determine disability in relation to individuals' interactions with their environment: in the ways buildings are constructed, in the performance standards used to assess individuals, and in the ways individuals are expected to engage in daily activities. This interpretation of disability is referred to as a "social model." This model places responsibility for overcoming accessibility barriers onto entire communities. This OUSA policy paper uses a social model of disability to offer recommendations that ensure all willing and qualified students in Ontario are able to access and excel within the post-secondary education system.

THE ISSUES

Negative Stigma and Limited Support

Accessibility and accommodation are not always recognized as distinct concepts. Without this distinction, individual accommodations are provided in lieu of initiatives that increase the overall accessibility of the community and stimulate systemic change. When accessibility is not made a community matter, the responsibility to overcome barriers is placed on individuals. Students often avoid disclosing their disabilities to avoid this isolating social stigma.

Although support services exist on all OUSA campuses, they are not always accessible due to stigma, cost, and disclosure requirements. Faculty and staff are not always provided with training that would enable them to help students navigate the variety of support services available and little information is made widely available to incoming and current students. The responsibilities of Accessibility Offices are stretched thin and they face expectations to advise students, train faculty and staff, and adhere to government legislation using insufficient resources.

Complicated Academic Accommodations

Much work is being done to appropriately adapt curricula for a range of students, with a range of capacities and abilities, but creating inclusive learning environments remains one of the largest challenges for education providers and their students. As a result, some level of individualized academic accommodation will always be required and this must be made a priority. Without the right accommodations, many students experience difficulty meeting their full academic potential. Full slates of accommodations often take too long to be implemented and students do not often receive accurate information about the variety of accommodations available.

Processes for attaining accommodation are heavily bureaucratic and convoluted. Documentation standards across institutions remain inconsistent, varying between institutions and keeping approaches opaque and confusing. Students must submit their documentation every semester, which can be time consuming and debilitating. Throughout the documentation process students are often forced to stigmatize themselves by disclosing their diagnoses.

Financial Barriers

Despite existing financial aid programs, the barriers experienced by students with disabilities continue to grow. Part of the challenge lays in the ways that the provincial and federal governments share their responsibility to assist these students; access to some federal grant programs is restricted to students with permanent disabilities. Another part lays in students' lack of awareness of assistance programs.

OSAP is not available for part-time students, thereby excluding students who reduce their course loads in order to manage their disabilities. Part-time students with disabilities are also restricted

from receiving admission scholarships. These restrictions only serve to increase the proportion of students living with disabilities who borrow from private lenders to finance their education.

Weak Legislation

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) was enacted to identify, remove, and prevent barriers for people with disabilities across Ontario. However, even with the AODA's five regulatory standards that prescribe ways to dismantle barriers for people with disabilities, students continue to face set backs. Since many campuses are quite old, universities tend to be out of compliance with the Building Code and public sector building standards. Institutions typically leave advocacy on improving accessibility to the Accessibility Offices, leading to unsupported bottom-up approaches to change. This makes change slow and can be difficult for lower administration to navigate.

RECOMMENDATIONS

Remove Social and Systemic Barriers

All campuses must be free from social, physical, and academic barriers that limit accessibility for students with disabilities. To do this, universities must be equipped to implement *universal design for learning* strategies:
- Provincial government and universities should incorporate universal design for learning theories into all infrastructural, instructional, and strategic planning processes;
- Provincial government should ensure institutions follow the Guidelines on Assessing Accommodation Requirements for Persons with Disabilities, to ensure all students are receiving equal treatment;
- Provincial government should require all university Accessibility Offices to operate on a social model of disability; and
- Institutions must require teaching staff to create classes using the Universal Design for Learning pedagogy.

Any conception of accessibility must include an open and accepting community of students, faculty, and staff. Students should not feel like their disability is a limitation and there should be opportunities for them to find others who share similar life experiences. Any effort to dismantle *social barriers* should involve:
- A provincial mandate that institutions provide comprehensive training to faculty, front line staff, and student leaders to help reduce and eliminate stigma as a barrier;
- Institutional integration of stigma reduction strategies into core annual events; and
- Assurance that students have the autonomy to choose whether or not they want to disclose their diagnoses.

Adequate information on campus support should be available and widely publicized to prospective students throughout the registration process and prior to the start of each academic year. In order to improve students' *transitions* into university:
- Ontario Universities' Application Centre (OUAC) should list accommodation requirements and procedures for every Ontario campus,
- All universities should provide summer transition programs for incoming students with disabilities,
- Information on disability services and summer transition programs should be readily available to all students, and
- Government should outsource research into the most effective types of transition programs and ensure consistency across institutions.

Comprehensive and flexible support services must be available for students with all types of disabilities. The provincial government could help improve *support services* for students with disabilities by:

- Providing enveloped funding for Accessibility Offices, to ensure the proper training of faculty and staff on disability accommodations and support services;
- Funding a central intake officer or case manager at every postsecondary institution;
- Participating in consultations every two years with Accessibility Offices to ensure current funding needs are being met; and
- Providing enveloped funding for program development within Accessibility Offices, if funding is determined insufficient through the consultation process.

Streamline Academic Accommodation Processes

All students should be accommodated for their disability, in accordance with Ontario Human Rights Commission policies, up to the point of undue hardship for the institution. Students should not be required to disclose their diagnoses or disabilities, through documentation practices or otherwise. While Accessibility Offices should be responsible for organization and process, accommodation should be a priority for the whole university community.

The standards for proving the presence of a disability (and associated limitations) present a significant barrier to students seeking academic accommodation. These standards should be consistent for all postsecondary students. *Documentation* practices could be improved if:
- Institutions provided accommodations based on functional limitations and not specific diagnoses;
- Provincial government mandated province-wide documentation standards and guidelines to ensure students with disabilities have adequate access to accommodations;
- Institutions did not require students with permanent disabilities to seek additional documentation when their disability impedes their ability to succeed in the classroom;
- Provincial government extended OHIP coverage to include doctors' notes for students with disabilities when they require accommodation relating to their disability;
- Institutions negotiated with UHIP to extend coverage to include doctors' notes for students with disabilities when they require accommodations related to their disabilities;
- Provincial government mandated that students with permanent disabilities only have to provide documentation of their disability once upon arriving to the institution; and
- Students were not required to hand their accommodation documentation directly to a professor.

Academic accommodations must be consistent, reliable, and easily accessible. Institutions could improve their *processes* for providing academic accommodations by:
- Delivering accommodations in a timely manner that is reflective of important dates and course schedules,
- Providing more information on where students can access varied and flexible academic accommodations within the classroom, and
- Making interim accommodations available for students with disabilities while they are waiting for their full accommodations.

Faculty and staff need more sufficient training to enable them to assist students who need accommodations in their classrooms and institutions need more support in providing this training. To provide more appropriate *faculty training*:
- Institutions must ensure faculty and teaching assistants incorporate inclusive learning into their curriculum, and
- Accessibility Offices should be responsible for working with instructors and staff to implement students' academic accommodations.

Dismantle Financial Barriers

Students with disabilities—either temporary or permanent—must be provided with adequate financial assistance to cover the costs associated with their disability. Students with disabilities require financial assistance that covers their *increased costs* and recommend that:

- Provincial government lobby federal government to expand the eligibility criteria for federal grants and bursaries to include students with temporary disabilities;
- Institutions offer admissions scholarships to all students with disabilities, not just full-time students; and
- Provincial government lobby federal government to expand the Canada Student Grant for Persons with Disabilities to cover the costs of psychological assessments in their entirety.

Students with disabilities should have access to adequate financial resources, even without aid from private lenders. To decrease these students' *reliance on private lenders*:
- Students with severe permanent disabilities should be automatically exempt from the OSAP expectation of a minimum pre-study period contribution;
- Every institution must extend full scholarship eligibility to students with disabilities who are taking a reduced course load; and
- OSAP should be available for part-time students with disabilities.

All students should have access to information about the financial assistance available to them when they attend postsecondary school. The provincial government could help to increase *awareness of financial assistance options* by:
- Partnering with accessibility centres to increase awareness, and provide education and information about the financial aid available for students with disabilities; and
- Encouraging Accessibility Offices to incorporate financial literacy specific to students with disabilities into their core functions and job descriptions.

Strengthen the AODA

All universities must be compliant with the AODA by 2025. This will require institutions to adhere to all timelines referenced in the Public Sector: 50+ Employees Standard and make their annual accessibility reports public. In meeting these goals, all accessibility initiatives should be grounded in the AODA's principles of dignity, independence, integration, and equal opportunity. Since universities are experiencing particular difficulties with AODA compliance in regard to their *built environments*, students recommend that the provincial government:
- Require all areas on campus be accessible and not reserve the AODA building standard to newly constructed buildings or redevelopments,
- Make funds available to universities to make their existing buildings compliant with AODA building standards, and
- Enter into agreements with institutions to provide incentives for exceeding minimum compliance standards.

An education specific standard should exist and be enforced within the AODA. Provincial government should use *an education standard* to:
- Cover topics such as physical access, support services, training, timelines, universal design principals, and permanent programming to educate students on accessibility;
- Encourage senior administration to take a leadership role in ensuring issues of accessibility are heard, understood, and responded to in a timely manner;
- Require the provincial ombudsman to oversee issues of non-compliance in universities; and
- Mandate that municipalities include meaningful representation from students on their accessibility advisory committees.

Since December 31, 2015, all universities have been required to produce accessible textbooks, however *inaccessible course materials* are still broadly used:
- Provincial government should enforce AODA requirements that any courseware and course materials required by a public institution have alternate accessible formats available upon request, and
- Accessible course materials should be available in a reasonably timely manner.

INTRODUCTION

> **Principle:** All willing and qualified students in Ontario must be able to access and excel within Ontario's post-secondary education system.

All willing and qualified students in Ontario must be able to access and excel within Ontario's post-secondary system regardless of their perceived disability. Despite improved access and support for students with disabilities in higher education, significant barriers to their persistence and success still remain. Although it is difficult to quantify the proportion of students with disabilities attending university with certainty, multiple sources show that those with disabilities continue to access and complete university at lower rates than those without.[1]

Herein, students discuss systemic, social, structural, financial, and legislative barriers experienced by students with disabilities attending Ontario's universities. This policy paper begins by providing the reader with background information on definitions and conceptualizations of disability, principles of accessibility and accommodation, and the prevalence of different disability types among OUSA's member institutions. This section is intended to provide a philosophical basis for the policy that follows.

Critical disability theory and a social understanding of disability are foundational to these policy recommendations. On these grounds, universal design is recommended as a key component of framing the responsibility for dismantling barriers to access as that of the entire university community. By designing more accessible campuses, resources can be used more effectively to provide individualized accommodations for those who need them. Institutions can also implement more effective stigma reduction strategies by sharing the responsibility for removing barriers with their students.

Barriers come in multiple forms for students who have disabilities. Just as disabilities can be invisible, so too are some of the barriers students experience. This policy paper identifies several informational barriers for prospective and current undergraduate students that must be overcome in order to optimize summer transition programs, on-campus support services, and academic accommodations. Financial barriers are also discussed in regards to the elevated costs of education for students with disabilities and the restrictive eligibility criteria in financial assistance offerings. Lastly, this policy will offer recommendations for strengthening the legal basis by which universities must accommodate students with disabilities under the Accessibility for Ontarians with Disabilities Act (AODA).

At the highest level, students desire universally accessible and inclusive campuses that empower students with disabilities to meet their full academic potential. This policy paper has been created by student leaders in consultation with their constituents who identify as having disabilities. These principles, concerns, and recommendations represent their vision for a more accessible, affordable, and higher quality university experience for students with disabilities.

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[1] Ursula McCloy and Lindsay DeClou, *Disability in Ontario: Postsecondary education participation rates, student experience and labour market outcomes* (Toronto: Higher Education Quality Council of Ontario, 2013).

BACKGROUND

DEFINING & UNDERSTANDING DISABILITY

"The Human Rights Code comprehensively defines disability as:

(a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
(b) a condition of mental impairment or a developmental disability,
(c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
(d) a mental disorder, or
(e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997."[2]

"Disability" should be interpreted in broad terms and include both present and past conditions, as well as subjective components based on perceptions of disability.[3] In a very real sense, disability is socially constructed.[4] Critical disability theory adds to this notion by conceptualizing disability as an issue of politics and power (or powerlessness), power over, and power to, instead of issues of medical health or sensitivity and compassion.[5] Critical disability theory strives to target and dismantle assumptions of biological and medical models of disability (the idea that disability rests in an individual's physical body).[6] Under the tenets of critical disability theory, whether a person is considered disabled is highly dependent on the social organization of society: in the way buildings and transport systems are constructed, in the performance standards used to assess individuals, and in the ways individuals are expected to engage in daily activities.[7] A social understanding (or model) of disability has no essential nature; depending on what is valued in certain socio-political circumstances, specific personal characteristics are understood as defects and as a result manufacture disability.[8]

An example of the medical model would be a student with a hearing impairment requesting the professor to use a microphone. In this example, it would be on the student to ask for the accommodation, as it is they who have the disability. Whereas in the social model, the onus would be on the professor to proactively make their classroom as accessible as possible and ensure that

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[2] Ontario Human Rights Commission, *Policy and guidelines on disability and the duty to accommodate* (Toronto: Ontario Human Rights Commission, 2009), 6.
[3] Ibid.
[4] Alison S. Gable, "Disability theorising and real-world educational practice: a framework for understanding," *Disability & Society* 29, no. 1 (2014): 86-100.
[5] Richard Devlin and Dianne Pothier, "Introduction: Toward a Critical Theory of Dis-Citizenship," *Critical Disability Theory: Essays in Philosophy, Politics, Policy, and Law*, ed. Dianne Pothier and Richard Devlin (Vancouver: UBC Press, 2006), 1-24.
[6] Ibid.
[7] Ibid.
[8] Ibid.

all students can hear the lecture. The social model recognizes that society can do a lot to limit disabling barriers, instead of putting the onus on individuals to overcome barriers alone. [9]

In this way, "issues of disability are not just questions of impairment, functional limitations, or enfeeblement; they are issues of social values, institutional priorities, and political will."[10]

Barriers to educational participation can be attributed to the persistence of medical or biological models of understanding disability coupled with some social models' inability to gain traction in educational systems.[11] However, social models of disability dictate that the responsibility to acknowledge, respect, and accommodate disability rests in society as a whole.[12] This collective responsibility is much more consistent with the principles of the Human Rights Code and the Accessibility for Ontarians with Disabilities Act and as such, social models of disability and critical disability theory provide the most viable frameworks for addressing disability and inclusion in higher education.

PRINCIPLES OF ACCOMMODATION AND ACCESSIBILITY

"Accommodation is a means of preventing and removing barriers that impede students with disabilities from participating fully in the educational environment."[13] Under the Ontario Human Rights Code, accommodations must be provided in ways that meet the following three goals (or principles):

1) Respect for dignity – human dignity encompasses individual self-respect and self-worth: accommodation should be provided to empower students and eliminate marginalization and stigmatization;
2) Individualized accommodation – students' needs are unique and requests for accommodation should be considered individually, not on the basis of categories, labels, or generalizations; and
3) Inclusion and full participation – all students should be given the opportunity to access and participate in their academic environment without experiencing significant barriers.[14]

Similarly, the regulatory standards used to implement the Accessibility for Ontarians with Disabilities Act require organizations to make their policies and services consistent with the following four core principles:

1) Dignity: treating individuals as valued and deserving of effective and full services, not as an afterthought or in ways that force them to accept lesser services, quality, or convenience;
2) Independence: allowing individuals freedom to make their own choices and to complete tasks in their own way;
3) Integration: providing the same services in the same place and in the same or similar ways to all individuals to the fullest possible extent; and

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[9] Gable, "Disability theorising, 87.
[10] Ibid, 9.
[11] Ibid.
[12] Ibid.
[13] Ontario Human Rights Commission, *Guidelines on accessible education* (Toronto: Ontario Human Rights Commission, 2009), 7-9.
[14] Ibid.

4) Equal opportunity: ensuring individuals with disabilities have the same chances, options, benefits, and results as others without requiring them to exert significantly more effort to access or obtain services.[15]

PREVALENCE OF DISABILITY TYPES

In our 2015 survey of the OUSA membership, 19 percent of respondents identified themselves as having a disability. As illustrated in **Figure 1**, psychiatric disabilities were by far the most prevalent among these students, followed by intellectual or learning disabilities, and visual impairments; 16 percent of these students indicated experiencing two or more disability types. In a separate online survey of university students with disabilities, also conducted by OUSA, the vast majority of those respondents described their disability as invisible, regardless of disability type.[16]

Figure 1: Prevalence of disability types among OUSA member students who report having disabilities.[17]
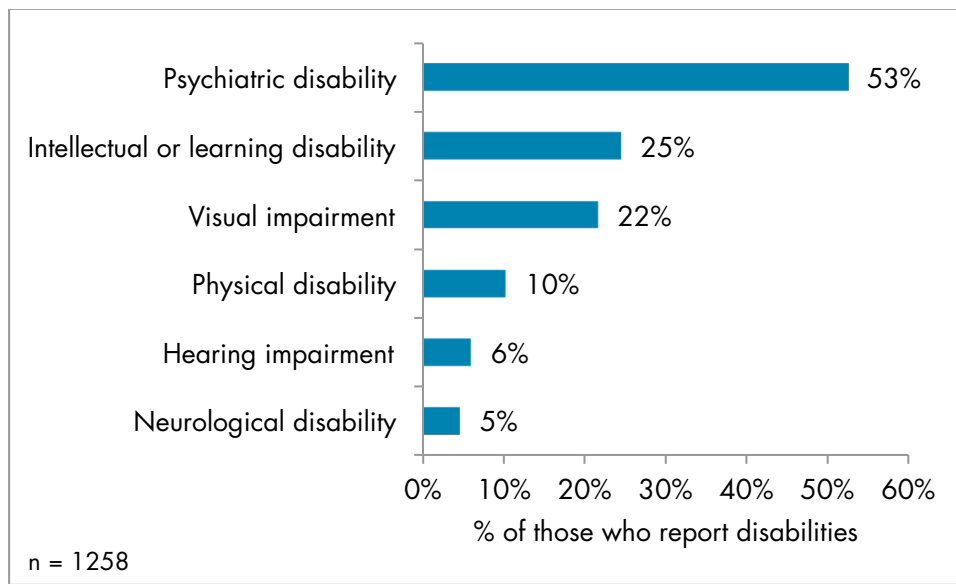
These findings differ slightly from the broader student population in Ontario; in 2013 HEQCO published a report indicating learning disabilities, psychiatric disabilities, and chronic illnesses as the three most common disabilities among university students.[18] It should be noted that chronic illness was not included as a response option on OUSA's online survey or the Ontario Postsecondary Student Survey (OPSSS).

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[15] Ministry of Community and Social Services, *Accessibility Standard for Customer Service: employer handbook* (Toronto: Queen's Printer for Ontario, 2008), 27-31. Ministry of Community and Social Services, *A Guide to the Integrated Accessibility Standards Regulation* (Toronto: Queen's Printer for Ontario, 2014), 10.
[16] Unpublished survey results from the 2015 Ontario Postsecondary Student Survey, conducted by the Ontario Undergraduate Student Alliance, administered by CCI Research Inc., November 2015.
[17] Ibid.
[18] McCloy and DeClou, *Disability in Ontario*, 14.

UNIVERSAL DESIGN FOR LEARNING

Principle: All campuses must be free from social, physical, or academic barriers that limit accessibility for students with disabilities.
Concern: Accessibility and accommodation are not always recognized as two distinct concepts.
Recommendation: The provincial government and universities should incorporate universal design for learning theories into all infrastructural, instructional, and strategic planning processes.
Recommendation: The provincial government should ensure institutions follow the Guidelines on Assessing Accommodation Requirements for Persons with Disabilities, to ensure all students are receiving equal treatment.
Recommendation: The provincial government should require all university Accessibility Offices to operate on a social model of disability.
Recommendation: Institutions must require teaching staff to create classes using the Universal Design for Learning pedagogy.

Across the province of Ontario, all publicly funded post-secondary institutions have offices that provide or coordinate services and supports for students with disabilities. However, service delivery models and standards are inconsistent, with no specific federal or provincial governmental standards.[19] Ideally, province wide policies on accommodation should account for the redistribution of resources, greater access to services and educational settings, as well as increased agency in planning, decision-making, and the right of appeal.

Provincially mandated policy must work to facilitate the need for accommodation as a means of intervention that goes beyond the individual student towards a commitment to improve the practices of accommodation through reflection, vision, collaboration, professional development and systemic change. The social model of disability is aligned with the philosophy, practices and structural conditions of inclusive education, which explain the need for the Universal Design for Learning, which looks at creating better processes for providing accommodations that would make the educational environments more accessible. This would in turn decrease the need for discrete accommodation plans, thus freeing up time and financial resources to provide individualized accommodations to students with complex needs.[20]

Furthermore, it positions student's impairment as another form of student diversity. Thus, having an inclusive educational system requires complete systemic reform and reconsideration of all educational practices to ensure equitable access for all students. This will lead to revision of educational thinking to eliminate barriers presented by the traditional formulations of students who are categorized as abled and disabled. Significantly, the social model theory passes the responsibility of educating students with disabilities from specialist teachers to all staff within the institution, thus using universal design for learning as the key theory for accessibility. [21]

To these ends, the provincial government should ensure that institutions are incorporating Universal Design for Learning theories into all infrastructural, instructional, and strategic planning processes and are following all Ontario Human Rights Commission (OHRC) guidelines

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[19] National Educational Association of Disabled Students, *Enhancing Accessibility in Post-Secondary Education Institutions: A Guide for Disability Service Providers* (Ottawa: National Educational Association for Disabled Students).
[20] Ibid, 10-11.
[21] Gable, "Disability theorising," 90-91.

on providing and assessing accommodations for persons with disabilities. The provincial government must all require all university Accessibility Offices to operate under social models of disabilities. With these assurances in place, institutions must require their faculty members to design and administer their courses using Universal Design for Learning pedagogies.

SOCIAL BARRIERS

> **Principle:** Campus accessibility must include an open and accepting community of students, faculty, and staff.
>
> **Principle:** Students should not feel like their disability is a limitation, there should be opportunities for people to find others who share similar life experiences.
>
> **Concern:** Students often avoid disclosing their disabilities due to the social stigma associated with disabilities.
>
> **Recommendation:** The province of Ontario should mandate that institutions provide comprehensive training strategies to faculty, front line staff, and student leaders to help reduce and eliminate stigma as a barrier for students with disabilities.
>
> **Recommendation:** Institutions should work to integrate stigma reduction strategies into core annual events, including welcome or orientation weeks, campus tours, and social events.
>
> **Recommendation:** Institutions must ensure students have the autonomy to choose whether or not they want to disclose their diagnosis.

Having proper access to post-secondary education is an integral component of developing income security, yet people with disabilities are less likely to attend and complete post-secondary education than those without disabilities.[22] Unfortunately, students with disabilities often face negative attitudes and stereotypes within the educational system.

Within the post-secondary sector there is often a lack of knowledge and sensitivity to disability issues on the part of some educators, staff, and other students who can make it difficult for students with disabilities to access educational services equally.[23] When students were asked to disclose their disability in the OPSSS, over 5 percent of respondents chose not to say; that decision may have come from the negative stigma that is often associated with disabilities.[24] Students may choose to conceal their disability or pass as abled, so they develop strategies to avoid seeking formal help from their home institution to ensure they are able to remain competitive and successful in their restrictive academic realm.[25] Students' desire to withhold their disabilities and diagnoses can negatively impact their educational experience as they are forced to work in an environment that does not fit their needs.

In order to combat this negative stigma within the post-secondary sector, all staff and faculty need to be cognizant of students who have disabilities. Faculty members play a vital role in supporting students with disabilities in their studies, and implementing accommodations and accessible learning. It is therefore important that they receive information and training around disability issues.[26]

In order to break down the barriers students face in the educational setting, educational campaigns should be used to bring light to disability issues. These educational campaigns should

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[22] National Educational Association of Disabled Students, *Enhancing Accessibility,* 3.

[23] Ontario Human Rights Commission, "Main barriers to education for students with disabilities (fact sheet)," Ontario Human Rights Commission, accessed March 4, 2016, http://www.ohrc.on.ca/en/main-barriers-education-students-disabilities-fact-sheet.

[24] Unpublished survey results from the 2015 Ontario Postsecondary Student Survey, conducted by the Ontario Undergraduate Student Alliance, administered by CCI Research Inc., November 2015.

[25] Cameron McKenzie, "Navigating post-secondary institutions in Ontario with a learning disability: The pursuit of accommodations," *Canadian Journal of Disability Studies* 4, no. 1 (2015): 45-46.

[26] National Educational Association of Disabled Students, *Enhancing Accessibility,* 34.

be incorporated into core events like welcome week, campus tours, and students' social events. Having an educated student population will help to reduce the negative stigma students with disabilities face around campus.[27]

As institutions integrate AODA regulations, comprehensive training to front line staff, student leaders, and faculty can be incorporated through the Integrated Accessibility Standards Regulations. This includes "mandatory accessibility standards that identifies, removes and prevents barriers for peoples with disabilities in four [areas]: Information and Communications; Employment; Transportation; and Design of Public Spaces."[28] This comprehensive training can be done through online modules.

Within the Wilfrid Laurier Students' Union, student leaders are required to participate in a two-day mental health workshop, which teaches them how to respond to students in psychological distress. Trained staff members from the Mental Health Commission of Canada provide these workshops. Similar workshops could be provided on disability issues.

Universities should create hubs for students with disabilities who desire connections with others who share their lived experiences. It is common for students with disabilities to require other support services beyond accessibility services and therefore a hub would be extremely beneficial when it comes to networking, making connections, and learning about other support services. Through this hub and community building exercise, students could gain confidence and peer-support, while reinforcing their autonomy over their diagnosis, disability, and identity.

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[27] Ibid.

[28] Accessibility Ontario, "AODA Training," AccessOntario.com, accessed March 19, 2016, http://accessontario.com/e-learning/.

TRANSITIONS

Principle: Adequate information on campus support should be available and publicized to prospective students with disabilities throughout the registration process.

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

Concern: Information on all disability services is not effectively communicated to incoming students.

Concern: Students are often unaware that they are required to take a psychosocial assessment six-months before the start of the school year, and that their university cannot accept assessments that were taken at least five years prior.

Recommendation: The Ontario Universities' Application Centre (OUAC) should list disability accommodation requirements and procedures for every Ontario campus.

Due to imperfect communication and guidance systems in the secondary education system, it is sometimes the case that students considering university education are not fully aware of the steps they must take to receive accommodation in university. Previous research has revealed that not all high-school students receive accurate information on psychosocial assessments from guidance counsellors.[29] Moreover, in their study one student noted that their high school was more than willing to provide them with a letter of accommodation, yet they were not made aware that their university would require them to take an assessment to maintain the same level of accommodations provided to them in high school.[30] The government should encourage school boards and other stakeholders to work with postsecondary institutions to ensure students are provided with information on university accessibility offices. The sooner students are made aware of assessment requirements and support services, the more prepared they will be.

Previous research has also found a significant correlation between accommodations for students with disabilities and student success.[31] Currently, many students are unaware that they are required to take a psychosocial assessment six-months before the start of the school year, and that their university cannot accept assessments that were taken at least five years prior. This leads some students to get assessments right before they begin university, only to realize that the length of time it takes them to receive the appropriate documentation will likely delay the receipt of their accommodations within the first-year of study. Furthermore, students who received assessments early in their high school career find themselves suddenly ineligible for accommodation once that assessment expires midway through their degree program.[32] Psychosocial assessments may also expire due to the fact that some learning disabilities are outgrown in late adolescence and early adulthood, but this expiration can negatively impact students when not communicated correctly.[33] Expectations must be communicated to students to ensure that they can adequately plan for a successful academic experience in university.

One mechanism would be to inform students to schedule their assessments early on in the university application process as an information piece on the Ontario Universities' Application

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[29] National Educational Association of Disabled Students, *Enhancing Accessibility*.
[30] Ibid.
[31] Ibid.
[32] Ibid.
[33] Ibid.

Centre (OUAC) website, directing students who may require accommodations to the appropriate next-steps. The website should include information regarding each institutions accessibility offices so students are aware of support services prior to applying. This will increase awareness of the benefits of early assessment among potential students by providing them sufficient information on the process of seeking accommodations.

VARIED SUMMER TRANSITION PROGRAMS

> **Principle:** Information on disability services and summer transition programs for students with disabilities should be readily available to all students accepted into an Ontario university.
> **Concern:** Not all universities host a summer transition program for incoming students with disabilities.
> **Concern:** Information about summer transition programs is not prominently featured on Accessibility Office websites.
> **Recommendation:** All universities should provide summer transition programs for incoming students with disabilities.
> **Recommendation:** The government should outsource research into the most effective types of transition programs and support services for students with disabilities to ensure consistency across institutions.

Students do not always fully utilize the campus support resources available to them, often due to lack of understanding how the services can help them succeed. For students with disabilities, this support can positively impact their academic success. It is crucial that the registration process informs students of what support services are available, as well as the role they play on campus. For prospective and incoming students with disabilities, detailed information should be presented to students upon both acceptance and admittance to ensure that they have the opportunity to make full use of the support services available to them.

A summer transition program (STP) can go a long way to helping a student cope with the added number of details and processes a disability can add to the adjustment to postsecondary life. STPs have been shown to be highly successful in improving academic success over the course of a student's university career. However, the effectiveness of the programs themselves often changes depending on the type of programming being offered by the school. Though the government funds programs at each institution, there are very few guidelines as to how extensive these programs should be.

The National Education Association of Disabled Students (NEADS) proposes some topics and practices that their members feel all STPs should incorporate. This includes the following:[34]

Topics

- Differences between high school and university/college for students with a disability and how to be successful in a PSE environment;
- Self-awareness and self-advocacy;
- Accommodations, services, and personal strategies to meet academic, social, physical, and emotional needs;
- Determining strengths and weaknesses;

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[34] National Educational Association of Disabled Students, *Enhancing Accessibility*.

- Academic and study skills including note-taking strategies, time management, organization skills, and critical reading and writing skills;
- Campus supports and library resources;
- Community and/or government based supports;
- Academic and exam accommodations;
- Documentation requirements and expectations for submission;
- Assistive technology options and applications; and
- Campus life, including social areas and events, accessible transportation, and accessible housing.

Practices

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

As this list has come directly from students who have experienced STPs, OUSA believes it should serve as a basis for a checklist of criteria for institutions hosting STPs. NEADS also takes care to note that these programs must be offered to all students with disabilities, not just students with a certain type of disability.

Advocacy groups for students with disabilities have cited that early access to information on Accessibility Offices and transition programs is a crucial component to addressing student awareness of these programs as a whole.[35] A previous study found that students who participated in STPs tended to make greater use of student services offered to students with disabilities.[36] Given that students with disabilities have a lower rate of transition to PSE and a higher dropout rate, STPs can be utilized to ensure a smooth transition and academic success for an individual's time in PSE. [37] Studies have found that STPs play an important role in students' transitions to post-secondary education. Students who did not attend STPs described a lengthier and more confusing transition process, whereas students who attended reported the benefits of seeking support and accommodations outweighed their concerns with "self-identifying as a person with disabilities". [38]

Currently, nearly every university in Ontario offers a STP, which are funded via an envelope of restricted government funding. In 2014/15, just over $1 million was provided to Ontario's 20 publicly funded universities to support STPs.[39]

While existing STPs have been successful at institutions, there are ways in which to improve them. At some schools there is comprehensive programming in place, while others limit transition programs to those with learning disabilities. Algoma, for instance, offers STPs to all

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[35] National Educational Association of Disabled Students, *Enhancing Accessibility*.
[36] Ibid.
[37] McCloy and DeClou, *Disability in Ontario*, 13.
[38] Ibid, 17.
[39] Ministry of Training, Colleges and Universities, "Operating Grants to Universities 2012 to 2013," Government of Ontario Open Ontario database, last modified August 25, 2015, accessed March 4, 2016, https://www.ontario.ca/data/operating-grants-colleges-and-universities.

students.[40] Carleton offers a stream called "Get the FACTS," aimed at students with Asperger's syndrome.[41] University of Toronto Mississauga and University of Toronto Scarborough only offer summer transition programs for students with learning disabilities.[42]

Some universities have discontinued group-oriented summer transition programming. At some universities, the joint STP has been discontinued in favour of one-on-one orientation.[43] While this is better than no orientation, one of the key benefits found from STPs is the community building aspect, which is lost during one-on-one sessions. One-on-one sessions are preferred when combined with a group portion to encourage community building.

Many other universities, including Queen's and McMaster, offer STPs that are group oriented and that take the time to acquaint all students with all campus supports and resources before the semester begins. These programs typically take place during the summer months, roughly a few weeks or a month before the fall semester.

While each institution's OSD has a web presence, they are not being used to easily promote and highlight STPs. Even where information is found within a few clicks, the onus is on students to find out about the program in order to register and participate. Research has shown a clear benefit to attending these programs for students who will seek accommodations and use support services during their school career therefore information on STPs should be immediately available to all prospective students.

The ministry should be conducting research into the most effective transition programs to ensure some level of consistency across the sector when it comes to hosting transition workshops and sessions. All universities should offer transition programs, but should not have to pay solely for them. Whether that means group and individual transition programs or one over the other, the government should further outline funding purposes and ensure there is enough to cover the transition costs. They should not however recommend a one-size-fits-all model because every institution is different in the programs and supports they offer students and how they go about processing requests and delivering certain services and programs.

[40] Algoma University, "S.T.A.R Summer Transition Program Brochure," Algoma University, access March 6, 2016, https://www.algomau.ca/media/style_assets/pdf/STAR_summer_transition_brochure.pdf.
[41] Paul Menton Centre, "Orientation for Students with Autism Spectrum Disorder (Get the FACTS)," Carleton University, accessed March 4, 2016, http://carleton.ca/pmc/transition-to-carleton/get-the-facts/.
[42] Deborah Tsagris and Bill Muirhead, *Evaluating post-secondary supports for Ontario students with learning disabilities* (Toronto: Higher Education Quality Council of Ontario, 2012).
[43] Tsagris and Muirhead, *Evaluating post-secondary supports*.

SUPPORT SERVICES

> **Principle:** Disabilities take on various forms and therefore each student's support should be tailored to their specific disability.
> **Principle:** Support services must be available for students with all types of disabilities.
> **Concern:** While support services exist on all OUSA campuses, they are not always accessible to students due to stigma, costs, and disclosure requirements.
> **Concern:** Faculty and staff are not always provided adequate training to help students navigate the support services at their university.
> **Recommendation:** Universities should receive enveloped funding, for their Accessibility Offices, to ensure the proper training of faculty and staff on disability accommodations and support services.
> **Recommendation:** The Ontario government should fund a central intake officer or case manager at every postsecondary institution.

Disabilities range from the highly visible to the highly invisible, and it is imperative that support services both acknowledge this and operate under this understanding.[44] Support services cannot operate under one-size fits all models. Students with disabilities that are not physically recognizable, benefit immensely from specialized accommodation and support.

"Students with disabilities have become an increasingly underrepresented social group and as such, have become an at-risk group for policy makers and educators."[45] Both institutional and personal barriers exist for students attempting to gain access to student services.[46] It is well understood that disabilities can negatively impact student success if left unaddressed. Success therefore not only impacts the individual lives of these students, but also Ontario post-secondary as a whole.

According to the Martin Prosperity Institute, 22 percent of persons with disabilities in Ontario say that they discontinued their studies at some point as a result of their disability, a rate that varies depending on the state of the disability.[47] Through the provisions of the AODA, Ontario has made a commitment to be barrier-free by 2025, making such a significant rate of educational stoppage troubling. Students share the commitment of the provincial government and believe that further attention must be paid to the crucial issue of student support.

While Accessibility Offices experience increasing pressure due to the influx of students coming forward with mental health conditions, students report that they need more "effective crisis support and better access to professional services (counsellors, psychologists, psychiatrists)."[48] As a result of these pressures, support services on Ontario campuses have been limited and strained. OUSA is in agreement with research by Dr. Michael Condra and Eleanor Condra recommending that the Ministry of Training, Colleges and Universities fund a central intake or case manager role

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[44] Devlin and Pothier, "Introduction: Toward a Critical Theory of Dis-Citizenship," 15.
[45] David Zarifa, David Walters, and Brad Seward, "The Earnings and Employment Outcomes of the 2005 Cohort of Canadian Postsecondary Graduates with Disabilities," *Canadian Review of Sociology* 52, no. 4 (2015): 344.
[46] Tsagris and Muirhead, *Evaluating post-secondary supports,* 17.
[47] Alison Kemper, Kevin Stolarick, James Milway, and Jutta Treviranus, *Releasing Constraints: Projecting the Economic Impacts of Increased Accessibility in Ontario* (Toronto: Martin Prosperity Institute, 2010).
[48] Michael Condra and Eleanor Condra, *Recommendations for Documentation Standards and Guidelines for Academic Accommodations for Post-Secondary Students in Ontario with Mental Health Disabilities* (Kingston: Queen's University, 2015), 15.

on every academic campus.[49] This case manager would be the original point of contact for many students seeking support services and they would have a wide range of knowledge of all student support services on campus, outside of the Accessibility Office. More information regarding the recommended role of case manager can be found in the report *Recommendations for Documentation Standards and Guidelines for Academic Accommodations for Post-Secondary Students in Ontario* (2015).

The main point of contact for a student is a faculty or staff member. Therefore, they must be provided with the appropriate training to ensure they are aware of support services on campus should a student reach out to them for guidance. While it is not expected that faculty and staff be trained experts on support services or accommodation guidelines, a level of broad understanding should be expected. Training should be mandatory for all faculty and staff and regular updates regarding the purpose of campus support services should be sent out. Universities should look for guidance from Western University's "No Wrong Door" policy, where it is their mission to train all university faculty and staff on what resources are available for students.[50]

The case manager could work with the summer transition coordinators to plan activities throughout the year to assist students with their integration, and navigation through post-secondary education.[51] In addition to working with the summer transition coordinators, the case manager could be responsible for training all faculty and staff on disability support services for each respective campus. If faculty members were more knowledgeable about services and supports available for students with disabilities, it would hopefully reduce student's trepidation when it comes to asking professors and staff for support and/or accommodations.[52] In addition, faculty and staff who are trained on accessibility services may be more likely to include accessible teaching methods and practices in their classrooms, moving towards a universal design of learning.

LIMITED FUNDING FOR ACCESSIBILITY OFFICES

> **Principle:** Accessibility Offices should be able to access the resources necessary to provide adequate support to all students in need in a timely and efficient manner.
> **Concern:** Accessibility Offices often grapple with insufficient resources and increasing demands for support.
> **Recommendation:** The government should participate in consultation every two years with Accessibility Offices to ensure current funding needs are being met.
> **Recommendation:** The government should provide enveloped funding for program development within Accessibility Offices, if funding is determined insufficient through the consultation process.

Due to the positive reduction of stigmas associated with mental illness, Accessibility Centres and accessibility services offices are strained with regard to staff and funds. While this reduction in stigma shows a step in the right direction, current support services are finding it difficult to respond to students with varying types of disabilities. While OUSA understands that a system where scant resources are available might opt to direct programming and resources to where the

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[49] Condra and Condra, *Recommendations for Documentation Standards,* 15.
[50] Western University, "Student Experience: Wellness Education Centre," Western University, accessed March 30, 2016, http://se.uwo.ca/wec.html.
[51] Condra and Condra, *Recommendations for Documentation Standards*, 29.
[52] Tsagris and Muirhead, *Evaluating post-secondary supports,* 17.

highest need exists, this model of support is unacceptable. This should be seen as a present reality to overcome, not a steady state for the post-secondary system. The Ontario government should review the funding platform for Accessibility Offices and utilize research outlets to determine need per campus.

Although per-student funding for Accessibility Offices exists, it may not necessarily be sufficient; raw numbers do not necessarily capture the reality of complex cases and variable costs. In order to ensure funding needs are met, the government should conduct consultations with Accessibility Offices every two years. Moreover, as accessibility is a human right and critical service, students' ancillary fees should not be relied upon for this purpose.

As university enrolment has increased over the past decade, support for campus accessibility services has grown to accommodate increased need. However, this growth has not necessarily grown in proportion to need. Since 1990, the percentage of students utilizing Accessibility Offices has grown three times, from 1.2 to 3.8 percent of total enrolments.[53] The average advisor in an Accessibility Office now manages hundreds of students with disabilities.[54] With service use almost quadrupling, funding has grown from $12 million to $41.4 million.[55] While this funding increase has been helpful in improving service, accessible campuses will require an increased commitment from the provincial government and institutions to ensure that the service provision and accommodation does not suffer due to overcrowding in the system.

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[53] Condra and Condra, *Recommendations for Documentation Standards.*
[54] Interviews with Office for Students with Disabilities staff, 2012 and 2015.
[55] Kemper, Stolarick, Milway, and Treviranus, *Releasing Constraints.*

ACADEMIC ACCOMMODATION

> **Principle:** All students should be accommodated for their disability, in accordance with the Ontario Human Rights Commission policies, up to the point of undue hardship for the institution and without the need to disclose their diagnoses.
> **Principle:** Any documentation in which accommodations are based off of should not include specific diagnoses in any institution and should only focus on functional limitations.
> **Principle:** Accommodations for students with disabilities should be a priority for all involved in the university, however should be organized by Accessibility Offices.

To combat the barriers students with disabilities face, the Ontario Human Rights Commission created and set out guidelines on accessible education that must provide the following:

> "An appropriate accommodation at the post-secondary level would enable a student to successfully meet the essential requirements of the program, with no alteration in standards or outcomes, although the manner in which the student demonstrates mastery, knowledge and skills may be altered. In this way, education providers are able to provide all students with equal opportunities to enjoy the same level of benefits and privileges and meet the requirements for acquiring an education without the risk of compromising academic integrity."[56]

The OHRC disability policy affirms the right of persons with disabilities to have full participation and integration within their educational process. An accessible educational system means persons with disabilities can "access their environment and face the same duties and responsibilities as everyone else, with dignity and without impediment."[57] In the context of post-secondary education, accessibility goes beyond making the campus physically accessible to include "accessible curricula, and delivery and evaluation methodology, as well as the provision of the necessary supports and accommodations to ensure that students with disabilities have equal opportunity in their education."[58]

By law, institutions are required to accommodate their students with disabilities up to the point of undue hardship for their operations. There are only three valid considerations for assessing whether an accommodation would cause undue hardship: cost; outside sources of funding, if any; and health and safety requirements, if any. Only if accommodation would alter the essential nature of operations, would substantially affect viability of operations or services, or violates existing health and safety legislation could an institution claim undue hardship.

Although much work has been and is being done to include appropriate adaptations of educational curricula for a range of students, with a range of capacities and abilities, creating inclusive learning environments remains one of the largest areas of difficulty for education providers and their students. It creates a large number of barriers because of the individual nature of students and their requirements. There are areas where not enough has been done to improve inclusivity, namely maintaining the essential requirements of the curriculum using dignified adaptations that maintain users' independence is not well understood. There are three main areas where improvements could be made to improve the university experience of students with disabilities; these are as follows.

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[56] Ontario Human Rights Commission, "Main barriers to education."
[57] Ontario Human Rights Commission, *Policy and guidelines*.
[58] Ibid.

INCONSISTENT DOCUMENTATION

> **Principle:** Documentation requirements should be consistent for all postsecondary students seeking academic accommodations.
>
> **Concern:** Province-wide documentation standards do not exist in the area of mental health.
>
> **Concern:** Students are often forced to provide a diagnosis, verified by a doctor, in order to receive accommodation.
>
> **Concern:** Institutions' policies on accommodation vary from one institution to another, not allowing for a transparent approach for students with disabilities.
>
> **Concern:** Students are often required to submit disability documentation every semester, which can be time consuming and debilitating.
>
> **Recommendation:** Institutions must provide accommodations based on functional limitations, and not based upon specific diagnoses.
>
> **Recommendation:** The provincial government should mandate province-wide documentation standards and guidelines to ensure students with disabilities have adequate access to accommodations.
>
> **Recommendation:** Institutions should not require students with permanent, registered disabilities to seek additional documentation, sometimes in the form of a doctors' note, in times when their disability impedes their ability to succeed in the classroom.
>
> **Recommendation:** The provincial government should extend OHIP coverage to include doctors' notes for students with disabilities when they require accommodation relating to their disability.
>
> **Recommendation:** Institutions should negotiate with UHIP to extend coverage to include doctors' notes for students with disabilities when they require accommodations related to their disabilities.
>
> **Recommendation:** The provincial government should mandate that students with permanent disabilities only have to provide documentation of their disability once upon arriving to the institution, unless their needs or accommodations have changed.
>
> **Recommendation:** Students should not be required to hand their accommodation documentation directly to a professor, and should have the option to have it submitted through the appropriate office in the institution.

Each institution is responsible for ensuring every student who requests accommodation receives it, but in order for a student to request accommodation, proof of disability and associated functional limitations needs to be presented. A major barrier for students is that province-wide documentation standards do not exist, particularly in the area of mental health.[59] In a review of documentation requirements across the province, researchers found very little consistency in the information being requested from health care practitioners.[60] Institutions typically employ institution-specific forms, which must be completed by regulated health care professionals on behalf of students seeking academic and access accommodations.[61] These forms include a range of assessments of functional limitations, in non-standard language and have differing requirements for a proper foundation of diagnostic information.[62]

In some cases students find themselves disclosing to instructors, which can put them in an uncomfortable situation. On OUSA's online survey, respondents rated the accessibility of their

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[59] Condra and Condra, *Recommendations for Documentation Standards*, 1.

[60] Ibid, 6.

[61] Ibid, 8.

[62] Ibid.

courses lower than the accessibility of their campuses.[63] More telling was students' responses to questions asking them about their level of comfort discussing disability with their Accessibility Offices and professors. While 42 percent of respondents were either somewhat uncomfortable or very uncomfortable notifying their accessibility or disability related office, 74 percent of respondents were somewhat uncomfortable or very uncomfortable talking to their professors.[64]

Students with psychiatric disabilities sometimes face additional barriers getting accommodated. Students with developing mental health conditions may seek support from the services available at their institution, however many students have found it could take weeks to get an appointment with a health care professional and longer for a conclusive diagnosis to be reached. A number of circumstances may lead to this type of situation. For example, difficulties with timely access to mental health services may hinder students' receipt of the assessments required to diagnose a mental illness.[65] Many students who refer themselves to campus counselling services show signs of significant disruption to their academic functioning due to mental health problems that they have attempted to "cope" with themselves, which often puts a greater personal and academic cost on them, before seeking professional care.[66] Furthermore, the stigma around "mental health disabilities" remains a major factor that has prevented students from disclosing information about the problems they experience with their mental health.

In general, academic and access accommodations are designed to address students' identified functional limitations.[67] The assessment of these limitations in the area of undiagnosed disabilities can be a significant challenge, since assessments are mainly based upon self-report and reflection to verify the presence of a mental health disability and to provide a rationale for determining accommodations; at many institutions, it is necessary to provide both a diagnostic statement and an assessment of functional limitations.

There is a need to move away from using a diagnosis as a concrete basis for accommodations when functional impairments or limitations are evident even when the diagnosis is not clear.[68] The province must work with post-secondary institutions to focus on the assessment of a discrete set of functional limitations linked to underlying disabilities, rather than forcing students to reveal and be accommodated based on a discrete diagnosis. The province of Ontario must work with regulated health care providers to present information about functional limitations. This will provide clear information to Accessibility Office staff members who can in turn better match accommodations to functional limitations that are specific to the academic environment.[69] In this way students can be accommodated without judgement and should only be required to resubmit their documentation when their limitations change.

In the spirit of accommodating students with disabilities in a dignified manner, processes for obtaining and submitting documentation must be streamlined. Namely, students should not be required to pay for doctors' notes when they require last minute accommodations related directly to their disability. Since it is unrealistic to expect doctors not to charge for *any* notes, we ask that the provincial government extend Ontario Health Insurance Plan (OHIP) coverage to include doctors' notes for students with disabilities and that institutions work with University Health

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[63] Unpublished survey results from the OUSA Experiences of Students with Disabilities online survey, conducted by the Ontario Undergraduate Student Alliance, November 2015.
[64] Ibid.
[65] Condra and Condra, *Recommendations for Documentation Standards*, 8.
[66] Ibid.
[67] Ibid, 6.
[68] Ibid.
[69] Ibid.

Insurance Plan (UHIP) providers to similarly extend coverage for international students with disabilities. Once documentation is obtained, students should only be required to submit proof of permanent disability once during their university career (in the case that their accommodation, needs, or limitations remain static) and any documentation required by instructors should be sent through Accessibility Offices by default. The provincial government should set mandates in this regard and ensure institutions adhere to these mandates.

CUMBERSOME PROCESSES

Principle: Academic accommodations must be consistent, reliable, and easily accessible.
Principle: Students must feel safe when seeking accommodation.
Principle: Students with disabilities must be aware of institutional assistance available to meet different accessibility needs.
Principle: Students with disabilities should be made more aware of the institutional assistance available to them through wide promotion of this assistance inside and outside of the classroom.
Concern: Students who have disabilities potentially face academic strains.
Concern: Students often do not receive the proper information regarding the different forms of academic accommodations available to them.
Concern: Students experience difficulties accessing the academic accommodations they need to meet their full potential.
Concern: Full accommodations can take a long time to come into effect and therefore students are left without accommodations while trying to complete assignments, tests, and exams in the classroom. This can severely impede their ability to succeed.
Recommendation: Institutions must provide more information within the classroom on where students can access varied and flexible academic accommodations.
Recommendation: Accommodations should be delivered in a timely manner, reflective of academic dates and course schedules.
Recommendation: Institutions should make interim accommodations available for students with disabilities while they are waiting for their full accommodations.

Students receiving a post-secondary education in Ontario often have to renew accommodations each year with their Accessibility Office and/or seek out further documentation. By not having a streamlined process for students to access their accommodation each year of their studies, students with disabilities risk missing out on the support they need to successfully complete their studies. While the Canadian Charter of Rights and Freedoms requires post-secondary institutions to adhere to provincial statutes regarding accessibility on campuses, no specific standards exist. [70] What this means, is that procedures surrounding access to accommodations vary at each academic institution. [71]

Without streamlined processes students, faculty, and staff are often confused about where to turn when faced with questions regarding accommodations. This is particularly problematic because the Ministry's Accessibility Fund for Students with Disabilities (AFSD) bases a portion of its funding formula off of the number of students registered with Accessibility Offices. With the many stigmas associated with self-identifying with a disability and a lack of clear information surrounding access to accommodation, funding is not being accurately distributed.

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[70] Cathy Gulli, "How universities are helping students with 'invisible' disabilities," Maclean's, February 9, 2016, http://www.macleans.ca/society/health/how-universities-are-helping-students-with-invisible-disabilities/.
[71] Ibid.

Accommodation is not always provided in a timely manner, it is frequently insufficient, and sometimes not provided at all.[72] Institutions have to ensure they are providing all students with the proper knowledge of where to find assistance, in all levels of studies and within each classroom to ensure students receive the proper accommodations where and when they see fit.

In cases where accommodations are expected to be late for students, or are spontaneously unable to be timely, institutions should provide interim accommodations. According to the OHRC, delays in providing accommodation have the potential to directly impede a students' ability to access and participate in the educational curriculum.[73] Additionally, as noted by the OHRC, "unreasonable delays may be found to violate the procedural duty to accommodate, and thus constitute a breach of the Code".[74] While students have a responsibility to give ample time to administrators, there is an expectation that an interim solution will be found while students are waiting for their full accommodation to take effect. An example of this would be a personal reader being provided to a student who has low vision while they are waiting for an electronic transcription of course materials.

All students should have the earliest possible access to their academic accommodations. Without them, their academic performance is jeopardized. A quote from a 3rd year student explains: "I've accepted that I don't know whether I'm ever going to be able to learn to my full capacity here."[75] No student should ever have to accept this as fact.

In order to fully assist students, both institutional faculty and staff need to be aware of where students can seek additional assistance to ensure students are properly informed and in a timely manner.[76] Ensuring accommodation availability is identified within syllabi will allow students to have access to the OSD early. Having professors explain where to find resources at the beginning of each semester will also help raise awareness among the student population of where and how to find accommodations. However, for students who know what accommodations they need, it is crucial they are granted the ability to arrange their accommodations prior to the start of each semester.

INSUFFICIENT FACULTY TRAINING

Principle: The post-secondary sector needs to be adequately supplied with proper training measures for staff and faculty to be properly able to address a student who is in need of accommodation with the classroom.
Concern: Professors and teaching assistants are often not trained in how to properly accommodate a student with a disability.
Concern: Professors and teaching assistants are often not informed of the need to incorporate inclusive learning into their teaching.
Recommendation: Institutions must ensure faculty and teaching assistants incorporate inclusive learning into their curriculum that aligns with the Universal Design for Learning.
Recommendation: Accessibility Offices should be responsible for working with instructors and staff to implement students' academic accommodations.

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[72] Gulli, "How universities are helping students with 'invisible' disabilities."
[73] Ontario Human Rights Commission, "Accommodation process," Ontario Human Rights Commission, accessed April 6, 2016, http://www.ohrc.on.ca/en/guidelines-accessible-education/accommodation-process.
[74] Ibid.
[75] Interview with a third-year student at an OUSA member institution, October 2015.
[76] Ibid.

At the University of Toronto, the Accessibility Office provides students with a Letter of Accommodation that is presented to their faculty member. This letter verifies that the Accessibility Office has received and reviewed proper documentation of an identified disability and has provided details on the proposed accommodation. If a faculty member has a concern regarding the proposed accommodation, they are able to contact the student's accessibility advisor who is listed on the Letter of Academic Accommodation.[77] Advisors create plans that they believe will best suit each of their student's needs. Professors are allowed to voice their concerns regarding the proposed accommodation plan, but they are not fully trained in how to meet the accommodation needs, which creates a gap in education for students who require academic accommodations and those who do not.[78] OUSA acknowledges it is beneficial to include faculty into the accommodation plan, but they first need adequate training on how to create an inclusive learning environment for students who have disabilities. If faculty were adequately trained, they would make valuable members of any accommodation team and be equipped to proactively make their classrooms and teaching methods broadly accessible and inclusive.

Staff and faculty who are responsible for accommodation should be aware of the standards for accommodation. When creating accommodation plans, the following must be considered:

- The needs of persons with disabilities must be accommodated in the manner that most respects their dignity, to the point of undue hardship;
- There is no set formula for accommodation – each person has unique needs and it is important to consult with the individual involved;
- Taking responsibility and showing willingness to explore solutions is a key part of treating people respectfully and with dignity; and
- Voluntary compliance may avoid complaints under the Human Rights Code, as well as save the time and expense needed to defend against them.[79]

Including instructors in the accommodation process could also help to increase their confidence in academic accommodations in general, while also ensuring students' accommodations meet the essential requirements of their course. Accommodating students with complex needs requires the input of professionals with different areas of expertise.[80] Accommodations teams should "involve collaboration between content experts (members of faculty) and accommodation experts (staff in the OSD)."[81] This type of collaboration ensures that students receive the best possible accommodations without involving them directly in the negotiation process.

[77] Office of the Vice-Provost, Students & First-Entry Divisions, "Academic Accommodation," University of Toronto, accessed February 10, 2016,
http://www.viceprovoststudents.utoronto.ca/publicationsandpolicies/guidelines/academicaccommodation.htm.
[78] Ibid.
[79] Ontario Human Rights Commission, *Policy and guidelines.*
[80] Condra and Condra, *Recommendations for Documentation Standards.*
[81] Ibid, 23.

FINANCIAL BARRIERS

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

Ontario Bursary for Students with Disabilities (BSWD): The BSWD is for students with permanent or temporary disabilities who are studying full- or part-time at a post-secondary institution and have financial need.[82] Students who qualify for the Ontario Student Assistance Program (OSAP) or the Canada Student Grant for Part-time Students (CSG-PS) can receive this bursary. Up to $2,000 is available to assist with the costs of disability-related services or equipment, such as tutors, note-takers, interpreters, braillers, or technical aids.[83] Students are required to submit an estimate of the services or equipment they are approved for and require ahead of time, and then provide receipts after they are approved for reimbursement.

Canada Student Grant for Services and Equipment for Persons with Disabilities (CSG-PDSE): The CSG-PDSE is available to students with a permanent disability to help cover some of the educational costs related to their disability. Students apply to this grant in tandem with the BSWD, and it functions in much the same way.[84] Like the BSWD, this grant is available to full- and part-time students who qualify for financial assistance. However, unlike the BSWD, this grant will cover educational costs of up to $8,000 per year and is only available to students with permanent disabilities.[85]

Canada Student Grant for Students with Permanent Disabilities (CSG-PDA): The CSG-PDA is available to students with a permanent disability who are studying full- or part-time at a post-secondary institution and who demonstrates financial need.[86] Students seeking to apply for this grant must: 1) qualify for the Canada Student Loan Program; and 2) have a permanent disability that has been defined in the Canada Student Financial Assistance Regulations (in accordance with the Canada Financial Assistance Act, 1994).[87] The grant provides help to pay for education-related costs such as tuition, books, mandatory fees, living costs and transportation. Up to $2,000 per academic year is available and unlike the BSWD and CSG-PDSE, students receive the money upfront rather than being reimbursed after purchases have been made.[88]

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[82] OSAP, "Bursary for Students with Disabilities (BSWD)," Ontario Ministry of Training, Colleges and Universities, last modified May 13, 2014, accessed February 12, 2016, https://osap.gov.on.ca/OSAPPortal/en/A-ZListofAid/PRDR008120.html.
[83] Ibid.
[84] OSAP, "Canada Student Grant for Services and Equipment for Persons with Permanent Disabilities (CSG-PDSE)," Ontario Ministry of Training, Colleges and Universities, last modified May 13, 2014, accessed February 12, 2016, https://osap.gov.on.ca/OSAPPortal/en/A-ZListofAid/PRDR008134.html.
[85] Ibid.
[86] OSAP, "Canada Student Grant for Persons with Permanent Disabilities," Ontario Ministry of Training, Colleges and Universities, last modified May 13, 2014, accessed February 12, 2016, https://osap.gov.on.ca/OSAPPortal/en/A-ZListofAid/PRDR008122.html.
[87] Ibid.
[88] Ibid.

Principle: Students with disabilities must be provided with adequate financial assistance to cover the costs associated with their disability.

Principle: Students with temporary disabilities should also have access to disability-related financial assistance.

Concern: Access to some government grant programs is restricted to students with a registered, permanent disability, limiting access to students who may suffer from a temporary disability.

Concern: Students with disabilities may be restricted from admission scholarships due to full time status requirements.

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

Recommendation: Institutions should offer admissions scholarships to all students with registered disabilities, not just full-time students.

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.

Typically when a student enters post-secondary, the price tag—inclusive of education and living costs—is quite high. For a student with a disability, this price tag can be even higher when additional costs of medication, assistive devices, and healthcare are included. Some students with disabilities do not take full-time semesters, and therefore their education is spread out over more years than a student who does not have a disability. In OUSA's Ontario Postsecondary Student Survey conducted earlier this school year, 47 percent of respondents who identified as having a disability said they were very concerned about having enough money to complete their education; this number is compared to 36 percent of students who do not identify with having a disability and were very concerned about the same problem.[89] Additionally, when students rated what needed the most improvement at their university, 50 percent of respondents who identified with having a disability rated financial assistance the highest.[90] For students without disabilities, the highest rated was tuition and ancillary fees.[91] While it is known that students on average contribute to 51 percent of university's operating budgets, the cost to attend a post-secondary institution along with living is typically much higher for students with disabilities than what able-students have to pay.

In addition, students who have temporary disabilities are, for the most part, excluded from accessing increased financial aid. For a student with a broken leg or multiple concussions, there comes a higher price associated with travel, which is not recognized by the provincial or federal governments in their bursary assessments. Currently, students with temporary disabilities are only able to access the BSWD. However, when a student experiences a temporary disability, it can increase costs of living. For example, a student who has a broken leg will need alternate transportation, such as a taxi, in order to attend classes. This is an expense that is typically not budgeted for, and students must pay out of pocket. The provincial government should lobby the

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[89] Unpublished survey results from the 2015 Ontario Postsecondary Student Survey, conducted by the Ontario Undergraduate Student Alliance, administered by CCI Research Inc., November 2015.
[90] Ibid.
[91] Ibid.

federal government to include students with temporary disabilities in their assessment of students who have need.

Students with disabilities who must take a reduced course load are automatically excluded from some scholarships. For example, Wilfrid Laurier University awards entrance scholarships on the best six courses in high school prior to entry to university and it is renewable for the next three years (four for some programs). The scholarship however is automatically renewable based on an annual GPA threshold over a minimum of five full credits during the past academic year.[92] This credit requirement assumes that the student is pursuing their academics full-time during the eight-month academic year. This example is quite exclusionary to students with disabilities who are still able to succeed academically, but require a reduced course-load. Institutions should change their requirements so that students with disabilities are exempt from the full-time status requirement.

Finally, students with psychological, mental, or learning disabilities are required to be registered with formal documentation prior to accessing transition programs or accommodations with on-campus accessibility centres. While in high school, students are able to access accommodations without an assessment, and even so, the assessments are covered under OHIP. These assessments however must be done every three to five years because assessment data are not considered stable due to the continued development of the person.[93] After age 18, the assessments are considered valid for life, and are not covered by OHIP.[94] At the University of Guelph in their Assessment Service department, an assessment conducted by a registered psychologist costs between $2,400 and $2,800.[95] Some private insurance companies do provide coverage, however the typical "student plan" provided by Student VIP only covers a maximum of $800 at 80% coverage.[96]

Government funding is available to cover a certain amount of the assessment costs, but the amount is insufficient. The BSWD will reimburse a student up to a maximum of $1,200 for a diagnostic assessment.[97] Considering these two sources of funding (the private insurance plan and the BSWD), a student can only be covered for a maximum of $2,000. The provincial government should lobby the federal government to include psychological assessments in their funding allotment schedule due to the increased and extreme costs associated with this diagnostic tool.

RELIANCE ON PRIVATE LENDERS

Principle: Students with disabilities should have access to adequate financial resources, even without aid from private lenders.
Concern: The proportion of students living with a disability who borrow from private lenders is higher than students without disabilities
Concern: OSAP is not available for part-time students, thereby excluding students who live with a disability and have to take a decreased course-load.

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[92] Wilfrid Laurier University, "Entrance Scholarships and Awards (undergraduate)." Wilfrid Laurier University, accessed February 13, 2016, https://www.wlu.ca/studentawards/entrance-scholarships-awards.html.
[93] Tsagris and Muirhead, *Evaluating post-secondary supports,*
[94] Ibid.
[95] Centre for Psychological Services, "Assessment Services," University of Guelph, accessed February 13, 2016, https://www.uoguelph.ca/cps/our-services/assessment-services.
[96] Ibid.
[97] OSAP, "Bursary for Students with Disabilities."

> **Recommendation:** Automatically exempt students with severe permanent disabilities from the OSAP expectation of a minimum pre-study period contribution.
> **Recommendation:** Every institution must extend full scholarship eligibility to students with disabilities who are taking a reduced course load.
> **Recommendation:** OSAP should be available for part-time students with disabilities, as they are sometimes required to take reduced course loads as a result of their disability.

According to OUSA's Ontario Post-Secondary Student Survey, 2015, the percentage of students who took out bank loans who identify with having a disability is 12 percent, compared to 10 percent of students who do not have a disability.[98] Comparably, 13 percent of students with disabilities said they relied on their family's loan or line of credit, while only 10 percent of students without disabilities said the same.[99] This is concerning as students with disabilities should be able to access an equitable amount of financial assistance as an able student without the need for private sources. The unfortunate reality is that many students with disabilities typically have larger expenses than students without and are not compensated comparably for those increased costs.

In addition, although the threshold for "full-time" status is typically recognized as lower for a student with a registered disability, many students with disabilities opt to take lower course loads, making them part-time students. OSAP is very limited for part-time students and therefore they mostly rely on federal grants, if they qualify.

OUSA's recommendation is three-fold. Primarily the Ontario government should expand OSAP to part-time students to help out students across the sector, including those with disabilities. Second, OSAP expects students to contribute a fixed pre-study income to their studies. The fixed contribution is $1,500 per term, to a maximum of $3,000 per academic year.[100] OSAP defines a severe permanent disability as being an impairment that restricts an individual from performing the daily activities necessary to participate in studies at a postsecondary school level and in the labour force; and the disability is expected to remain with the person for the duration of their life.[101] If the student is collecting funding from the Ontario Disability Support Program (ODSP) than their contribution is already reduced to zero.[102] For those students that fit into this classification, cannot work, but are not on ODSP, fixed contribution requirements should be excluded from consideration in calculating their financial need automatically. Currently students need to appeal this calculation, which leaves this on the student to prove that he or she is unable to contribute during the summer. This student may not even be aware of this appeals process, and this exemption would reduce the number of appeals processed by OSAP and university staff.

Finally, many institutions require students to be full-time students to be eligible for a number of scholarships and bursaries. For example, McMaster University requires students to be in full-time studies for their entrance scholarship to renew year to year.[103] There is no mention on the website about students with disabilities who choose to pursue studies at a reduced course load.

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[98] Unpublished survey results from the 2015 Ontario Postsecondary Student Survey, conducted by the Ontario Undergraduate Student Alliance, administered by CCI Research Inc., November 2015.
[99] Ibid.
[100] Student Financial Assistance Branch, *2015-2016 Eligibility, Assessment and Review Manual Part I: Eligibility and Assessment* (Toronto: Ontario Ministry of Training, Colleges and Universities, 2015).
[101] Government of Ontario, "OSAP definitions," Government of Ontario, accessed February 13, 2016, https://www.ontario.ca/page/osap-definitions#section-28.
[102] Student Financial Assistance Branch, *2015-2016 Eligibility, Assessment and Review Manual.*
[103] Student Financial Aid & Scholarships, "McMaster Scholarship Programs," McMaster University, accessed March 4, 2016, http://sfas.mcmaster.ca/scholarshipinfo.html.

Additionally, in-course scholarships require students to be taking a full course-load and grade point averages will be based on fall and winter full-time status.[104] The full-time studies awards are much more significant compared to the part-time studies awards.

Although this is just one example, it is quite representative of the system. Students with disabilities are systematically excluded from consideration of scholarships and bursaries due to the fact that they choose to take reduced course loads, through no fault of their own. Universities should consider extending full-time course load prerequisite scholarships and bursaries to students with disabilities with a reduced threshold.

LOW AWARENESS OF FINANCIAL ASSISTANCE OPTIONS

Principle: All students should have access to information about the financial assistance available to them in post-secondary education.
Concern: Many students with disabilities are not aware of the specific financial assistance available to them, specifically, the Ontario bursary for students with disabilities.
Recommendation: The provincial government should partner with accessibility centres to increase awareness and provide education and information about the financial aid available for students with disabilities.
Recommendation: The provincial government should encourage Accessibility Offices to incorporate financial literacy specific to students with disabilities into their core functions and job descriptions.

As it is for many students, the financial aid system can be difficult for students with disabilities to navigate. The bursary application system tends to be quite complicated and the provincial government does not do a sufficient job at advertising the financial assistance options available. When OUSA asked a group of students with disabilities, "how familiar are you with financial assistance available to students with disabilities," 55% of them said either "not at all familiar" or "not that familiar."[105] Additionally, when asked, "Have you ever used the financial assistance available to students with disabilities?" 77% of students responded "no."[106] In order to increase the amount of students who access the bursaries available to students with disabilities, the provincial government should work with institutions and accessibility offices to better advertise the opportunities that exist.

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[104] Ibid.
[105] Unpublished survey results from the OUSA Experiences of Students with Disabilities online survey, conducted by the Ontario Undergraduate Student Alliance, November 2015.
[106] Ibid.

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT

On June 13, 2005, Ontario became the first province in Canada to enact legislation specific to accessibility with the Accessibility for Ontarians with Disabilities Act (AODA).[107] Within this legislation, accessibility standards that identify, remove, and prevent barriers for people with disabilities have been developed. It applies to all levels of government, non-profits, and private sector businesses across Ontario who have one or more staff members.[108] The AODA gives the government authority to set monetary penalties to enforce compliance with accessibility standards. Penalties range from warnings to fines up to $100,000 for corporations; deadlines for compliance range from January 1, 2010 to dates in 2021.[109]

The act is made up of five parts that cover daily aspects of life and is purposed to advocate for those who not only have identifiable disabilities that are visible and apparent, but also the broad range of non-visible disabilities. The five standards are: customer service; information and communication; the built environment; employment; and transportation. Rights of those with disabilities have been protected under the Ontario Human Rights Code since 1962, and while both use the same definition of "disability," the AODA provides specific standards for government, non-profits, and businesses to follow.[110]

INACCESSIBLY BUILT ENVIRONMENTS

Principle: All universities must be moving towards and be compliant with the AODA by 2025. This includes all timelines referenced in the Public Sector: 50+ employees standard of the act.
Principle: All accessibility initiatives taken on by universities should support the AODA's four principles: dignity, independence, integration, and equal opportunity.
Principle: All universities must file an accessibility report annually that shall be made available to the public.
Concern: Due to the nature of older campuses, Universities tend to be out of compliance with Ontario building code or accessible public sector building standards.
Recommendation: The Ontario government should require that all areas on campus be accessible and not just reserve the building standard to newly constructed buildings or redevelopments. In preparation for adhering to this recommendation, priority should be given to high traffic areas of campus.
Recommendation: The provincial government should enter into agreements with institutions in order to provide incentives for exceeding compliance with AODA accessibility standards.
Recommendation: The provincial government should make funds available to universities to make their existing buildings compliant with AODA building standards.

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[107] Council of Ontario Universities, "Module 1 – Understanding the AODA and the Accessibility Standards for Customer Service," Carleton University, accessed February 13, 2016, http://carleton.ca/equity/aoda-modules/accessible/module-1/18.html.
[108] Ibid.
[109] Ibid.
[110] Council of Ontario Universities, "Module 1 – Understanding the AODA and the Accessibility Standards for Customer Service."

In the *Second Legislative Review of the AODA*, published in November 2014, there were a number of issues that were brought forward concerning the built environment.[111] As the current legislation stands in the AODA, only new buildings or reconstructed buildings must be in compliance with the built environment standards. This however excludes many old buildings that most prominently exist on university campuses. As the Moran report states, "The current Built Environment Standards do not cover retrofits to remove existing barriers."[112] Hospitals have a lack of elevators to doctors' offices and inaccessible washrooms.[113] Similarly, many universities are also in this type of predicament where retrofitting may not be the best solution to old buildings. Queen's University can be seen as an example of this where although many of the buildings have been retrofitted to be accessible through back doors or extensions that include accessible washrooms, much of the campus still remains comparably inaccessible in relation to other campuses.

In many of the buildings on Queen's University's campus, accessible doors are lacking as well as ramps (that can be too steep for wheelchairs). While OUSA recognizes that the age of a campus must be preserved and that history is contained within the walls of the historic buildings on campus, there is no exemption for heritage buildings within the OHRC's policy on accommodating those with disabilities.[114] We recommend that all areas on campus be made accessible however if universities are to make existing buildings more accessible, they should be able to apply for grant funding from the province to do so. This should not be categorized as deferred maintenance funding and the building plans would be subject to review by the government.

In addition, there are minimum standards that universities have to comply with in order to be AODA compliant, however it is proposed that the provincial government may envelope funding available for those institutions that wish to go above and beyond. In preparation for the transition of these buildings into accessible environments, priority should be put to "high-traffic" areas such as recreational centres, cafeterias, libraries, lounges, et cetera.

An example of the envelop funding above would be the Ontario Trillium Foundation (OTF) which provides community-based initiatives to public sector or non-profit companies including: seed grants, grow grants, capital grants, and collective impact grants. The OTF awards approximately $110 million every year to 1,300 public benefit sector organizations. This fund supports programs or initiatives to increase such things such as accessibility, physical lifestyles, youth engagement, and increased economic stability.

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[111] Mayo Moran, *Second Legislation Review of the Accessibility for Ontarians with Disabilities Act, 2005* (Mayo Moran, 2014).
[112] Mayo Moran, *Second Legislation Review.*
[113] Ibid.
[114] Ontario Human Rights Commission, *Policy and guidelines,* 26.

LACK OF AN EDUCATION STANDARD

> **Principle:** Similar to the customer service standard, an education specific standard should exist and be enforced within the AODA.
>
> **Principle:** All students must have a place or designate to contact if their institution is not in compliance with AODA, or is not meeting their AODA obligations.
>
> **Concern:** Institutions typically leave the advocacy for an "accessible campus" to the accessibility-related office on campus; however this typically leads to a bottom-up approach, which can be especially difficult for lower administration to navigate.
>
> **Recommendation:** The Ontario government should encourage senior administration to take a leadership role in ensuring issues of accessibility are heard and understood, and responded to in a timely manner.
>
> **Recommendation:** The Ontario government should require the provincial ombudsman to oversee issues of non-compliance in universities.
>
> **Recommendation:** The provincial government should adopt an "education standard" in the AODA regulations to cover topics such as physical access, support services, training, timelines, universal design principals, and a permanent program to educate students on accessibility.
>
> **Recommendation:** The provincial government should mandate that municipalities include meaningful representation from students on their accessibility advisory committee. It would be preferred that a student with a disability is included in the "majority" that needs to be represented.

Since 2005, the government of Ontario has taken a leadership approach to accessibility. By enacting specific standards for parts of society, regulations were made to control the future actions of engineers, the customer service industry, and the technology realm. However, one specific sector that was unfortunately left out of these regulations was the education sector.

Although universities are bound by rules for accessibility within the five accessibility standards, there is nothing that specifically pertains to educational institutions. The advocacy for ensuring that institutions comply with these standards typically comes from the accessibility-related offices or departments on campus, which can make navigating the post-secondary political scene a challenge for junior administrators.

If a professor is not meeting a student's academic accommodations, it is typically the responsibility of the student or the student through the accessibility office to take the issue up with senior administration or faculty members. Leadership on accessibility issues should come from the top-down, wherein Presidents make it one of their priorities to ensure compliance. Additionally, the provincial government should be more transparent in assigning an office to be responsible for accessibility complaints.

As noted in the *Second Legislative Review of the AODA*, "education is not just another business."[115] It was stated that, "education is now buried in the existing standards and requirements are vague, leaving organizations to guess how general principles apply to them."[116] Due to the complexity of the sector, OUSA would support the recommendation that an education standard be created to explain the following content:

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[115] Mayo Moran, *Second Legislation Review*.
[116] Ibid.

- Physical access to all school buildings;
- Special support services for students and teachers;
- Training for all teachers on all forms of disability and the impact of disability on the learning process;
- Sensitivity training for all students on disability issues;
- Timelines for the accommodation process at the post-secondary level;
- Universal design principles to be built into all courses, programs, and learning tools; and
- A permanent program to educate school students on accessibility, including a sample curriculum. [117]

Additionally, municipalities that have more than 10,000 residents are required to have an accessibility advisory committee.[118] It is mandated that people with disabilities make up a minimum of 50 percent representation on the committee.[119] OUSA recommends that the provincial government mandate students be meaningfully represented on those committees where post-secondary institutions exist, and ideally a student with a disability be represented on the committee.

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[117] Mayo Moran, *Second Legislation Review.*
[118] Government of Ontario, "Municipal Accessibility Advisory Committees," Government of Ontario, accessed February 13, 2016, https://www.ontario.ca/page/municipal-accessibility-advisory-committees.
[119] Ibid.

INACCESSIBLE COURSE MATERIALS

Principle: All universities, as of December 31, 2015 must produce accessible textbooks.
Concern: Many course materials are unable to be converted into accessible versions when students ask for them.
Recommendation: The Ontario government should enforce AODA requirements that any courseware and course materials required by a public institution have alternate accessible formats available upon request.
Recommendation: Accessible course materials should be available in a reasonably timely manner.

According to the accessibility rules for educational institutions, universities by December 31, 2015 need to provide accessible versions of all textbooks.[120] Currently, the way course packs are produced, does not allow for easy conversion into accessible documents for those with learning impairments or learning disabilities. While publishers typically have accessible versions of textbooks already created, course packs are typically created by bookstores and it can be harder for students to recreate the material. It therefore is left up to accessibility coordinators to track down faculty members or contact the bookstores and do all of the leg-work themselves.

The *Second Legislative Review of AODA* found that participants raised concerns about the need for accessible versions of information "on request."[121] They proposed, "That all educational resources should be accessible, with no need for a request." However some post-secondary stakeholders said, "This might not be a wise use of resources as there may turn out to be no demand for many of the materials."[122]

The recommendations from the report stated that the information and communications standard in the AODA needs to address the concerns of accessibility for continued development and not for where technology was in 2005.[123] The provincial government should ensure that universities are compliant with this AODA standard prior to their filing of accessibility reports in December 2017.[124]

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[120] Government of Ontario, "Accessibility rules for educational institutions," Government of Ontario, accessed March 4, 2016, https://www.ontario.ca/page/accessibility-rules-school-libraries#section-4.
[121] Mayo Moran, *Second Legislation Review*.
[122] Ibid.
[123] Ibid.
[124] Government of Ontario, "Accessibility rules for educational institutions."

POLICY STATEMENT

Students with Disabilities

Whereas: All willing and qualified students in Ontario must be able to access and excel within Ontario's post-secondary education system.

Whereas: All campuses must be free from social, physical, or academic barriers that limit accessibility for students with disabilities.

Whereas: Campus accessibility must include an open and accepting community of students, faculty, and staff.

Whereas: Students should not feel like their disability is a limitation, there should be opportunities for people to find others who share similar life experiences.

Whereas: Adequate information on campus support should be available and publicized to prospective students with disabilities throughout the registration process.

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

Whereas: Information on disability services and summer transition programs for students with disabilities should be readily available to all students accepted into an Ontario university.

Whereas: Disabilities take on various forms and therefore each student's support should be tailored to their specific disability.

Whereas: Support services must be available for students with all types of disabilities.

Whereas: Accessibility Office's should be able to access the resources necessary to provide adequate support to all students in need in a timely and efficient manner.

Whereas: All students should be accommodated for their disability, in accordance with the Ontario Human Rights Commission policies, up to the point of undue hardship for the institution and without the need to disclose their diagnoses.

Whereas: Any documentation in which accommodations are based off of should not include specific diagnoses in any institution and should only focus on functional limitations.

Whereas: Accommodations for students with disabilities should be a priority for all involved in the university, however should be organized by Accessibility Offices.

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

Whereas: Academic accommodations must be consistent, reliable, and easily accessible.

Whereas: Students must feel safe when seeking accommodation.

Whereas: Students with disabilities must be aware of institutional assistance available to meet different accessibility needs.

Whereas: Students with disabilities should be made more aware of the institutional assistance available to them through wide promotion of this assistance inside and outside of the classroom.

Whereas: The post-secondary sector needs to be adequately supplied with proper training measures for staff and faculty to be properly able to address a student who is in need of accommodation with the classroom.

Whereas: Students with disabilities must be provided with adequate financial assistance to cover the costs associated with their disability.

Whereas: Students with temporary disabilities should also have access to disability-related financial assistance.

Whereas: Students with disabilities should have access to adequate financial resources, even without aid from private lenders.

Whereas: All students should have access to information about the financial assistance available to them in post-secondary education.

Whereas: All universities must be moving towards and be compliant in the AODA by 2025. This includes all timelines referenced in the Public Sector: 50+ employees standard of the act.
Whereas: All accessibility initiatives taken on by universities should support the AODA's four principles: dignity, independence, integration, and equal opportunity.
Whereas: All universities must file an accessibility report annually that shall be made available to the public.
Whereas: Similar to the customer service standard, an education specific standard should exist and be enforced within the AODA.
Whereas: All students must have a place or designate to contact if their institution is not in compliance with AODA, or is not meeting their AODA obligations.
Whereas: All universities, as of December 31, 2015 must produce accessible textbooks.

Be it resolved that: The provincial government and universities should incorporate universal design for learning theories into all infrastructural, instructional, and strategic planning processes.
Be it further resolved that: The provincial government should ensure institutions follow the Guidelines on Assessing Accommodation Requirements for Persons with Disabilities, to ensure all students are receiving equal treatment.
BIFRT: The provincial government should require all university Accessibility Offices to operate on a social model of disability.
BIFRT: Institutions must require teaching staff to create classes using the Universal Design for Learning pedagogy.
BIFRT: The province of Ontario should mandate that institutions provide comprehensive training strategies to faculty, front line staff, and student leaders to help reduce and eliminate stigma as a barrier for students with disabilities.
BIFRT: Institutions should work to integrate stigma reduction strategies into core annual events, including welcome or orientation weeks, campus tours, and social events.
BIFRT: Institutions must ensure students have the autonomy to choose whether or not they want to disclose their diagnosis.
BIFRT: The Ontario Universities' Application Centre (OUAC) should list disability accommodation requirements and procedures for every Ontario campus.
BIFRT: All universities should provide summer transition programs for incoming students with disabilities.
BIFRT: The government should outsource research into the most effective types of transition programs and support services for students with disabilities to ensure consistency across institutions.
BIFRT: Universities should receive enveloped funding, for their Accessibility Offices, to ensure the proper training of faculty and staff on disability accommodations and support services.
BIFRT: The Ontario government should fund a central intake officer or case manager at every postsecondary institution.
BIFRT: The government should participate in consultation every two years with Accessibility Offices to ensure current funding needs are being met.
BIFRT: The government should provide enveloped funding for program development within Accessibility Office's, if funding is determined insufficient through the consultation process.
BIFRT: Institutions must provide accommodations based on functional limitations, and not based upon specific diagnoses.
BIFRT: The provincial government should mandate province-wide documentation standards and guidelines to ensure students with disabilities have adequate access to accommodations.

BIFRT: Institutions should not require students with permanent, registered disabilities to seek additional documentation, sometimes in the form of a doctor's note, in times when their disability impedes their ability to succeed in the classroom.

BIFRT: The provincial government should extend OHIP coverage to include doctors' notes for students with disabilities when they require accommodation relating to their disability.

BIFRT: Institutions should negotiate with UHIP to extend coverage to include doctors' notes for students with disabilities when they require accommodations related to their disabilities.

BIFRT: The provincial government should mandate that students with permanent disabilities only have to provide documentation of their disability once upon arriving to the institution, unless their needs or accommodations have changed.

BIFRT: Students should not be required to hand their accommodation documentation directly to a professor, and should have the option to have it submitted through the appropriate office in the institution.

BIFRT: Institutions must provide more information within the classroom on where students can access varied and flexible academic accommodations.

BIFRT: Accommodations should be delivered in a timely manner, reflective of academic dates and course schedules.

BIFRT: Institutions should make interim accommodations available for students with disabilities while they are waiting for their full accommodations.

BIFRT: Institutions must ensure faculty and teaching assistants incorporate inclusive learning into their curriculum that aligns with the Universal Design for Learning.

BIFRT: Accessibility Offices should be responsible for working with instructors and staff to implement students' academic accommodations.

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

BIFRT: Institutions should offer admissions scholarships to all students with registered disabilities, not just full-time students.

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.

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BIFRT: The Ontario government should enforce AODA requirements that any courseware and course materials required by a public institution have alternate accessible formats available upon request.

BIFRT: Accessible course materials should be available in a reasonably timely manner.