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ONTARIO PUBLIC SCHOOL BOARDS' ASSOCIATION

Leading Education's Advocates

October 4, 2021

To: The Education Standards Development Committee
       educationSDC@ontario.ca

Re: Development of proposed Kindergarten to Grade 12 (K-12) education standards
       – 2021 initial recommendations report

The Ontario Public School Boards' Association (OPSBA) is pleased to provide feedback to the Ministry of Education on the development of proposed Kindergarten to Grade 12 (K-12) education standards and the related initial recommendations report.

OPSBA and its member school boards are committed to supporting and meeting the objectives and requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) with its goal of an accessible Ontario by 2025. Our beliefs are founded on the idea that improving student achievement and student engagement is directly linked to ensuring that we work collaboratively for the social, emotional, mental and physical well-being of all children and youth. As always, we recognize that school boards must be safe, inclusive and welcoming places, not only for our students and families but the entire school community. Students and staff are entitled to a safe learning and working environment.

We sought the feedback and opinions of our trustee-led Education Program and Policy Development work teams and staff from our 31 member boards on the 10 areas of the initial recommendations outlined in the report. For each section, the following questions guided feedback:

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- What resources do school boards need to implement the recommendations in the section?
- Are there any legislative/regulatory barriers to implement the recommendations?
- Are there any local operational issues to implementing the barriers?

The recommendations were generally supported, and viewed as positive and steps in the right direction as related to equity and inclusion. However, two common themes emerged:

1. Concern for the significant cost and number of resources (technology, material and human) that will be needed to ensure the recommendations are effectively implemented within the designated timelines. Should these recommendations be finalized, OPSBA will be respectfully advocating for appropriate funding levels to support implementation.
2. Recommendations and processes that school boards are responsible for implementing always align with provincial legislation and regulations, including the Human Rights Code, the AODA, the *Education Act* and school board collective agreements.

As Ontarians, we all need to take ownership of accessibility. The public education system needs a corresponding commitment from the Government of Ontario to make education accessible by collaboratively working together to create an implementation plan that clearly defines responsibilities, accountability and outcome measures supported by both monetary and human resources and policy/regulatory changes. An online portal, managed by the Government through the appropriate ministry, to share best practices for all identified areas would be very helpful for school boards.

Responses and recommendations are identified below. For additional detailed comments from school boards in each section, please see the *Appendix*.

Section One: Attitudes, Behaviours, Perceptions and Assumptions
To address Attitudes, Behaviours, Perceptions and Assumptions requires understanding and transforming societal beliefs, norms, and expectations. The successful implementation of the recommendations addressing other barrier areas is impossible without first identifying and acknowledging ingrained ableist thinking that shape values, practices and priorities. Five key recommendations issued reflect how

attitudes, behaviours, perceptions and assumptions underpin the work of all other small groups, given human and organizational behaviour.

There was general agreement with the proposed recommendations, especially related to supporting inclusive practices that capture the strengths, aspirations and needs of all students, ensuring practices are consistent, and including student voice, particularly those with lived experience.

All K-12 educators, regardless of seniority, should be provided with training.
The central question to be addressed is how to find and devote sufficient time to this work while also addressing all of the other Ministry of Education priorities that need to be addressed. Time and funding are the usual barriers and more resources would be needed.

Section Two: Awareness and Training
Societal attitudes, behaviours, perceptions and assumptions toward students with disabilities in the K-12 education system can be attributed to gaps in knowledge and training, or awareness of barriers faced by students with disabilities. The group met early on in the process to develop recommendations with respect to gaps in knowledge acquirement for education practitioners based on lived experiences of group members. Central to discussions was the concept that Universal Design for Learning was absolutely essential for educators to understand and to apply if learners were to succeed.

School boards agree that common training, especially for Universal Design for Learning (UDL), is foundational to achieving the intent of the recommendations. This approach would support inclusive practices that capture the strengths, aspirations and needs of all students, ensuring differentiated practices include student voices.

OPSBA recognizes that school boards and the government need training around anti-ableism from people who have lived experience. Student voice needs to be captured and included so that students with disabilities are recognized in the equity work in school boards. School boards, especially smaller ones, do not currently have the human or financial resources to create and deliver more training. Especially given the current COVID-19 pandemic circumstances, perhaps the aggressive timelines should be revisited. Online training is a reasonable way to provide mandatory training for all staff. That said, small to medium group sessions lend themselves to greater opportunities for reflective discussion, dialogue and questions. A mix of small and medium-sized in-

person PD, when permitted, with large online training sessions facilitated by people with lived experience, would be valuable.

Currently, at the school board level, accessibility resources are made available in various ways, including at schools, administrative offices and on school and board websites. Staff and volunteers are regularly trained on the AODA and applicable board policies and procedures, as required under the Accessible Customer Service Standard. School boards, and OPSBA, provide accessible materials/communications to families, students, staff and community members on request to respond broadly to accessibility needs, and thus inform future development of materials and processes.

"(Our board) welcomes the addition of inclusive, accessible and equitable training for new teachers' qualifications as well as strengthening an equity lens on performance review and performance management and on teaching and designing lesson plans for the full engagement and participation of students with disabilities. We believe these recommendations will support staff in modeling equitable, accessible and inclusive behaviours and attitudes when interacting with students."

Within the classroom, inclusiveness and awareness of others' needs is a priority. Rather than being a direct curriculum topic, this tends to be more of an approach and philosophy that is integrated into classroom practice. Speakers and researchers are brought in for professional learning and community events are planned for parents/guardians to expand their understanding.

School boards also continue to work to foster understanding that accessibility at schools needs to extend beyond students and staff to include the experiences of parents/guardians, caregivers and siblings at school events.

Section Three: Curriculum Assessment and Instruction
Disability intersects with differing identities, including race, culture, language, gender identity and expression, sexual orientation, creed, age and ethnicity. The recommendations focus on standards, actions and accountability measures that ministry, school boards, schools, colleges of education and educators need to address in the review, development, implementation and monitoring of curriculum, assessment and instruction to ensure accessibility, equity, and inclusion for all students with

disabilities.

While school boards agree with the comprehensive recommendations in this section, there was concern regarding the immediate need to ensure that knowledge on ableism is an integrated component in all curricula. There should be a focus on implementing curriculum throughout the K-12 curriculum that would teach students about barriers faced by students with disabilities. Who within the Ministry of Education will address these areas?

Increasing and ensuring opportunities for all students to learn, and participate in field trips, extra-curricular activities, and sports teams needs to be addressed. The development of curricula and assessment that focuses on the learning skills, knowledge, attitudes and values that specifically address executive functions is supported. We would suggest that more options for elementary level sports, outside of team sports, be provided, to ensure physical, mental, socioeconomic or other barriers do not prevent student participation. This would help many students, including new Canadians, feel more inclusion in a school's culture and environment.

However, most of these recommendations are not new to the public education sector and should already be in place. School boards suggest the current obstacles to implementation are available staff time, funding, and competing priorities/focuses.

Funding and resources provided for educators and students/families in this area needs to reflect the needs of the students and the complex multifaceted programs that are required to support student success.

Section Four: Digital Learning and Technology
There is a need for school boards and government ministries to remove systemic barriers for the inclusion and full participation of student and staff in the school and community. In the context of digital learning and technology, this requires that boards and government ensure all digital resources are fully accessible to students and staff with disabilities. Recommendations in this section also address training and funding barriers that boards in particular face to ensuring the proper use of digital learning technologies.

Technology should be used as a tool to access learning; and staff need to know how to support students with a disability in order for students to fully engage in learning. A first

step should be an appropriate provision of technology for students with accompanying training for staff. Concerns remain about cost and availability of technology and internet access, especially in rural and remote areas.

The Government of Ontario should make a commitment to include the lens of accessibility (not only physical accessibility) when making decisions around purchasing or making available resource materials, creating curricula, selecting software for licensing, systems, etc.

"We believe in the importance of making digital resources fully accessible to students and staff with disabilities. We continue to work on making all information that our board produces accessible in a variety of formats and we are continuing to make this a focus moving forward."

In order to implement these technological recommendations, funding would be required for resources such as the purchase of any necessary software and subsequent training.

Section Five: Organizational Barriers
The initial consultation for the Education Accessibility Standards identified a significant number of organizational barriers, particularly concerning special education processes such as the Identification, Placement and Review Committee and the Individual Education Plan processes. Parents raised concern about their lack of meaningful participation in these processes. Many concerns were also raised about exclusions/refusal to admit which disproportionately impact students with disabilities, understanding of disability rights and challenges in the delivery and access to student support provided in schools by community agencies funded by other Ministries. Transitions were also identified as an organizational barrier, including transitions into school, between schools, and out of secondary school to postsecondary education, employment or community living. The recommendations are based on the extensive knowledge of the education system of committee members, their personal or professional experiences, and input from the sectors they represent.

The recommendations in Section Five are supported and many school boards are already doing an excellent job in this area. However, they are quite ambitious and smaller rural and remote school boards in particular do not have the fiscal or human resources to implement them, especially given the current lack of available specialists/experts in Ontario (facility design, engineering, builders, Human Resources,

etc.). The logistical barriers were described as "immense," and include the need for improved collaboration between school boards, agencies, and ministries. These organizations have competing philosophies, mandates and interpretations, which would need to be addressed if local change is to be attained.

Section Six: Social Realms
The area of social realms is often overlooked as being an important part of education and should be seen as an integral part of the student's education and development. Social realms should not be viewed just as social activities outside the classroom but also in the classroom where the social interaction among students is an integral part of learning process.

Ongoing and consistent expectations for school and teacher practices needs to be weaved throughout legislation, regulations, and resources moving forward; this cannot be separated from curricula.

While we agree that all events should be accessible to all students and staff, if hosting in accessible locations is required, there should be an expectation that all available facilities are required to be accessible. This should be the responsibility of everyone involved in the planning of events - not just designated accessibility compliance staff at a school board.

The suggestion to hire a transitions navigator specifically for students with developmental disabilities/complex medical needs was supported. This navigator could assist with navigation in post-secondary education, as well as community options.

In terms of transportation, many of the recommendations are already being implemented with transportation consortiums.

It would be beneficial if the ministry worked with School Mental Health Assist (SMHA) to develop the recommended workshop to address bullying and cyber-bullying in order to have consistency across the province. SMHA regularly provides evidence-based provincial support in areas related to mental health and well-being.

School boards are committed to changing attitudes, beliefs, and values related to accessibility for all. This work has been initiated for quite some time, but the

recommendations will require an additional significant commitment of funding and resources to be extended to boards in order to make them actionable.

Section Seven: Physical and Architectural Barriers
The intent/rationale of these recommendations is to ensure that as soon as possible, and no later than January 1, 2025, the built environment in the education system, such as schools themselves, their yards, playgrounds, etc., and the equipment on those premises (such as gym and playground equipment) would all be fully accessible to persons with disabilities and would be designed based on the principle of universal design. Where school programs or trips take place outside the school, these will be held at locations that are disability accessible. The intent/rationale is also to ensure that no public money is used to create new barriers or perpetuate existing barriers in the school system.

These recommendations are supported but school boards will need additional funding to meet all the requirements that are being recommended under this section, as well as a commitment from government to include accessibility requirements as part of the business cases when planning and designing new facilities. It was suggested that the Ministry of Education could hire accessibility consultants when reviewing business and infrastructure plans.

There are significant legislative and regulatory barriers that impact the Physical and Architectural Barrier recommendations. Specifically, the Building Code requirements are primarily designed for adults, which can create challenges for K-12 students or those with other needs that do not fit "normal" ergonomics. The Building Code also doesn't take into consideration some specific requirements relating to school functions (i.e. lockdown requirements, etc.). A specific example is requiring electric strikes in fire separations to be Fail-Safe (remain unlocked during power interruptions), which creates issues and contradict school lockdown procedures. There are also significant financial challenges as accessibility alterations and upgrades to existing buildings are expensive and pose a significant strain on renewal budgets. There is (currently) no separate funding from the

"To ensure fully accessible built environments, the ministry should have requirements for boards around new builds and also increase funding for new builds so that boards are provided with adequate funding to include all accessibility features."

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government allocated to address these needs. Also, current funding levels for new schools and facilities is not sufficient to incorporate all accessibility features and address all barriers.

The Government should consider changes to the relevant legislation and regulations that would make gyms, sensory rooms, and accessible outdoor play spaces designated as "learning spaces" and included in the calculation of the capacity of a school, albeit separate from standard classrooms so as to not potentially allow for the removal of such spaces in the future.

We would also ask that the government lift the moratorium on school closures and release the revised Pupil Accommodation Review Guidelines (PARG) as soon as possible. This moratorium has had a negative impact on school boards' ability to ensure their current facilities are fully accessible to persons with disabilities.

Section Eight: Planning for Emergencies and Safety Framework
The current COVID-19 pandemic has provided an opportunity to test and evaluate the education system preparedness for a large-scale emergency. Barriers and gaps previously identified by the K-12 SDC related to students with disabilities were heightened or increased. Additional barriers were also identified by committee members. As a result of these observations, the K-12 committee created the Planning for Emergencies and Safety Working Group to identify additional barriers faced by students with disabilities during the pandemic and made recommendations to ensure that the needs of students with disabilities are met during any emergency, when the emergency affects the ability to delivery education and health services.

We agree with the proposed collaborative, coordinated, multilevel government and education inter-sectoral approach to the development of an emergency plan that is responsive and inclusive.

School boards have learned much from the COVID-19 crisis. Boards worked hard to support students on an individual basis but having a central plan in place for future similar events is important.

It is also important to recognize that many school boards do not have individuals with a sole responsibility for accessibility compliance. Often the person who is responsible for

accessibility is also responsible for other areas as well, so increased funding for a lead in the area of accessibility would be helpful to smaller or mid-sized boards.

Section Nine: Timelines and Accountability
The rationale for the Timelines and Accountability Group relates to the complex and demanding work to be completed by obligated organizations – school boards, transportation consortia, government ministries – with respect to implementation of the Education Accessibility Standards regulatory requirements by 2025. The group's mandate was to develop an implementation framework, a set of accountability/compliance mechanisms for obligated organizations and specific timelines for the completion of the requirements of the Education Accessibility Standards.

There is agreement with the recommendations and that school board accountability is important. However, a designated person at every school board would need to be assigned to provide oversight to meet the requirements of these recommendations. The scope of the draft recommendations should be mapped onto a multi-year plan, with reasonable timelines given the resources available to school boards. Each board will need a dedicated person(s) with primary responsibility to ensure accountability and monitoring of the implementation of the standards.

There is significant concern that the timelines contained in the recommendations are not realistic and are too aggressive, especially given the COVID-19 pandemic circumstances. Meeting all of the recommendations' expectations would require a massive influx of funding, training, and resources from the Ministry of Education level.

"We believe that our board does an exceptional job of transitioning students identified with high needs into school and between schools. We hold over two thousand transition meetings a year for a board with 37,000 students. Parents are provided with notes from Transition Meetings."

Section Ten: Transitions to and Within K-12
The Technical Sub-Committee comprises representatives from both the K-12 and Postsecondary Education Standards Development Committees. The sub-committee's mandate, as received from the Minister for Seniors and Accessibility, was to identify barriers that students with disabilities experience during transition, with a special focus
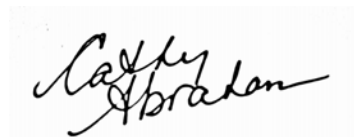
on transition planning between the sectors, and to make recommendations for removing these barriers.

The recommendations here are strong and effective, with a number already in place in school boards, but time, funding, and resources would need to be drastically increased to ensure they are reached in an effective manner in every board. We agree that there needs to be a stronger focus to ensure integrated transition planning.

School boards should be provided with support to enact these recommendations, such as transition resources, guidelines and other materials that facilitate targeted instruction on self-advocacy, disclosure and transition planning.

Thank you for this opportunity to provide feedback on the recommendations provided by the Education Standards Development Committee. We look forward to continuing our participation in the process as it moves forward in the coming months.

Sincerely,

Cathy Abraham
President

CC: The Honourable Raymond Cho, Minister for Seniors and Accessibility
    The Honourable Stephen Lecce, Minister of Education
    Nancy Naylor, Deputy Minister, Ministry of Education
    Denise Cole, Deputy Minister for Seniors and Accessibility
    Michael Eugenio, Manager of Tour & Stakeholder Relations, Minister Lecce's Office

The Ontario Public School Boards' Association (OPSBA) represents English public district school boards and public school authorities across Ontario. Together our members serve the educational needs of nearly 70% of Ontario's elementary and secondary students. The Association advocates on behalf of the best interests and needs of the public school system in Ontario. OPSBA believes that the role of public education is to provide universally accessible education opportunities for all students regardless of their ethnic, racial or cultural backgrounds, social or economic status, individual exceptionality, or religious affiliation.

Appendix A: Additional Comments from School Boards

Here is more of what our Member Boards are saying:

Section One

- Resources required by district school boards:
  - Active participation of people with disabilities should include students, including students with intellectual disabilities and those with Autism
  - A dedicated, annual PA day is essential which includes training on the History of Disability in Ontario and beyond, person-first language.
  - Student voice; boards should be creating an index for students with disability to monitor both school and system progress towards a social model of disability instead the current foundation of a medical model of special education. A disability studies course should be mandatory for all post-secondary programs and the Special Education AQ courses need to be rewritten by experts from the Canadian Research Centre of Inclusive Education.
- Legislative and other barriers to implementation:
  - Special education legislation for segregated, self-contained classes leads to lack of ownership for learning for students with disabilities by regular classroom teachers; there is no evidence to support the effectiveness for segregations; beliefs continue that disability means not capable of learning to a high degree or well, promotes low expectations, streaming into segregated classrooms - instead students with disabilities that are placed in segregated settings experience high rates of unemployment.
  - EDU needs to fund researchers to conduct a literature review with a post-secondary institution on segregation.
  - The OHRC Policy document on Accessible Education for Students with Disabilities supports segregated placements. The OHRC needs to involve the Canadian Research Centre on Inclusive Education to align with other provinces (BC, ALTS, NB) that have done more to include students with disabilities and promote higher expectations for these young people and reduce stereotypical beliefs, attitudes and practices. This document needs to be revised to help boards move away from practices that marginalize students with disabilities.
  - Curriculum and instruction should include disability; a mandatory course in disability studies in secondary should become a graduation requirement.
  - The TeachABLE Project by OESC should be funded by EDU and a working committee with representation from school boards could be facilitated by OESC to add more mentor texts (K-12) with accompanying lesson plans on disability should be available for use with staff in district school boards.

- o Lastly, the draft standards indicate the review of relevant legislative and policy documents: international, national and provincial but there is no adjustment to current legislation in special education based on the following: United Nations CRPD: Committee on the Rights of Persons with Disabilities - General comment No. 4 (2016) on the right to inclusive education.
- We believe strongly in the recommendations set forth in the report. It is unfortunate that COVID-19 impact has taken away focus from some of the areas mentioned in the report. It is important to consider lived experience of persons with disabilities. We are moving forward in our Board with establishing a network of teachers and other staff with disabilities to get further input on accessibility issues. It would be helpful if the Ministry would provide that training around the importance of inclusion so that there was consistency across the province. We would welcome the opportunity to provide age-appropriate curriculum to teach about inclusion. It would be invaluable to have the Ministry develop a province-wide age-appropriate curriculum to teach all students, school board staff and families of school board students about the inclusion of and full participation of students with disabilities.
- It is feasible to implement through an accessibility advisory committee structure. While it is helpful for the Ministry to provide sample programs, resources will be required to deliver effectively, such as access to funds to support training. PA Days have a wide range of priorities already. This work requires opportunity for deep learning rather than surface level. To do this work with integrity and in a meaningful and integrated manner, funding for an accessibility/equity lead would be valuable. Smaller districts are spread thin with the Ministry's wide range of important and urgent priorities.
- We support the need to equity and inclusion, as well as developing opportunities to educated and train staff. Some of these are resources intensive and will require additional supports form the Ministry.
- Plans to create an affinity group for staff and persons with disabilities to be able provide input on policies, curriculum and programs. It would be helpful to have a provincially supported recruitment strategy for people with disabilities.
- Any student network should allow for online meetings due to barriers with time and transportation. The affinity groups should be continuously supported through safe and brave spaces that encourage and maintain a welcoming environment
- We would welcome teacher candidates with their OCT who have been trained in specific curriculum that is inclusive and accessible for students with disabilities.
- We would welcome specific training developed by the MOE on the importance of the inclusion of and full participation by students with disabilities.
- It would be helpful for recommendations to include targeted recruitment of persons with disabilities.
- Hiring AODA-dedicated staff who will monitor the implementation of AODA plan including targeted recruitment.
- 4.2 b.i. may come across as performative in nature.

- We have communicated our AODA plan and the school board's commitment on our website.
- Question of what indicators would be on performance evaluations to determine if the staff person has demonstrated the inclusion and full participation of students with disabilities – Not all staff would be able to speak to this depending on their work and area of focus.

Section Two

- Funds to support professional learning networks to support improved teacher practice on UDL, DI and keeping students on the provincial curriculum and training teachers how to modify within the grade level curriculum for almost all students. Special Education does not receive dedicated funding or funding that focuses on instruction. Instead this funding flows to the program depts. only. This current funding structure maintains the status quo of lack of understanding of UDL. Legislative and other barriers: Learning for All, K-12 needs to be updated to include equity, modifying within grade level and so on. We also need a dedicated PA Day on disability.
- We believe in the importance of the recommendations put forward here. We work with (a local organization) to provide assistive technology training to teachers, including classroom teachers. We will review this practice to enhance it. Although we include Universal Design for Learning in all of our Special Education PD opportunities, it would be beneficial to make it mandatory training which should begin in Faculty of Education programs.
- (Recommendation) 7 - great idea. This type of training would be valuable for school districts. (Recommendation) 8 - funding for a consultant/trainer would be valuable, particularly if we are looking to support a job-embedded in-school training model. SEA funding cannot be used to increase staff compliment. (p. 1 SEA Guidelines "Eligible expenses related to the internal hiring of technicians and/or trainers, are permitted through the SEA Per-Pupil Amount (PPA) provided they do not create new full time equivalent (FTE) positions.")
- General Comments:
  - Online general awareness courses are easily implemented. In-person, school level training may be more difficult to implement, simply due to required release time and coverage. More details are required on the length of the training (i.e., half day, full day, 30mins), the intended audience (i.e., all staff, certain groups) and interval of training (i.e., annual, once a term, monthly) is needed.
  - Limitations with in-person delivery include coverage costs or paid time which can make in-person training cost prohibitive. A challenge with in-person training can include "fail- to-fills" within the schools where staff can not attend training or the school is left short for instruction or supervision.
- Specific to Recommendations Comments:

- o To be able to implement training as recommended in item 6, a team of dedicated staff or accredited training agency would be required to manage the volume of training and ensure consistent delivery of the training at pre-service and throughout the school year. We have an existing annual mandatory training package for new and existing employees that is tracked for completion, and would welcome adding an Accessibility for Ontarians with Disabilities Act, 2005, Ontario Human Rights Code module (per recommendation 7).
- o We agree with recommendation 7 that the Government of Ontario should develop and provide the model for training and it should be developed in consultation with persons who self-identify as having a disability as well as school boards. This would ensure consistency in the materials. We would look forward to receiving a module created by the Government of Ontario and would implement it across the system in a mandatory way.
- o Having the Government provide a list of qualified trainers or a training for Board staff may be helpful as well to support with both recommendation 6 and 7.
- o As for item 8, we provide assistive/adaptive technology training for staff, including Special Education staff, as necessary, based on the needs of the site. We would be prepared to enhance what we are currently doing based on recommendation from the Government of Ontario.

Section Three

- (Our school board) is in alignment with assessment and instructional practices that honours the individual and intersectional identities of students. And, as such instruction and assessment that is culturally relevant and responsive centres the unique experience of each student to increase opportunities and access to barrier free education that supports their success and well-being. The resources required to implement these recommendations within the proposed timeline include: curriculum resources for learning skills and executive functioning for those in secondary school with developmental disabilities require clear simple language, concrete, age appropriate, repetition and visuals to support their learning of these skills. Human resource staff required in schools to gather and disseminate information, communicate with families who require the information frequently and with follow up to ensure clarity and completion. Further support for families to clarify their eligibility for ministry support through ODSP, DSO, Passports etc. As well, assigned staff would support students with developmental disabilities who often cannot self- manage these important steps to accessing support. If schools are required to identify a person, additional funds for ongoing training, release time and PD support. Operational Barriers include: IEP's and psych assessments that are usually removed for students when their OSR's move to inactive. Students and families often discover they need these documents years later, when the student has

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decided they are ready to attempt post-secondary. Electronic storage of documents needed for accommodations (psych assessments and last /iep) should be stored for 10 years and accessible to students through their schools. Students with a developmental disability require specific parameters be met in their psych assessment, it doesn't need to be re-done if they are met but someone has to assess if parameters (both IQ scores and adaptive skills are included), ensure families get a copy and use it to apply to DSO between the ages of 16 and 18. A central transition navigator dedicated to tracking, informing and working with families to meet these needs would identify this barrier to accessing supports post 21. Barriers to in-depth discussion and thorough transition plans include a lack of release time to meet and create documents. More funding for assessments and more robust assessments are needed to ensure students are accurately identified, and that assessments are updated prior to completion of education and wait times for assessments can be decreased. Ensure transportation for work experience done through congregate specialized programs is provided by the board as well as for co-op placements.

- Funding for special education depts for resource development on disabilities and release time. Curriculum and instruction should include disability; a mandatory course in disability studies in secondary should become a graduation requirement. The TeachABLE Project by OESC should be funded by EDU and a working committee with representation from school boards could be facilitated by OESC to add more mentor texts (K-12) with accompanying lesson plans on disability should be available for use with staff in district school boards. EDU continues to promote and therefore, allow alternative curriculum or life skills programs for students with intellectual disabilities. This type of programming has been allowed since the inception of special education in Ontario in 1980. No other group of students would be provided with programming that is 41 years old and has no accountability or monitoring structure. EDU needs to remove alternative curriculum. Because of the scope of the provincial curriculum, the learning expectations of all students can be found within. EDU should consider including special education in funding agreements for school boards. PPM 159 has been a hindrance to monitor student progress for students with disabilities - 'professional judgement' is often cited as a reason to not implement evidenced-based practices. Teachers no longer have to implement system programming and assessment. Local labour organizations would support members who offer a 'life skills' program.
- We have previously provided PD around cultural bias but would find it helpful if the Ministry of Education provided PD in the area of cultural responsiveness, again with the idea that there would be consistency across the school boards. Our students with special education needs and disabilities are prioritized for assessments including psycho-educational assessments. The creation of an accessibility hub where educators could access accessible, equitable and inclusive curriculum online through the Ministry would be a valuable tool.
- (Recommendation) 10 - board teams require training to fulfill this requirement.

- What resources do school boards need?
  - Training in CRRP and the impact of intersectional identities on students in order to understand and apply the principles of culturally responsive assessment practices.
  - Resources that explicitly connect cultural responsiveness to the triangulation of assessment evidence so that observational and conversational assessment data are viewed with equal value to product-based assessment data.
  - Training on the 6 threads of inclusive design.
  - Schools may need funding to ensure that physical health and wellbeing programs for students are fully accessible - this will allow schools to purchase equipment that supports individual engagement in physical activity
- Are there any legislative/regulatory barriers to implement the recommendations?
  - We may need a requirement for publishers and suppliers of resources and instructional materials (including both print and digital) to ensure accessible options exist so that all students may participate meaningfully.
  - If procurement procedures are established for boards, but no parallel requirement is issued for publishers and suppliers, this may compromise the ability of school boards to acquire learning materials that are accessible and culturally responsive/relevant. Where accountability is left up to individual vendors, they may put profits ahead of accessibility.
  - Growing Success (the provincial assessment and evaluation policy) uses the term "professional judgement" 15 times without a clear definition of what professional judgment means -- a more clear definition which explicitly includes barrier-free assessments for students with disabilities as well as ensuring assessment that is culturally responsive and relevant provides boards will help boards ensure compliance with the recommendations.

Section Four

- Delivery of assistive technology training needs to be maintained and updated frequently, not just a one off. As we have all learned this year things change quickly in technology and it is easy to become outdated. All staff or at least all who work with students who use assistive technology need ongoing training. As well more information and training on Universal Learning Design for all staff. Lack of funding is the critical barrier to implementing these operational priorities.
- School boards are well-funded through the SEA to provide appropriate technology and training for educators. At the district level, having staff use PPM 159 (Collaborative Professionalism) as a reason on why not having to implement technology as well as pedagogical practices even when trained.

- Time, funding, and the ability to find dedicated personnel to work on implementation. Also, we need centralization for available technology platforms, etc.
- We believe in the importance of making digital resources fully accessible to students and staff with disabilities. We continue to work on making all information that our board produces accessible in a variety of formats and we are continuing to make this a focus moving forward. There are many individuals who put information up on our board website and our school websites so managing content can be challenging. We continue to demonstrate our progress through our annual accessibility report. Funding from the Ministry specific to designating a digital accessibility lead would be helpful, even if for the initial implantation of this role.
- (Recommendation) 34 - ensure this position is funded
- What resources do school boards need to implement the recommendations in the section?
  - Regarding centrally provided tools (such as VLE), centrally provided supports and guidance on creating accessible content and coordination with vendors to ensure that their platform makes this as easy as possible for staff.
  - Additional resources for staffing to support creation and maintenance of accessible web and digital content
  - Multiple departments involved in this work (Comms, ITS, H&S, LSS) and would be challenged to support this work sufficiently currently
- Are there any legislative/regulatory barriers to implement the recommendations?
  - If procurement procedures are established for boards, but no parallel requirement is issued for digital learning suppliers, this may compromise the ability of school boards to acquire learning materials that are accessible and culturally responsive/relevant. Where accountability is left up to individual vendors, they may put profits ahead of accessibility
  - 35.11 seems more a requirement for publishers rather than school boards
- Are there any local operational issues to implementing the barriers?
  - Staffing
  - Large number of web properties presents a challenge with ensuring accessibility standards are met with existing content, and continue to be met with future content
  - Large number of content creators across organization means lots of people to train on creation of accessible content

Section Five

- Funding is a key barrier for the following areas: transition navigators that can take the time needed to make community connections, keep updated about local opportunities and services and do in depth transition planning with families so that these students can graduate to a concrete plan that meets their individual needs. This includes

transportation and support for students with higher needs are available so they can also access cooperative education/work experience. 1:1 job support for students with developmental disabilities and high medical needs that are planning to transition to paid employment. Resources for students with developmental disabilities and high medical needs or ensure they have an equitable system as well. Operational challenges regarding transition navigators will be to manage the multiple complexities of transition for students with developmental disabilities/complex needs on top of the rest of the system. Students with developmental disabilities do not have the same access to counselors who can advise on specifics. They could go to their counsellor but their counsellor will not know what options are available. These students would benefit from a centralized guidance counsellor/transition navigator to help them and their families with navigating this complex system.

- Resources: (our board) has developed videos to support parent/guardian understanding of the key pillars of spec ed: IEP, IPRC and Transitions. However, would be great for EDU to develop videos similar to the ones created by Alberta Education. The biggest challenge is misinformation on segregated settings- self-contained classes as providing individualized programming. Another challenge for school boards are the medical practitioners and other regulated health professionals recommending placements (self-contained classes), telling parents to ask for a dedicated EA as well as other things. Once again, legislation allowing students with disabilities to be segregated into self-contained classes leads to transition plans and programming that do not promote paid employment for all young people with disabilities. Promotion of the benefits of employing people with disabilities should be promoted at the federal and provincial level - an ongoing media campaign in necessary. Teacher unions want staff to be released to complete IEPs, attend IPRC and transition meetings. This work should be an expectation of employment in school boards.

- Again, are great ideas, but the logistical barriers here are immense. In the abstract, who wouldn't like improved collaboration between boards, agencies and ministries, but in practice, there are different philosophies, mandates, interpretations, etc. that all stand in the way from time to time.. Unless there is consolidation and/or direction from the Ministry level, these will not be attainable at local levels. There is also the consideration as to who makes the determination as to what supports, plans etc are necessary, as opinions often differ between organizations and/or individuals. Some of the recommendations also ignore the reality that there are competing priorities that must be addressed (e.g. exclusions re: right to education vs. health and safety)

- We believe that our board does an exceptional job of transitioning students identified with high needs into school and between schools. We hold over two thousand transition meetings a year for a board with 37,000 students. Parents are provided with notes from Transition Meetings. We will continue to refine and hone our transition process as needed but welcome input. We continue to work on having all information in our Board in accessible formats. This is a struggle in our current environment due to our

responsiveness to our COVID environment. In our Board, when a student is placed on a modified day, a plan has to be submitted to the area Superintendent to transition the student to a full day in a timely manner.

- Inter-Ministry Collaboration - Agree with the recommendations in this section. This vision has been in place for a long time. Schools have the greatest access to students (5 days a week 10 months of the year). Many school facilities are not yet set up to support appropriate and respectful spaces for meaningful collaboration and service delivery. We need funding to support facility projects with the outcome of increased collaboration with partners. These spaces could be used during the school day and after hours through community use. We need appropriate rooms for clinical teams, parent meetings, etc. So much need for professional learning and training - funding needed. The number of PA Days we have is not sufficient to do this work within the timeframes suggested throughout the recommendations. More PA Days? (Recommendation) 46 - teacher and administrator professional judgement needs to play a part in determining whether an IEP is required or not. (Recommendations) 47/48 - funding to staff this process. The work of special education should be focused on students rather than paperwork and red tape. Section about IEPs and Student/Parent Participation - Perhaps an appropriate place to document some of these pieces would be through an update to the guidelines for Board's Special Education Plans (Special Education in Ontario Part B) to ensure details are publicly available. Data Collection - funding to ensure our student information / Human Resources / data and research systems are set up to pull relevant reports.
- We support the recommendation. Resource intensive recommendations will require additional investments.
- Recommend that every school board should have a Human Rights Policy to ensure that students with a disability shall have access to and receive any programs and services, including special education or other disability-related services or supports that they require, in accordance with the Ontario Human Rights Code on the duty to accommodate persons with disabilities.
- Government of Ontario should develop an accountability framework and share with the MOE and School Boards to ensure and demonstrate that the needs of students are being met.
- School Boards/MOE establish a Policy/Procedure/Practices Review Guide to provide a lens to ensure that these are established and actioned in accordance with the AODA, CCRF and OHRC.
- Supportive of the IPRC Recommendations and providing an overhaul of the current process and a review of the current exceptionalities.
- The current IPRC process promotes a deficit model and was established at a different time in education
- Support for the IEP recommendations. Constant communication between teachers and parents/caregivers in implementing students' IEPs through a collaborative process.

- IEPs expectations need to be reviewed and revised moving to a strength-based approach.
- The current IEP model and its implementation, is too focussed on a student's needs to develop accommodations rather than focusing on the strengths as the foundation for accommodations in an effort build skills to eliminate the need.
- The Education Act allows Administrators to use their "discretion" as it pertains to expulsions and suspension. More training on what "discretion" entails, from a human rights perspective, should be offered and a criteria developed.
- An Exclusion Appeal process should be developed and implemented in every school board, with well developed expectations to best support students and families.
- Accessibility Plans should be shared publicly on websites with opportunities for the public to make comments and provide feedback in an ongoing way.
- Support for the idea of an Accessibility Lead who would support plan implementation, development and delivery of professional development, community liaison, member of SEAC, chair Accessibility Committee, establish networking groups for students and staff with disabilities, work with HR on a recruitment and hiring strategy, etc.
- Would need a dedicated staff person (Accessibility Lead) to offer development of advocacy skills for parents and students with disabilities, otherwise, staff resources will be a barrier to this sort of work.

Section Six

- Funding to support Cooperative Learning (large evidence base) to ensure students with disabilities are included alongside peers in the learning environment. Again, change range of placement options (most separate boards in Ontario do not allow students with disabilities to be placed in segregated settings/self-contained classrooms. Legislation regarding placement has not changed since its inception in 1980. It needs to be reviewed by a third party (excluding OHRC) using a Human Rights approach. Doug Willms monograph on engagement should be at the forefront of supporting social and other forms of engagement for students with disabilities and their peers. Social inclusion and full participation can only happen if the range of placement options allowed by legislation are change to allow with provinces such as New Brunswick, British Columbia, and Alberta. Othering of students will continue if beliefs around disability persist. Student voice of all young people with disabilities should be heard, honoured and acted on. Awareness by educators that students with disabilities want to be included with their age-appropriate peers. Bullying of students with disabilities is disproportionately higher than their peers as noted by the Canadian Human Right Commission. Student Trustees in all district school boards should be representative of the disability community including those with intellectual disabilities.

- (Recommendation) 58 - funding for this position. Transportation - training for drivers requires funding, turnover of drivers may cause additional training needs. (Recommendation) 67 - funding for staff. Many schools are already supporting students socially at recess; however more staff (perhaps itinerant staff, shared between schools) would permit a more robust program opportunity. Service Animals Data - funding to improve student information systems to track necessary documentation and data.
- We support these recommendations. Consideration for sharing a Navigator role. Will require additional Ministry investments to fulfil these recommendations.
- What resources do school boards need to implement the recommendations in the section?
  - Funding programs that allow schools (as sites that host events pertaining to social realms) the ability to be fully accessible to staff, students and families
  - Requirements for transportation companies to have a minimum number of accessible buses to transport students -- and to have these at the same cost as normative buses.
  - Better understanding of competing rights as it relates to service animals in schools and other Code protected grounds
- Are there any legislative/regulatory barriers to implement the recommendations?
  - Where the trainers of service animals may want to come into the school environment for extended periods of time to support the inclusion of students with disabilities, they will also need to have a criminal record check with a vulnerable sector screening.
- Are there any local operational issues to implementing the barriers?
  - It is often difficult to find students placements in cooperative education programs -- to additionally have to monitor the accessibility of such placements would limit the pool of opportunities for all students. In addition, what agency/leverage do school boards have to pressure external employment partners to make their workplaces more accessible?

Section Seven

- Good ideas, requiring a huge influx of funding and resources. The reality is that many boards also face aging infrastructure and don't really have the resources to replace these buildings.
- To ensure fully accessible built environments, the ministry should have requirements for boards around new builds and also increase funding for new builds so that boards are provided with adequate funding to include all accessibility features.
- Training for facilities and maintenance on accessibility required, as well as funding dedicated to projects focused on these goals.

- Support the recommendation. Our Accessibility Advisory Committee conduct Accessibility Audits and provide recommendation for improvement in four to six schools per year.
- What resources do school boards need to implement the recommendations in the section?
    - Additional designated capital and non-capital funding beyond School Renewal Allocation and operating budgets beginning in January 2022.
    - The Ministry needs to adjust the current funding model for new schools and major additions to appropriately reflect additional funding to implement standards at time of build.
    - Staff resources to do gap assessment for all schools and board buildings against mandatory standards.
    - Clear definition of standards, such as a Guide that outlines in detail and provides examples/pictures, we should not have to interpret and reinvent everything from scratch for every recommendation.
    - Architects, Engineers and other consultants trained and well-versed in these accessibility recommendations and standards as well as how to apply them.
    - Additional facilities staff to implement projects (project managers, admin support, supervisor support).
    - Training for existing staff to fully understand accessibility needs, solutions and implementations.
    - Additional System Administrator to support Organizational Change and support P/VP, parents, students.
    - Additional communications staff support.
    - Needs to be five-year implementation window or some type of prioritized phased approach over the next five to 10 years, cannot be required for 2025
    - Building and site sizes may need to be increased to be able to accommodate the additional space requirements of these recommendations.
- Are there any legislative/regulatory barriers to implement the recommendations?
    - SCI funding not eligible for accessibility projects at this point.
    - Last VFA audit included some information gathering but did not assign dollar values.
    - Technical Standards and Safety Act, 2000, does not currently allow for independent movement throughout a building by requiring some devices be operated by a second individual.
    - A clear end goal needs to be defined and actively updated. The *Accessibility for Ontarians with Disabilities Act*, 2005 defined a concept to make buildings accessible by 2025, when a precise definition of what is required for a building to be classified as accessible was required.
    - City and Regional bylaws and Planning department standards may need to be changed to align with these recommendations.

- Are there any local operational issues to implementing the barriers?
  - Playground equipment is currently funded through fundraising at individual sites.
  - Parents adapting to site changes to support accessibility.
  - Adaptation of changes in job requirements by labour unions.
  - Building site selection standards would need to be changed to better align with needs identified by these recommendations.
  - Custodial products use and application would need to be changed to better align with recommendation, due to issues like glare and traction.

Section Eight

- There are many good ideas in here, but again, a massive influx of time, funding and resources would be required.
- (Recommendations) 144-149 - funding for dedicated staff, funding for training, funding for innovation. (Recommendation) 182 - the principal is responsible for implementing the IEP. Unsure how the principal can assume responsibility for partner involvement unless it is limited to making a referral. The reality is that waitlists exist in many communities.
- We support the development of a ministry emergency plan.
- When developing the plan it will be important to review and reflect on the pandemic and include best practices that all school boards could benefit from.
- Keeping students with disabilities at the forefront of the plan at both the ministry level and in school boards will be critical to avoid past wrongdoings and allow for the greatest success.
- Reaffirm the importance of student voice and lived experiences when developing the plan with a real focus on implementation.
- To allow for accessible learning (technology) ensure all school boards have the necessary infrastructure to allow all students to access learning or the plans will not be able to be implemented.
- Ensuring plans are in place and include mental health supports that School Mental Health Ontario develops.

Section Nine

- The Ministry of Education should create a portal to track school board progress and fund a literature review on the effectiveness of self-contained classes (this is beyond the scope of the standards but is interwoven throughout the standards. Locally, adequate staffing and funding will be an issue.
- Sadly, I'm not sure that the timelines in the document are in any way realistic. Attaining all of the recommendations would require a massive influx of funding, training, and resources from the Ministry level.

- Many Boards have just completed and submitted their AODA five-year plan. How will this be considered?
- It would be helpful to establish a provincial network of school board Accessibility Leads, once established, for the sharing of ideas, resources, etc.
- Any reporting mechanisms should be user friendly and easy to complete, and not onerous.

Section Ten

- Ensure that *Special Education in Ontario* and other documents from the Ministry of Education include comments that students are involved in their transition planning throughout their career (and remove the notion 'where possible').
- As a board, we believe that we are consistent in our expectations around our transition meetings. We have eight Special Education Coordinators who provide over 2,000 transition meetings annually. Notes are provided to parents/guardians. We think that we could collaborate more with our post-secondary partners to provide better transition experiences and this will be an ongoing goal.
- What resources do school boards need to implement the recommendations in the section?
  - The province would want to create and accurately monitor a contact list of offices and individuals at postsecondary institutions who focus on accessibility services. This would help students, families, and transition navigators to have timely access to the resources and services they need to make good decisions about post-secondary pathways
  - Where students need access to transportation to and from cooperative education placements as well as support staff at their placements, the province will need to provide funding for this transportation and support above what is already provided.
- Are there any local operational issues to implementing the barriers?
  - Where school boards create transition navigator positions to assist students with disabilities in transitioning students to post-secondary, the need for these individuals to know, access, and understand supports and accommodations available within institutions and programs has the potential to be overwhelming without creating some alignment in programs/services in those institutions.
  - Some consistency in the formal professional assessment or report requirements post-secondary institutions have for potential students to access supports would prevent students from having to meet the potential multiple needs of institutions.