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**Easter Seals Ontario Submission to the Public Consultation on Education Accessibility Standard Development Committee Kindergarten to Grade 12 Initial Recommendations**

November 1, 2021

Easter Seals Ontario consulted with families of students with physical disabilities, students with physical disabilities and Special Education Advisory Committee (SEAC) members who represent Easter Seals on 24 school boards.

Easter Seals Ontario supports 4,500 children and youth with physical disabilities by providing assistance with the cost of essential mobility and accessibility equipment and fully accessible camp programs. In addition, Easter Seal supports students with physical disabilities by providing post-secondary scholarships. Easter Seals is a recognized voice for children, youth and young adults with physical disabilities and advocates at the provincial level for improved accessibility in homes, schools, and the community.

Easter Seals strongly supports the development of Education Accessibility Standards that can increase education accessibility for students with physical disabilities. As one parent said:

“This is critical!! My son has struggled with too many discriminatory barriers that leave him feeling like a second-class citizen. It is intolerable.” Parent Survey comment

**Prioritization of Recommendations**

The Education Accessibility Standard Development Committee Kindergarten to Grade 12 (SDC) Initial Recommendations are ambitious and comprehensive, covering almost every issue that parents have expressed concerns about and many they hadn’t considered. All the issues identified resonated with families of students with physical disabilities and must be addressed to improve accessibility to education. These are real issues that are negatively impacting students every day.

“Desks are not wheelchair accessible. Special ones must be ordered and take a long time (over a year) to arrive. Dragon software should be available to all kids who have difficulties typing. Not all chapter books were offered online to use read and write and does not work on iPads at all. When voice to text software is needed Google read and write is not as effective as the Dragon software. School buses are not wheelchair friendly. Even if the child transfers to a seat there is no where to store the chair. Kids have to travel on Wheel-Trans separate from their peers, or their parents have to drive them. You should be able to book a modified school bus so the kids can travel with their friends.” Parent Survey comment

The parents and SEAC members that reviewed this document expressed concern that there may be insufficient time to achieve all the important changes by 2025. All the recommendations are important and to ensure that the overwhelming number of recommendations does not become a further barrier:

1. **Easter Seals Ontario recommends prioritizing issues to address both the most significant issues, as well as those items that can be quickly implemented.**

**General Recommendations**

Easter Seals Ontario supports the key concepts that are included throughout the document including:

“Nothing about us without us” The inclusion of people with disabilities, including students and their parent/guardians, in all levels of accessibility planning, development, monitoring and accountability is critical in making sure that accessibility improvements meet the needs of students with disabilities.” Parent Survey comment

Other parents also made the same point:

“You cannot fully understand disability until you have experienced it, either yourself or through your child's struggles.” Parent Survey comment

“It is SO important to include the parent perspective!! We live this every day and while educators are experts in many ways - unless they live this life, they simply don't know enough without consulting us!” Parent Survey comment

1. **Easter Seals Ontario recommends that all recommendations that involve accessibility planning, development, monitoring and accountability should be consistent in the language and terminology regarding the participation of people with disabilities, including students and their parent/guardians.**

The Ministry of Education has responsibility for the development of regulations, policies, procedures and resources to support school boards in making sure that education is accessible for students with disabilities.

1. **Easter Seals Ontario recommends that all the SDC recommendations that pertain to the Ministry of Education should be clear and consistent about the Ministry role in providing leadership in creating a provincial framework and culture to support accessibility improvements and accountability. Whether the recommendation concerns physical and architectural barriers or organizational barriers, the Ministry must provide policy direction, funding, and implementation resources, as well as an accountability framework to ensure that education accessibility for students with disabilities is achieved.**

The document has a strong emphasis on professional development about accessibility, the duty to accommodate and how to provide effective instruction and assessment. Professional development both during pre-service and regular in-service for teachers, administrators, and educational assistants can be effective in improving the outcomes for students with disabilities.

1. **Easter Seals Ontario recommends that all the recommendations about professional development be consolidated to identify the full range of topics, including attitude and behaviour, curriculum, instruction and assessment, social realms, and parent/guardian support, and make it clear:**
	* **how and what professional development materials and resources will be developed**
	* **how people with disabilities, including students with disabilities and their parent/guardians, will participate in planning, delivery, and accountability**
	* **who is responsible for the delivery and assessment of education and training programs, and,**
	* **what accountability measures will be used to measure changes in knowledge and practice.**

There are recommendations about the curriculum throughout the document that would improve accessibility and ensure a disability lens is used in curriculum development.

1. **Easter Seals Ontario recommends that all the recommendations about curriculum should be consolidated to ensure that the Ontario Curriculum is accessible to students with disabilities and includes the perspective and lived experiences of people with disabilities, including students and their parent/guardians.**

The report includes recommendations about the importance of Universal Design for Learning (UDL) but did not explicitly include Differentiated Instruction (DI). DI is an effective method for meeting the needs of diverse learners.

1. **Easter Seals Ontario recommends that Differentiated Instruction be made explicit as a strategy to meet the some of the needs of students with disabilities.**

The SDC recommendation include significant efforts to address issues of accountability, including identifying timelines and measure of compliance. Accountability is a challenging and complex issue for government initiatives when there are multiple provincial Ministries and levels of government involved. The term “ensure” has been used in many of the recommendations without clear descriptions of outcomes and measures of achievement.

1. **Easter Seals recommends that all recommendations that include the term “ensure” should include a clear description of anticipated outcomes and accountability measures to demonstrate achievement of those outcomes.**

Accountability recommendations highlight the importance of implementation and outcome measurement, result analysis and public reporting. However, there is inconsistency in the accountability expectations and not all accountability recommendations include clarity about:

* what will be measured,
* who will do the measurement,
* what are the expected outcomes,
* how the information will be analysed,
* how the measurement information will be reported,
* to whom it will be reported and how frequently, and
* how it will be publicly reported and what information will be included (analysis, trends, etc.).
1. **Easter Seals Ontario recommends that all accountability recommendations be revised to ensure consistency of language and inclusion of all the elements described above.**

All school boards in Ontario have a Special Education Advisory Committee (SEAC) that includes representatives of local associations affiliated with provincial associations that represent the interests of exceptional students. In the report there are some recommendations that include SEAC in the planning, monitoring or review of the actions to improve accessibility:

1. **Easter Seals Ontario recommends that all of the initial recommendations be reviewed to identify if SEAC should be involved in the planning, monitoring or review of actions to improve accessibility. Further, public reporting of measures to improve accessibility and progress to goals and timelines should be shared with SEAC regularly and at a minimum annually.**

The SDC has included timelines to create a sense of urgency and targets for the completion of recommendation activities. This is a great step forward but there also needs to be enforceable compliance measures with consequences for failure to complete actions. A culture of continuous quality improvement is required that would celebrate success and provide incentives to achieve milestones, as well as penalties when there is limited or no progress without clear cause.

1. **Easter Seals Ontario recommends that the SDC review the initial recommendations and timelines and add compliance measures or milestones that can be used to measure progress. There should also be mechanisms to enforce compliance and make sure there are consequences for failure to implement changes in the required timelines.**

There are a number of recommendations in the report that will involve the participation of other ministries, or organizations funded by other ministries, and it is important that there be clarity in the expectations and scope about the role and responsibility of other ministries.

1. **Easter Seals Ontario recommends that all recommendations that impact other ministries or organizations be consolidated to ensure consistency of language and terminology and make it clear what is expected of each organization to support accessibility for students with disabilities.**

Several recommendations reference the need develop repositories or hubs for the collection of resources to enhance accessibility, support professional development or create accessible materials in multiple formats. The sharing of common resources would support all 72 school boards and save individuals boards the time to create all of their own resources.

1. **Easter Seals Ontario recommends that this approach should be followed and led by the Ministry of Education. The Ministry is in the best positions to support the development of information hubs or repositories that can be accessed by all school boards.**

There is an underlying message about the importance, to students and their parent/guardians, of consistency in policies, programs and services across the province. While there may be legitimate reasons for local refinements or differences, students and their families should have confidence that they are receiving an equitable education wherever they live in the province.

1. **Easter Seals Ontario recommends that the goal of equitable and consistent educational programs and services for students with disabilities be made explicit within the report. This could be achieved through a strong statement within the new education accessibility standards.**

Easter Seals Ontario appreciates consideration of these recommendations by the Education Accessibility Standard Development Committee Kindergarten to Grade 12. Additional feedback on specific recommendations is included in Appendix A.

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**Appendix A: Feedback on Individual Recommendations**

1. **Attitudes, Behaviours, Perceptions and Assumptions**

Easter Seals Ontario agrees that attitudes, perceptions, and assumptions are one of the most significant barriers that students with disabilities face. Ableism is entrenched in society and the usual perspective is that students with disabilities, or special education students, are a deviation form the norm. This attitude has led in the past to exclusion from education and continues with congregation of students, and failure to accommodate students in the “regular classroom”.

Changing attitudes and behaviours is very difficult and will take time. However, it is an important first step to improving accessibility to education for students with disabilities. Easter Seals supports the recommendations as important steps to shifting attitudes.

“These recommendations are very welcome and long overdue. Our experience thus far has shown us the important role principals play in fostering, encouraging, and implementing fully inclusive school environments.” Parent survey comment.

The responsibility for change lies not only with the educators but with all individuals in the education system. Shifting attitudes requires a culture change that needs to be led from the top by Trustees and senior administration. Some of the steps to improved accessibility include:

* Recognizing the diversity of students in every classroom
* Understanding the inter-sectionality of disability with other characteristics such as racism and poverty
* Presuming student competence
* Holding high expectations for every student
* Personalization or individualized accommodations and supports for each student

“The school system has a long way to go. It all begins with attitudinal and knowledge-based barriers. The more we can help focus on UDL for ALL learners and presuming competence for ALL learners, the more inclusive schools will become.” Parent survey comment.

The development of strategies and education programs to change attitudes and behaviors must include people with disabilities, including students with disabilities and their parent/guardians, at the planning, development, and delivery stages.

# 3.1 Easter Seals families raised concern with the language used in terms of collaboration with parents and students:

“I'm uncomfortable with the wording "Deal with parents and students". -- Suggest maybe

"Engage with...?" One DEALs with problems, one engages with people, so this language is skewed able-ist.” Parent survey comment.

1. **Awareness and Training**

Easter Seals Ontario recognizes the importance of providing training about the Human Rights Code, Duty to Accommodate, and how to support students with disabilities in the classroom are critical to improving accessibility.

“Yes. I agree that all graduating teachers should have received at least basic training in

accommodation techniques etc. and that talented young teachers should be scouted/recruited for intense Spec Ed specialization as, in my view, the need for this expertise will escalate in the coming years and not having the tools to educate children with differences will be a lost opportunity and an expensive one for our civil society.” Parent survey comment.

“From the legislative mandate to the many accommodations available. The old teachers who did not get it should go back to school and have to be mandated to take the course. The course must be though from a disability perspective by disabled people.” Parent survey comment.

Easter Seals Ontario supports the awareness and training recommendations and would promote enhanced mandated training:

* During pre-service for teachers, educational assistants and other staff who support students at school
* For all educators on a regular basis throughout their career

In addition, Additional Qualifications (AQ) in special education should be mandated to all teachers and administrators.

“What about ECE who work with students with disabilities? More training needs to be done with teachers on how to respect, collaborate and work together with the EAs in their classrooms who are often doing the hands-on support with children with disabilities in the classroom.” Parent survey comment.

The initial recommendations in this section should be linked with all of the recommendations throughout the report that identify topics and types of training for educators. It would improve the education accessibility standard if all the training expectations were consolidated to reduce duplication and strengthen the importance of training.

Recommendation specific comments:

# 6 - “The word "disabled" incorporates such a HUGE swath of people with such varying differences, types, permanence or impermanence, degrees etc. of ability that any such training needs to factor in opportunities for feedback. The disabled world is not one-size-fits-all so a forum for educators to share strategies and experiences and solutions is essential - maybe a blog/FB page?” Parent survey comment.

# 8.1 – “All learners (able and disabled people) are relying more and more on tech. The level of

competence among educators varies enormously. Remediation here can benefit ALL

educators, not just those who work with student with differences. This knowledge gap among teachers has been woefully apparent to us throughout our contact with the TDSB. The Min of Ed needs to ensure that teachers are on the leading edge of this reality of the 21st century. They are preparing students for the future and need to be early adapters.” Parent survey comment.

1. **Curriculum, Assessment and Instruction**

Easter Seals Ontario supports all of the recommendations to improve the accessibility of the curriculum, instruction and assessment, and most importantly, the inclusion of people with disabilities and their stories in curriculum materials.

The review and development of curriculum should include people with disabilities, including students with disabilities and their parent/guardians at every stage.

Easter Seals Ontario strongly supports the importance of experiential learning and co-op education for students with physical disabilities, who are often excluded from activities and frequently leave secondary school without any pre-employment knowledge or skills. The provision of accommodations, including one to one support and transportation, is critical to increasing student readiness for increased independence and employment.

1. **Digital Learning and Technology**

Easter Seals strongly supports the need for digital learning and technology recommendations to improve the accessibility of education for students with disabilities. Students with physical disabilities face many challenges in accessing education in the classroom and learning remotely in the pandemic has created many new challenges. The recommendations in this section will improve access to education, however, all the recommendations need to have clear and measurable actions with compliance measures that have an enforcement mechanism.

Easter Seals families support the need for consistency of digital technology, planning, training and learning, but can’t lose sight of the need for personalization for students with disabilities, who may sometimes require specialized technology that is individualized to the student’s needs.

Easter Seals Ontario supports the need for consistent technology platforms and digital learning resources across all school boards. However, it is important to recognize that not all communities have the same internet services and reliability. There is a need within the new standards to recognize the challenges and the need for local solutions in providing digital learning to students with disabilities.

#32 – As per Easter Seals Ontario’s Recommendation 2, all planning and training activities should be informed by people with disabilities, as well as students with disabilities and their parent/guardians.

“It seems that the decisions are made (by) people who have no understanding of disabilities. This would be a refreshing change to have those who live/live with it actually have a say.” Parent Survey comment

“It is always best to hear from people that experience disability so that it actually meets their needs.” Parent Survey comment

# 33 – This recommendation lacks specificity of actions required and has no details on what measures will be used to measure change and ensure compliance.

# 34 Easter Seals families support the concept of having a digital lead but recognize that there needs to additional staff throughout the school board to deal with day-to-day technology issues. Comments included:

“A lead person at the school board and a lead for EACH of the areas will better assist needs at the school level as they arise by reducing wait times. Having a lead in each area can also promote more meaningful and interactive workshops, rather than just a download of information on educators and student.” Parent Survey comment

“It's key to have a centralized person responsible for the well-functioning of the devices and available in-person to discuss modifications and needs of students.” Parent Survey comment

#35 – Easter Seals families support the need for an “Action Plan” to measure progress and identify important milestones in the multi-year plans for digital learning and technology.

**Easter Seals Ontario recommends that the digital learning and technology plan be included, or linked, to the school board Special Education Plan and that the Special Education Advisory Committee (SEAC) be included in the development, annual review, and monitoring of the action plan. SEAC is a mandated committee that can provide advice on the improvements and challenges to digital learning for students with disabilities.**

#35.11 Easter Seals families recognize the importance of digital textbooks that are compatible with the technology being used by the student.

“Not all chapter books were offered online to use (work with) Read and Write and does not work on iPads at all. When voice to text software is needed Google Read and Write is not as effective as the Dragon software.” Parent Survey comment

#36 Easter Seals families strongly support the need for additional permanent funding to support the digital learning and technology strategy. Technology is changing rapidly, and students need access the best and most appropriate technology from well training educators. Increased funding for Special Equipment Amount grants should also be allocated.

# 37 – Easter Seals families fully support efforts to improve the quality and expectations for digital training of all staff, including educational assistants, who support students with disabilities. Easter Seals recommends a strengthening of the language of the recommendation and should require/mandate digital training for educators in pre-service and regularly through the career of each educator.

“Educators and students will require training and interactive workshops so that these

technologies and programs can be used to their fullest extent.” Parent Survey comment

“I agree that they need training but it’s usually the parents showing them how to use technology that their child uses. Also, right now a therapist from the board needs to sign off on training and sometimes it can take years before a teacher and staff actually use the i.e., a speech device for communication for the student due to said lack of training. There needs to be an urgency to access and utilize all technology by all staff being trained.” Parent Survey comment

“The greatest digital barriers are the teachers themselves who are outdated and do not know how to implement technology in the classroom.” Parent Survey comment

“Expectation or requirement? My child has had assistive tech under-utilized or even unused at times because staff doesn’t understand, know how to use and doesn’t have time to learn how to use.” Parent Survey comment

1. **Organizational Barriers**

**Inter-Ministry Collaboration: to ensure** **students with disabilities receive the support they need from other ministry funded services at school recommendations**

The recommendations in this section are very important to Easter Seals families. Most students with physical disabilities will require health care services, including rehabilitation services, and some will also require mental health and social service supports. Currently there are gaps in services created when organizations outside of the school board make decisions to eliminate or change their services without full discussion with the school board about the potential impacts on students. For example, there are currently 47,000 children and youth in Ontario waiting for rehabilitation services.

Easter Seals Ontario strongly supports the need for mechanisms to promote inter-Ministry collaboration as well as to resolve issues that arise. The SDC should review the recommendations in this section to identify the “grey” areas about responsibility for services and add clarity about:

* Who is responsible for service provision?
* How to access the services
* How to resolve conflicts at the:
	+ Individual student level
	+ School board to community organization level
	+ Ministry to Ministry level

**Individual Education Plan (IEP)s and Parent and Student Participation in IEPs**

Easter Seals supports all of the IEP recommendations to provide all students with disabilities the right to an IEP and to strengthen parent and student participation in the development, monitoring and review of IEPs. Parent/guardians concerns include:

* Lack of understanding of the IEP and the IEP development process
* Lack of understanding of the role of students and parent/guardians in IEPs
* Need to know how to effectively participate in the IEP process
* Concerns about lack of accountability when the IEP is not implemented as described n the IEP

“Sometimes the wording is confusing in the IEP. We need someone to sit and explain it to us if we have questions.” Parent survey comment

Easter Seals families also raised the concern about the difference between the recognition and implementation of IEPs at secondary school. Students who work with multiple teachers find that the IEP implementation varies between teachers and in some cases is totally ignored. There needs to be distinct accountability measures to ensure the IEP is implemented at the secondary school level. Of particular concern is that staff at secondary schools do not make referrals to access the School Rehabilitation Program offered by Children’s Treatment Centres, which could enhance understanding of student needs and ensure therapy programs and supports fit the secondary school environment and support an accessible education.

Easter Seals families sometimes feel that special education is a two-tiered system with students identified through the Identification, Placement and Review Committee Process (IPRC) having more rights than that of students on an IEP who are not identified. The recommendations about changes to the IEP should be part of the consideration in the process to review the need for IPRCs and any process to replace IPRCs. Parent comments on IEPs:

“The IEPs only work if people follow the plan. Otherwise, it's just another dead tree, ink, and unfulfilled promises.” Parent Survey comment

“Inclusion about physical accessibility on field trips should be made in the IEP. Not everyone has a designated EA and can be left out of trips off site.” Parent Survey comment

# 44 Easter Seals families have raised concerns about how accommodations are determined and what mechanisms will be used to ensure IEP implementation compliance. Many parents are concerned about the failure to implement all of the accommodations identified in the IEP and the current lack of recourse when accommodations are not provided.

Parent concerns about IEP implementation:

“How will it be determined which staff members need to know what accommodations are

required in the IEP? How will it be determined who is responsible to ensure accommodations are actually met i.e., a high school with an elevator which is usually broken? The students who require the elevator can no longer access programming on the second floor. Who is responsible to find a solution?” Parent survey comment.

“I fully agree. However, it is one thing to be able to ensure the IEP includes ALL services and supports and another for these things to actually be provided. The overwhelming shortages in support staff allocated for students with disabilities means the services and support they truly need is never fully met.” Parent survey comment.

“We need to ensure that the teachers that have our children: 1. know they even have an IEP, 2. actually read it, and 3. actually implement it. I’ve been told so many times that they have tons of kids with them, and they don’t have time to read them all. It’s unacceptable!” Parent survey comment.

#47 and # 48 Easter Seals families would like to see stronger compliance measures for IEPs such as formal monitoring reports by the Principal about whether all elements of the IEP have been implemented, and if not, what measures will be taken to address the issue.

# 49 Easter Seals families strongly support the need for a mechanism to resolve disputes about the IEP at the school level. Issues should be addressed quickly using a solution-focused approach. This may require giving more autonomy to Principals to identify and address issues. Parent comments include:

“Suggest the implementation of more interim reporting which could ensure the IEP is being followed regularly before any issues that arise have escalated to a level that makes them acute and difficult to resolve. Time lost can rarely be recovered. Early intervention improves communications and results for students.” Parent survey comment.

Easter Seals families were also clear that when disputes could not be resolved at the school level 3rd party mediation is required to ensure a fair and impartial assessment of the issues and solutions.

“It has to be external in order to balance the power dynamics.” Parent survey comment.

“Teachers and school staff protect each other hence the need of an external agency with knowledge to educate teachers and make them accountable on PROPER implementation.” Parent Survey comment

49.12 - The IEP dispute resolution process must accommodate parent schedules. Many parents of children with disabilities are under significant economic pressure and cannot always easily take time off from work. As one parent said:

“Their economic lives can be much more precarious due to medical appointments and time off for illness than parents of able-bodied children. Further, since disability often leads to failed marriages, arranging times when both parents can be available is further complicated. If this is going to work, the school must defer to the parents' availability.” Parent survey comment.

49.17 – Easter Seals Ontario strongly supports the need to maintain, or even exceed, the same accommodations and levels of supports when a student moves between schools or school boards and maintain IEP supports when changing school or school board. Families also expressed concerns about accountability and who will ensure that consistent supports are available to the student.

“Different school boards and schools may have different programs - who will ensure that the same accommodation is possible and that resources are available to achieve them?” Parent Survey comment

49.18 Easter Seals Ontario strongly supports the provision of system navigators or people to help families navigate the school system. Both paid and unpaid supports, such as peer support programs, can be effective in helping parents to navigate the system and obtain the accommodations and supports that the student with a disability needs. System navigation support is required from school entry to when a youth leaves the school system.

“This is very important. Parents are new to this too and often do not know what is available or what they can ask for.” Parent survey comment.

“The Min of Ed should consider peer-councillors: Parents who are experienced and who perhaps could also have received some Min training (online?), who can offer their support. This is how most parents of childcare with differences learn about programs etc. - it is not through "professionals" but by word of mouth through other parents. Why not leverage this?? Most parents find peer support more timely, helpful, and credible.” Parent survey comment

“A big need for transitions from school at 21 to community services.” Parent survey comment.

**Data Collection**

Easter Seals Ontario strongly supports the need for improved data collection and reporting. Over 50% of students who receive special education programs and services are not formally identified through the IPRC and there is limited information on their needs, accommodations, or the programs and services they require. In addition, information has never been tracked from a disability perspective.

**Accessibility committees and plans recommendations**

Easter Seals Ontario supports the need for improved accessibility planning and the enhanced roles of accessibility committees at the Ministry and school board level.

#52 – Easter Seals Ontario supports the development of an Accessibility Lead with an advisory committee at the Ministry of Education. Changing the culture and attitudes about disability needs to start at the top and having a Lead for accessibility will elevate the need for accessibility to be considered in every action of the Ministry.

Similarly, the addition of an Accessibility Lead at each school board will support an increased awareness of accessibility barriers and the need to take action to remove barriers. Committees at the Ministry and school board level should include the participation of people with disabilities, students with disabilities and their parent/guardians.

“Yes, people with disabilities and their families are very often excluded from any planning. Hugely Imperative!! Disability drives innovation so let's let these awesome individuals have much more say in the matter.” Parent survey comment.

Easter Seals also supports the enhanced content of accessibility plans and the enhanced accountability through public reporting. The public reporting should include the analysis of progress and the identification of plans to address any shortfall of the goals.

**IPRC - Process for a school board identifying and making the placement of student with disabilities recommendations**

#54 & #55 - Easter Seals Ontario supports the review of the IPRC process that includes the participation of people with disabilities. There are challenges with the IPRC process from a student and parent/guardian perspective and it creates a two-tiered system in special education. Easter Seals families raised concerns about:

* inconsistency between school boards regarding IPRC processes
* inconsistency between school board placement options
* a focus of resources on congregated classes rather than supporting student in the regular class

#56 - The current IPRC process should be reviewed and/or revised to include the elements described in this recommendation. The placement process needs to be transparent and easy to understand by families. The dispute mechanism needs to be simple and easy to use and include multiple levels from resolution within the school, at the school board, or through an external mediation process.

**Exclusions/Refusals to admit to school/Reduced school hours Recommendations**

Easter Seals Ontario supports the detailed recommendations to prevent exclusions and ensure the right to a fair exclusion process. The recommendations could be enhanced by a strong focus on prevention strategies, including ensuring that all of the accommodations, programs and services identified in the IEP are implemented and reviewed regularly.

Clear definitions about the terms used as well as modified day and reduced school day would improve the recommendations. The main focus is on full time exclusion from school, but other types of exclusions such as “Will you pick Mohammed up because he is having a bad day?” or “We only have an EA available in the morning, so how about Tristan going home at lunch time?” are more common. Parents may not recognize these as exclusions and agree without understanding the implications.

For students with a physical disability there are other types of exclusions, including being told they can’t attend field trips because there is no accessible transportation, or they can’t attend school because there is no nurse available.

The recommendations need to balance Ministry policy expectations with operational autonomy at the school board level. There also needs to be more clarity about health and safety concerns. They can’t be used as an excuse not to meet a student’s needs or provide accommodations to support their participation at school. There is no excuse for violence, but some students who act out physically may hit another student or staff accidently or it may be a component of their disability. Ultimately, the process must support the student’s successful return to school and continuous monitoring to ensure all of the necessary supports are in place.

1. **Social Realms**

Easter Seals Ontario supports the recommendations in this section. Easter Seals families have expressed concerns about their child’s lack of social activities and friends. Activities that are easy for other students, such as going to a friend’s house, are very difficult due to accessibility barriers in many homes and the discomfort of other student’s parents about having a student with a physical disability in their home. Similarly, many community facilities and businesses are not accessible and meeting to hang out can be very challenging.

The social isolation of students with disabilities have been exacerbated during the COVID-19 pandemic. Student’s who are vulnerable to complications of COVID-19 have spent more time at home than their peers and have become even more isolated in remote learning.

Many students with physical disabilities do not have the same opportunities to join clubs, teams, and extra-curricular activities due to lack of accessibility, personal support, or transportation. These barriers must be addressed, and accommodations provided to ensure that students with physical disabilities have the same opportunities as other students. Clubs, teams, and extra-curricular activities provide important opportunities for socialization and the development of friendships; team participation and the development of teamwork skills; life experience and skill development including effective communication skills and leadership.

1. **Physical And Architectural Barriers**

Easter Seals Ontario supports all the recommendations in this section as they will support accessibility improvements to the built environment. Easter Seals families recognize that the Ontario Building Code is inadequate to meet the needs of students with disabilities and that the development of Accessibility Standards to address physical and architectural barriers is absolutely essential. As one parent commented:

“Most of our daughter's barriers are physical. There is no access to the front the school and she has to go to the back of the school and wait for someone to open a door for her. Accessible parking is across a playground, on the opposite (side) from the main office. Her grade classes are on the third floor, but her class has to be moved to the first floor because there is no bathroom she can use. The playground equipment is inaccessible.” Parent Survey Comment

The most critical component of the education accessibility standards to remove physical and architectural barriers is to require that people with disabilities, including students with disabilities and their parent/guardians, are part of the planning and design process. People with disabilities also need to be involved in auditing school buildings and grounds to identify barriers and potential solutions to remedy the barriers.

#77 – This recommendation would require the Ministry of Education to revise the funding formula for school construction and renovations. This recommendation should be strengthened to say the Ministry of Education should revise the funding formula and provide sufficient funds to make all schools accessible.

Parent comments on external spaces

“I appreciate the need for heated pathways - carrying a child from the accessible parking space to his wheelchair located in the school because we can’t push it through deep snow is dangerous. Also, there is a water drain located at the top of the accessible parking space so when water is draining from the school parking lot and it’s cold, it makes an icy, hazardous ⚠️ combination. I appreciate a covered space to unload - getting a spastic child from a vehicle and loading them into a wheelchair is not an easy or fast task. Add elements of rain or wind and it becomes even more difficult. Delivery vehicles have been often found using accessible parking spaces and parents often block these spaces at our school due to the lack of parking.” Parent survey comment.

“Exterior playgrounds are great for those that can walk. But wheelchair users cannot transfer themselves to the special swings or other equipment. I feel this area needs improvement as accessible has to mean more then just getting in the door. Parent survey comment.

Feedback from families strongly endorsed the need for all entrances and exits to be accessible with power doors that are well maintained. In addition, elevators that can hold more than one wheelchair were identified as an important priority. Parent comments on interior spaces

“All entrances of a school need to be accessible. Make all walkways and entryways flat and reduce use of ramps.” Parent survey comment

“Ensuring EVERY entrance is accessible to the school. Not just the main front doors. There should be clear access into the school without obstacles. This includes a child returning to school from rear yard door - no button to access. Difficult even with assistance.” Parent survey comment

“Too many doors, fire doors in large schools. These make it impossible for disabled students to get around independently because they rarely have the automatic button. I believe the building code only requires one or two automatic door openers in the whole building. This is discriminatory. Also, there is a lack of accessible bathrooms so students with disabilities often have to miss class because they have to wait to use the bathroom. This is also unjust.’ Parent survey comment.

“The biggest challenge I see is exists for emergencies. Most schools and new builds have one accessible entrance/exit. If there is an emergency in that area, the child is now forced to go out a door that is not accessible.” Parent survey comment.

#116 – Easter Seals families are very concerned about the use of “areas of rescue” as part of the evacuation plan. Especially concerned by 116.c that saves room for two wheelchairs and must “ensure those spaces do not block the exit route for those using the stairs.” This discriminates against students with physical disabilities and the emergency evacuation plan should consider use of evacuation chairs and other strategies to evacuate students with disabilities.

Easter Seals Ontario supports the need to implement the recommendations on physical and architectural barriers. Students with physical disabilities are significantly impacted by these barriers that can disrupt their education by preventing them from attending their local school, not being able to enter parts of the school buildings and being at risk during an emergency. Parent comments about the current state of schools:

“More focus should be placed on schools unlawfully excluding disabled students from

homeschools because the schools are not accessible (example - we had to prove that my son could go up and down the stairs to be able to attend his homeschool. The washrooms require going up and down the stairs which is a huge barrier).” Parent survey comment.

“Spaces that have been designated for disabled students are often repurposed. For

example, toilet facilities turned into "temporary:" supply closets. Also, accessible door entries left un-functioning because able bodied kids kick them to open the doors, etc. Maintenance will be critical!” Parent survey comment.

“Elevators need to be bigger to accommodate several wheelchairs at once, especially for safety and emergency purposes, much like the elevators in hospitals.” Parent survey comment

“All these should be considered for ambulatory students as well as students that use manual wheelchairs and need the assistance of two people at times and power wheelchair users. We should include also ceiling lifts and floor lifts in areas when the student needs to be out of their wheelchair.” Parent survey comment.

“Toileting facilities require a lot more space designed from the process perspective.” Parent survey comment.

“There needs to be a private facility so that the student can have diaper changes done, at any age, with dignity. This is very rarely available.” Parent survey comment.

1. **Planning For Emergencies and Safety Framework**

Easter Seals Ontario strongly supports the recommendations for emergency planning and preparedness. The current pandemic has demonstrated how unprepared the education system was for a situation that excluded all students from in-person learning. Many lessons have been learned and there is lots of room for improvement. Students with physical disabilities faced many additional accessibility barriers related to learning at home. Accessibility planning and considerations should be an important part of all emergency planning and preparedness. Parent comments included:

“My child was unable to participate in the remote education at all. They could not watch a screen even for a short time, and eventually I gave up.” Parent survey comment.

“Programs for students with ASD (Autism Spectrum Disorder) were cancelled and I had no help for home learning.” Parent survey comment

“My daughter is 18 and one more lockdown and she will finish school. We can’t keep doing this to her.” Parent survey comment.

1. **Timelines And Accountability**

Easter Seals Ontario strongly supports all of the recommendations in this report, they are all very important and timely implementation is critical. There is some concern that there are a lot of recommendations, and the timelines are very tight. It may be necessary to prioritize some actions for priority completion, and delay others. As the recommendations are implemented, regular re-evaluation of priorities may be necessary.

Accountability is also vital to ensure that the progress on implementation of the new planning and reporting processes is compliant with the recommendations and any new regulations. However, the most important accountability measure is whether these changes are improving accessibility for students with disabilities. Public reporting on progress and the result of removing barriers is critical. Students and people with disabilities must be involved in evaluation processes and their perspective captured in public reporting. As one parent commented:

“Well, it’s a start but all policies are only as good as their implementation. Will there be an inspector to ensure the policies are implemented? What will be the penalty if they are ignored? The disabled community has been made a lot of promises in the past that are hollow, making a mockery of well-intentioned initiatives.” Parent survey comment.