**Development of proposed postsecondary education standards — final recommendations report 2022**

Read the final recommendations from the Postsecondary Education Standards Development Committee. The committee works to ensure publicly funded postsecondary education is more accessible to people with disabilities.

**Letter from the chair to the minister**

Dear Minister,

The Postsecondary Education Standards Development Committee has completed our Final Recommendations Report for the development of proposed Postsecondary Education Standards under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA).

As requested in your mandate letter, and as set out in the *Accessibility for Ontarians with Disabilities Act, 2005*, in this report we have defined the long-term objective of the proposed Postsecondary Education Standards and each of the measures, policies, practices and requirements to be implemented on or before January 1, 2025, as well as the timeframe for their implementation. Our work was informed by the lived experience of people with disabilities, research, the expertise of committee members, as well as the responses to the survey conducted by the Ministry for Seniors and Accessibility, the Ministry of Education, and the Ministry of Colleges and Universities in 2017.

The feedback our committee received on our Initial Recommendations Report provides extensive support for our initial recommendations. Of particular importance was the Ontario Human Rights Commission statement that they were “pleased to see human rights principles and obligations affirmed throughout the committee’s recommendations” and they believe that “if the postsecondary system follows these recommendations, by 2025 colleges and universities will be significantly more accessible, equitable, inclusive and learner-centred.”

Throughout the public feedback process, we heard consistent calls from postsecondary institutions, as well as the Ontario Human Rights Commission, for adequate and stable government funding to support the implementation of new accessibility standards for postsecondary education. We wholeheartedly support this request and have formally included this recommendation in our final report.

While our scope was limited to publicly funded colleges and universities, we propose that the postsecondary education accessibility standards be applied beyond our mandate to include other educational contexts, such as privately funded colleges and universities and transitional job training programs. This will provide continuity and will support students and employees who may be mobile within the postsecondary education system.

Similarly, while we did not receive direction to include Indigenous institutes within the scope of our work, and therefore did not develop these recommendations explicitly with those schools in mind, we heard clearly that Indigenous institutes face common barriers identified in the report. It was also clear the institutes require additional support, including accessibility expertise, resources, and funding. We recommend making the resources created to support publicly funded postsecondary institutions available to all.

Over the course of the more than four years our committee developed these recommendations, we faced a changing global landscape. The COVID-19 pandemic made existing barriers more apparent and provided the opportunity to challenge our assumptions and conventions. The shifts necessary to make education more accessible and welcoming have begun. As schools return to in-person activities, we strongly encourage them not to regress to inaccessible practices with a desire to return to “normal” as “normal” didn’t work for many students with disabilities. We, as a society, must move forward into a post-pandemic world with changed attitudes and behaviours based on what we have learned.

It is our hope that the Ministry for Seniors and Accessibility and the Ministry of Colleges and Universities, as well as postsecondary institutions, begin making changes to remove barriers for students with disabilities before a new regulation is enacted. When this report is posted, I request a letter co-signed by you and Minister Dunlop be sent to the Council of Ontario Universities, and to Colleges Ontario, strongly encouraging them to share the final recommendations with their member institutions, as well as encouraging them to begin addressing existing barriers immediately.

It is essential that the postsecondary education community move away from a deficit model of disability that views disability as a “problem to be fixed.” We need to acknowledge that environmental barriers are erected every day. While it will take time for all the barriers identified in this report to be addressed and embedded into the culture of our institutions, intentional inclusion is a collective responsibility. These recommendations, the existing accessibility standards, and the good work that is already happening at all institutions can move us to a fully accessible education system.

This report is a call to action. We must now collectively act and demonstrate that we can truly live the values and commitments to persons with disabilities embedded in the *Accessibility for Ontarians with Disabilities Act, 2005*. It is necessary to move from intention to action to improve recruitment, retention, graduation and employment rates for students with disabilities. Most importantly, we need to ensure that students with disabilities are welcome, feel a sense of belonging, are valued, heard, and have an opportunity to participate and thrive in all aspects of postsecondary education without barriers.

Finally, I would add on a personal note that it has been one of my greatest honours to chair this committee and work alongside such passionate, thoughtful and dedicated committee members and ministry staff.

Sincerely,

Tina Doyle
Chair of Postsecondary Education Standards Development Committee

**Introduction**

The Ontario government established two Standards Development Committees in 2017, to make recommendations for new accessibility standards for education, in both the Kindergarten to Grade 12 (K-12) and postsecondary education sectors. The Postsecondary Education Standards Development Committee is responsible for making recommendations to remove barriers in Ontario's publicly funded colleges and universities.

In this report, the committee brings forward a comprehensive series of recommendations on what accessibility standards for postsecondary education should include. It is the result of the extensive joint efforts of representatives from the disability community and the education sector to identify the barriers that postsecondary students with disabilities face and the measures needed to remove and prevent them.

**Background**

**Standards development and the *Accessibility for Ontarians with Disabilities Act, 2005***

The [*Accessibility for Ontarians with Disabilities Act, 2005*](https://www.ontario.ca/laws/statute/05a11) (AODA) became law in 2005. Its stated goal is the creation of an accessible Ontario by 2025, through the development, implementation and enforcement of accessibility standards that apply to the public, private and not-for-profit sectors.

With the *Accessibility for Ontarians with Disabilities Act, 2005*, Ontario became the first province in Canada and one of the first jurisdictions in the world to establish a specific law with a goal and timeframe for achieving accessibility. It was also the first jurisdiction to legally require accessibility reporting, and one of the first to establish accessibility standards so that persons with disabilities have increased opportunities to participate in everyday life.

The accessibility standards under the *Accessibility for Ontarians with Disabilities Act, 2005* are laws that businesses and organizations with one or more employees in Ontario must follow so they can identify, remove and prevent barriers faced by persons with disabilities. *Integrated Accessibility Standards Regulation, O. Reg. 191/11*, under the *Accessibility for Ontarians with Disabilities Act, 2005*. Currently, there are five accessibility standards that apply to key areas of day-to-day life for Ontarians. These are:

* information and communications
* employment
* transportation
* design of public spaces
* customer service

The *Accessibility for Ontarians with Disabilities Act, 2005*, requires an independent legislative review every three years to make sure it is working as intended. Both the second and third legislative reviews of the *Accessibility for Ontarians with Disabilities Act, 2005* (conducted in [2014](https://www.ontario.ca/document/legislative-review-accessibility-ontarians-disabilities-act) and [2019](https://www.ontario.ca/page/2019-legislative-review-accessibility-ontarians-disabilities-act-2005), respectively) emphasized the importance of removing accessibility barriers in the area of education and urged government to consider this a priority area.

Before establishing the Postsecondary Education Standards Development Committee, a survey was developed in partnership with the Ministry of Colleges and Universities and the Ministry of Education in 2016. The survey was conducted to inform potential focus areas for new Education Standards. The survey received a total of 2,988 responses. The survey asked respondents to comment on barriers and best practices in five key areas:

1. accessibility awareness and training
2. awareness of accessibility accommodations (policies, processes, programs)
3. information, communication and inclusive decision-making
4. transition planning
5. inclusive and accessible learning spaces

In 2017, two Standards Development Committees were formed to address barriers facing students: one focused on kindergarten through Grade 12, and another focused on postsecondary education. The committees were asked to work in tandem to address barriers across the publicly funded education system in Ontario.

**Mandate of the committee**

The role of the Standards Development Committee (the committee) for postsecondary education is to provide recommendations to address accessibility barriers in publicly funded postsecondary education provided by colleges and universities. These recommendations are intended to inform the government’s work on proposed new accessibility standards for education.

To develop these standards, the committee is required to:

* define the long-range objective of the proposed standards
* determine the measures, policies, practices and requirements to be implemented on or before January 1, 2025, and the timeframe for their implementation
* develop proposed standards that the committee deems advisable for public comment
* make such changes it considers advisable to the proposed accessibility standards based on comments received, and make recommendations to the Minister for Seniors and Accessibility and the Minister of Colleges and Universities

The minister requested that the committee:

* develop recommendations to remove and prevent accessibility barriers in publicly funded colleges and universities in Ontario
* work with the K-12 committee to consider areas of commonality, in particular [transitions (for example, kindergarten to Grade 12 to postsecondary) through a Joint Technical Sub-Committee](https://www.ontario.ca/page/accessible-transitions-students-disabilities-kindergarten-grade-12-k-12-workforce-community)

**Committee membership**

The committee is composed of 20 voting members and two non-voting members representing the Ministry for Seniors and Accessibility and the Ministry of Colleges and Universities. The Ministry for Seniors and Accessibility and Ministry of Colleges and Universities provide information and secretariat support to the committee as it develops its recommendations. The voting members are made up of persons with disabilities or their representatives, members of the postsecondary education sector, students and community organizations. (See [Appendix A](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#section-12) for a list of member names and roles.)

**Public feedback**

This document sets out the committee’s final recommendations for proposed accessibility standards for postsecondary education. As required under the *Accessibility for Ontarians with Disabilities Act, 2005*, the initial report was made available for public comment.

Between June and October, the public was invited to provide feedback on the committee’s initial proposed recommendations, either via email, or by completing an online survey.

In total 283 online surveys were completed, and 29 written submissions were received across both the postsecondary education and disability sectors. Many of the written submissions were on behalf of groups or associations such as the Ontario Human Rights Commission, the Council of Ontario Universities and Colleges Ontario. The Chair also met with student groups and associations representing students with disabilities to seek feedback. Finally, the Chair and ministry met with the Ontario Indigenous Institutes, along with the Ministry of Colleges and Universities.

All recommendations received at least 90% approval from survey respondents, who either agreed with the recommendations as written, or with some changes. The written responses were also highly supportive of the committee’s work, though many flagged the need for additional funding and time to support successful implementation.

Following the public posting period, the committee considered all comments and made a number of changes to the recommendations as a result.

The committee has now submitted its final recommendations for proposed standards to the Minister. As outlined by the *Accessibility for Ontarians with Disabilities Act, 2005*, the Minister may adopt the recommendations in whole, in part, or with modifications.

**Guiding principles**

At the forefront of the committee’s work was consideration of the needs and lived experience of students with disabilities and intersecting identities. The committee embraced the mentality of “nothing about us without us” in all aspects of their work.

The following principles were foundational to the work of the committee in developing their initial recommendations:

* accessibility efforts should be proactive, rather than reactive.
* disability is a critical aspect of diversity and intersectionality. There must be a recognition of intersectionality and the compounded impact of multiple identities. Therefore the principles of equity, diversity, and inclusion underlie all aspects of the committee’s work. Barriers to accessibility and accommodation throughout a student’s academic journey, and at each stage of transition (such as, K-12 to postsecondary, undergrad to graduate, to employment), must be addressed.
* students ought to be able to navigate a system that is transparent and seamless.
* innovation should be celebrated and encouraged.
* there is a shared responsibility for accessibility across all members of an institution.

**Methodology**

The committee began meeting in early 2018. They spent their initial meetings discussing and identifying barriers to accessibility in the postsecondary education sector.

The committee referenced the feedback received in the 2016 accessibility survey conducted by the Ministry for Seniors and Accessibility, the Ministry of Colleges and Universities and the Ministry of Education. The committee sought additional feedback on the challenges faced by students with disabilities as a result of COVID-19.

Throughout the committee’s tenure, a range of barriers came to the forefront based on feedback from the disability community, committee members’ expertise, research, the previous legislative reviews and the Ontario Human Rights Commission. Committee members considered a wide range of barriers upon which to focus their work. As a result of many thoughtful discussions, nine main categories of barriers emerged:

1. general overarching barriers
2. attitudes, behaviours, perceptions and assumptions
3. awareness and training
4. assessment, curriculum and instruction
5. digital learning and technology
6. organizational barriers
7. social realms
8. physical and architectural barriers
9. financial barriers

The work of the committee was paused in April 2018 due to the provincial election. In March 2019, the government announced the resumption of committee work. Meetings between the ministry and the chair began in Spring/Summer 2019 and the committee resumed meeting in November 2019. The committee continued to work and meet in person through early 2020. During the pandemic, meetings took place virtually using Microsoft Teams. Based on the nine agreed upon themes, committee members were divided into corresponding small groups based on expertise and lived experience. The chair asked each small group to draft recommendations to address accessibility barriers from their assigned barrier area. The small groups met independently over the course of several months to develop their recommendations.

Small group teams then brought forward their draft recommendations to the full committee for discussion and review before final voting.

In order to allow for as much meaningful discussion as possible, the majority of the committee’s votes were held electronically. The committee agreed upon a number of definitions for key terms that are used throughout this report. These terms are defined in the Glossary in [Appendix B](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#section-13). The committee members were collaborative, engaged and dedicated throughout the experience of working together in small groups and as a full committee.

**Key resources**

The committee would like to acknowledge the importance of lived experience, professional experience, and consultation with relevant colleagues and stakeholders in developing their recommendations.

The committee utilized a range of resources including the following, which were of significant value:

* [Accessible Campus](http://www.accessiblecampus.ca/), Council of Ontario Universities
* [Assessment of Debt Load and Financial Barriers for Students with disabilities](https://heqco.ca/pub/assessment-of-debt-load-and-financial-barriers-affecting-students-with-disabilities-in-canadian-postsecondary-education-ontario-report/), Higher Education Quality Council of Ontario, 2011
* Disability in Higher Education: A Social Justice Approach, Evans, Nancy J., Broido, Ellen M., Brown, Kirsten, R., and Wilke, Autumn K., 2017
* [Draft Framework for a Post-secondary Education Accessibility Standard](https://www.aodaalliance.org/whats-new/what-barriers-do-students-with-disabilities-face-in-post-secondary-education-in-ontario-send-us-feedback-on-our-draft-framework-for-a-post-secondary-education-accessibility-standard/), Accessibility for Ontarians with Disabilities Act Alliance, 2020
* Enhancing Accessibility in Post-secondary Education Institutions, National Educational Association of Disabled Students
* [Highly Skilled Workforce Expert Panel Report](https://files.ontario.ca/hsw_rev_engaoda_webfinal_july6.pdf), 2016
* [Improving the Accessibility of Remote Higher Education: Lessons from the Pandemic and Recommendations](http://www.heqco.ca/SiteCollectionDocuments/Formatted_Accessibility_FINAL.pdf), Higher Education Quality Council of Ontario, 2020
* [Listening to Ontarians with Disabilities: Report of the Third Review of the *Accessibility for Ontarians with Disabilities Act, 2005* by the Honourable David C. Onley](https://files.ontario.ca/seniors-accessibility-third-review-of-aoda-en-2019.pdf), 2019
* [Policy on Accessible Education for Students with disabilities](http://www.ohrc.on.ca/en/policy-accessible-education-students-disabilities), Ontario Human Rights Commission, 2018
* [Policy Primer: Guide to Developing Human Rights Policies and Procedures](http://www.ohrc.on.ca/en/policy-primer-guide-developing-human-rights-policies-and-procedures), Ontario Human Rights Commission, 2013
* Policy on Ableism and Discrimination, Ontario Human Rights Commission, 2016
* Strategic Diversity Leadership, D. Williams, 2013
* Summary Report of the Disability-Related Support Review, Ministry of Training, Colleges and Universities, 2004
* [Understanding Accessibility in Graduate Education for Students with Disabilities in Canada](https://www.neads.ca/en/about/projects/graduate-taskforce/index.php), National Educational Association of Disabled Students, 2016
* [Universal Design for Learning](http://udlguidelines.cast.org/), CAST
* [We Have Something to Say Report](https://ocaarchives.files.wordpress.com/2019/01/we-have-something-to-say-report-en.pdf), Provincial Advocate for Children and Youth, 2016

**Education joint technical sub-committee**

In order to ensure that the work of both the K-12 and Postsecondary Education committees remained aligned, the Minister for Seniors and Accessibility welcomed both chairs to form a joint technical sub-committee representing members from both sectors and from the disability community. The Education Joint Technical Sub-Committee is made up of nine members from across both committees. The sub-committee is responsible for sharing information across the two committees and for considering areas of commonality, and in particular, considering the [area of transition planning between the two sectors](https://www.ontario.ca/page/accessible-transitions-students-disabilities-kindergarten-grade-12-k-12-workforce-community) as a priority.

[The final proposed recommendations from the technical sub-committee.](https://www.ontario.ca/page/accessible-transitions-students-disabilities-kindergarten-grade-12-k-12-workforce-community)

**Recommendation 1: Long-term objective (non-regulatory)**

With the support of the Ontario government, postsecondary publicly funded colleges and universities in Ontario will implement an ongoing intentional strategy:

* that actively identifies, removes and prevents barriers for students with disabilities from fully participating in, being included in, and benefitting from, all aspects of postsecondary education
* that creates policies, procedures, and guidelines through an intersectional accessibility lens
* that recognizes and responds to the interaction between the environmental features (for example, social, attitudinal, physical, procedural,e tc.) and the features of people with evident (for example, wheelchair user) and less evident disabilities (for example, mental health)
* where teaching and learning practices consider the diversity of learning environments and needs throughout the academic journey
* that recognizes disability is a critical aspect of the education sector’s commitment to human rights, equity, diversity, and inclusion

Realization of the long-term objective will result in all students with disabilities living and learning in an environment where they will:

* feel valued, welcomed and a sense of belonging
* navigate transparent systems without barriers
* be provided with opportunities to realize their full potential both inside and outside of the classroom
* have an equal opportunity to contribute, to learn and to demonstrate their knowledge

**General overarching barriers**

The Honourable David C. Onley, in his [third legislative review (2019)](https://www.ontario.ca/page/2019-legislative-review-accessibility-ontarians-disabilities-act-2005) of the *Accessibility for Ontarians with Disabilities Act, 2005*, noted that Ontarians with disabilities continue to face “soul crushing barriers.” Unfortunately, these barriers are often the result of attitudes that devalue and/or limit the potential of persons with disabilities. It is for this reason that the success of the Postsecondary Education Accessibility Standards is essential.

The following recommendations are intended to support the implementation and future success of the Postsecondary Education Accessibility Standards. Currently, students with disabilities are often considered as an afterthought in the development of policies and budgetary decisions, thus perpetuating the perception that students with disabilities are not valued or heard. To maximize the long-term impact of the standards, it is essential that ministries, and postsecondary institutions, stop working in silos and work together to ensure that the spirit of collaboration and partnership is embedded across the Ontario government and postsecondary sector. Without such a collaborative environment, we risk leaving students with disabilities behind.

**Recommendation 2: Proposed standards (non-regulatory)**

It is recommended that the Minister for Seniors and Accessibility and the Minister of Colleges and Universities co-sign and distribute a memo to all public colleges and universities indicating:

* the final proposed standards are available to review
* the proactive nature of the *Accessibility for Ontarians with Disabilities Act, 2005*, and the institutions’ requirements under it
* the *Accessibility for Ontarians with Disabilities Act, 2005*, covers students with a range of evident (for example, wheelchair user) and non-evident (for example, mental health) disabilities, with intersecting identities
* postsecondary institutions are encouraged to address silos within their structures that will impede the successful roll out of the standard
* strongly recommend institutions implement strategies, whether or not there are standards in place, so as not to delay addressing some of the barriers that can be reduced or eliminated before a new regulation is enacted.

**Recommendation 3: Roll out of recommendations (non-regulatory)**

The committee proposes that the Ontario government use the technical expertise of the Postsecondary Education Standards Development Committee members to clarify intent and technical accuracy during the regulatory drafting stage.

**Recommendation 4: Collaboration between ministries (federal and provincial)**

1. ministries with the Postsecondary Education Accessibility Standards within their mandate shall cooperate, collaborate and hold each other accountable, to ensure its success by engaging in quarterly meetings and report back to the public through their Multi-Year Accessibility Plans
2. the Ontario government shall set up a structural and procedural arrangement to ensure broad communication and partnerships between ministries to support work related to the education sector and students with disabilities and shall report back to the public through their Multi-Year Accessibility Plans on what steps have been taken to achieve this recommendation
3. the Ontario government shall continue to advocate with the federal government through their federal/provincial tables, to ensure both are working towards the same goals of access for students with disabilities and where appropriate, report back to the public through their Multi-Year Accessibility Plans on achievements related to this advocacy

**Timeline:** Within one year of regulation being enacted.

**Recommendation 5: Future initiatives (non-regulatory)**

1. future Ontario government initiatives and strategies aimed at persons with disabilities shall be provided in English and French and proactively consider the needs of students with disabilities and the recommendations of the Postsecondary Education Standards Development Committee.
2. through the structural arrangement noted in [recommendation 4](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec4), the ministry shall ensure when modifying or implementing programs and services for people with disabilities that a review will be conducted to determine if, or how, the program would impact postsecondary students with disabilities, identify further impacts resulting from intersecting identities (for example, low income) and address any barriers identified for students with disabilities. This includes, but is not limited to, programs and targeted funding for Indigenous people with disabilities, the Assistive Devices Program, the Ontario Disability Support Program, and attendant care services.
3. the ministry shall report back to the public through their Multi-Year Accessibility Plans on any reviews conducted and outcomes to address any barriers for postsecondary students with disabilities.

**Timeline:** Within six months of regulation being enacted.

**Recommendation 6: Postsecondary education accessibility standards plain language version**

This Postsecondary Education Accessibility Standards shall in its entirety be produced in a plain language English and French version and in keeping with other standards as they are developed. This plain language version of the standards shall be:

* between 70.0 to 95.0 on the Flesch-Kincaid readability test and use easy-to-understand culturally sensitive images as required
* include video content summarizing the standards with sign language (for example, Ontario Human Rights Commission, Langue des signes Québécoise, the Plains Sign Language), integrated described video and be easy to read
* made available in other languages and alternative formats upon request.

**Timeline:** Within one year of regulation being enacted.

**Recommendation 7: Ministry funding (non-regulatory)**

Postsecondary institutions will require an appropriate measure of funding in order to comply with the new standard. The provincial government must demonstrate their commitment to supporting students with disabilities and accessible postsecondary education by providing funding for institutions and students to help meet the goals of the postsecondary education accessibility standards. It is therefore recommended that:

* the government consider the financial mechanisms needed, and timelines to implement the Postsecondary Education Standards Committee recommendations at a systems-level view in order to support sustainable actions.
* allotments to support accessibility should be both on a permanent and short-term basis.
	+ the government consider creating new funding streams to support each phase of implementation of the new standards, and/or enhance the existing granting opportunities such as the Enabling Accessibility Fund to support appropriate resourcing
	+ provide additional stable funding

Note: if we rely only on the short-term funding (for example, grants), we would be attempting to implement changes that would include long-term shifts in deliverables and requirements with the same staffing complements and financial barriers that currently exist. This includes the cost of faculty and staff attending awareness training. It is therefore important that consideration is given to how an injection of funds will not only support the implementation of the standard but will also address long-term systemic challenges that will persist beyond a short-term implementation window.

* recognize the additional costs that must be defrayed by bilingual postsecondary institutions to accomplish the objectives

**Recommendation 8: Funding of a Centre of Excellence (non-regulatory)**

The ministry may fund the development of a Centre of Excellence on Accessibility to foster, develop, and disseminate the resources and advance the skills and talent with the specific technical expertise in accessibility detailed in the recommendations.

**Recommendation 9: Institution funding (non-regulatory)**

Postsecondary institutions should demonstrate prioritizing the success of the *Accessibility for Ontarians with Disabilities Act, 2005*, and new postsecondary accessibility standards through shifting institutional funding priorities to increase resources to support accessibility and persons with disabilities.

**Recommendation 10: *Accessibility for Ontarians with Disabilities Act 2005*, requirements for incorporated and unincorporated businesses (non-regulatory)**

Colleges and universities should ensure that legally incorporated businesses and nonprofits associated with the institution, specifically student unions, which are not otherwise covered under institutional governance structures, should be made aware of the institution’s commitment to accessibility and their expectation that the incorporated business understand and apply their obligations and reporting requirements under the *Accessibility for Ontarians with Disabilities Act, 2005*. Adherence to this requirement should be linked to their receipt of student activity fees.

* where the student government, student union or society is unincorporated, postsecondary institutions should require that these entities take responsibility for supporting student access and participation in non-academic campus life activities sponsored by the postsecondary institution or student government, union or society. Responsibilities include planning accessible events, including funding accessibility supports such as sign language interpreters and attendant services. Adherence to this requirement should be linked to their receipt of student activity fees.

**Barrier area 1: Attitudes, behaviours, perceptions, assumptions**

Attitudes can guide behaviours, perceptions and assumptions. The Ontario Human Rights Commission (2018) noted, “stigma, negative attitudes and stereotypes can lead to inaccurate assessments of students’ personal characteristics. They may lead educational institutions to develop policies, procedures and decision-making practices that exclude or marginalize students with disabilities. They can also create barriers for students with disabilities, with some students not feeling welcome or included in class activities, or social situations at school.”

Attitudinal barriers can also result in a form of internalized ableism. That is when negative attitudes and beliefs about disability, expressed or held by others (often, people in positions of authority), are directed towards persons with disabilities, and then accepted or endorsed by them on a personal level. This results in a negative self-view including feeling "less than” and a burden, self-doubt of one’s capabilities, and, that a perception that they do not “fit” or belong. Ableism often goes unrecognized and can significantly and negatively affect a person’s well-being, performance and access to opportunities in work and school.

The committee is therefore in agreement with the [Ontario Human Rights Commission’s](http://www3.ohrc.on.ca/sites/default/files/Policy%20on%20accessible%20education%20for%20students%20with%20disabilities_FINAL_EN.pdf) (2018) view that “we will not have an accessible province by 2025 without tackling the social attitudes that prevent persons with disabilities from participating and contributing to the community.” The committee recognizes that attitude change cannot be mandated. These recommendations are meant to foster long-term meaningful change in how people with disabilities are perceived and provide a pathway to more inclusive practices.

In this section, we offer specific recommendations to foster a change in the following five areas, while also recognizing a multidimensional framework is required to shift culture to create lasting attitudinal and behavioural change:

* transformational leadership
* accountability: metrics and performance measures
* research and scholarship
* awareness
* language

It will be through the combination of, and synergy among, all the postsecondary education recommendations, the other accessibility standards and strong transformational leadership that will help shift attitudes, behaviours, perceptions and assumptions.

**Theme 1: Transformational leadership**

**Recommendation 11: Change management plan**

1. All publicly funded colleges and universities shall develop a change management strategy to respond to the Postsecondary Education Standards Development Committee recommendations, and articulate this strategy to students, staff and faculty.

To consistently integrate the commitments and values of inclusion into daily practices and decision-making, the institution’s change management strategy shall include, but is not limited to:

* who will provide senior leadership to oversee and monitor the implementation of the Postsecondary Education Accessibility Standards, including who will oversee the Accessibility Advisory Committee ([recommendation 17](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec17))
* how to leverage resources to effect change on an ongoing basis
* how the institution will engage stakeholders to implement the regulation including senior leaders, managers and supervisors
1. As part of the change management plan senior executive leadership shall develop, and adopt, a communication strategy that is readily accessible, understandable and includes key messages embedded in communications across many platforms and customized to various audiences.

The communication strategy shall:

* consistently communicate the reason for the change management strategy
* on an annual basis, inform the institutional community and the public of the institution’s commitment and values related to accessibility and inclusion of persons with disabilities. This message must:
	+ clarify the relationship between the  *Accessibility for Ontarians with Disabilities Act, 2005*, and *Ontario Human Rights Code*, and the rights of students with disabilities to be accommodated in connection with programming and academic life and experiential learning under legislated requirements and the principles of the institution on equity, diversity, inclusion, accommodation and transitions
	+ emphasize collective responsibilities under the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*
	+ encourage a culture of accountability
	+ communicate a statement of principles on accessible and inclusive pedagogy/andragogy that takes into account:
		- the diversity of learning environments within postsecondary education, including experiential learning (for example, in-person and online lectures, labs, fieldwork, practicum placements, apprenticeships, etc.)
		- formal and informal learning environments
		- the diversity of learning needs within the student population, inclusive of the different ways that students, particularly students with disabilities, take in, process and communicate information
		- the diversity of academic environments and programs within colleges and universities (for example, college diplomas, university Bachelor’s, Master’s and Doctoral programs, first versus second entry programs, post graduate diplomas and certificates, etc.)
		- the diversity of teaching staff within colleges and universities (research faculty, teaching faculty, part-time and sessional faculty, instructors, etc.)
		- learning expectations, both explicit and hidden, within academic courses, programs and disciplines
		- individuality and uniqueness in teaching approaches and learning expectations in course and program syllabi, among institutions, and even among faculty within the same department at a given institution
	+ provide a website link to the institutional Multi-Year Accessibility Plan that outlines the organization’s strategy to prevent and remove barriers and the Annual Status Report that outlines the progress of measures taken to comply with the regulations, including the Postsecondary Education Standard.
* include range of methods to engage students, staff and faculty including the use confidential surveys, focus groups and informal feedback collection
* ensure proper representation of people with disabilities in the development and content of all communications and promotional materials

Evidence of attainment of the Statement of Commitment to Accessibility will be provided through Annual Status Reports.

**Timeline:** a) Within six months of the regulation being enacted; b) within one year of the regulation being enacted; c) the institutions Statement of Commitment will be reviewed and updated, if required, every three years.

**Recommendation 12: Infrastructure and resources (non-regulatory)**

To support the success of the Postsecondary Education Accessibility Standards, the Ontario government, as well as colleges and universities, should demonstrate their commitment to accessibility and disability inclusion through their actions.

New Postsecondary Education Accessibility Standards come with additional responsibility for an already overburdened system. It is recommended the Ministry of Colleges and Universities and postsecondary institutions allocate sufficient resources and build infrastructure across the institutions and ministries to implement the standards and change management plan. This may include re-allocation and prioritization of sufficient resources within the ministry and postsecondary institutions. Providing adequate resources demonstrates a significant commitment to address the barriers in the education system faced by students with disabilities.

The intended uses for increased resources include but are not limited to:

* supporting the change management plan. Increasing funding and support to staff responsible for the *Accessibility for Ontarians with Disabilities Act, 2005*, to support the change management plan
* increasing support to the services for students with disabilities: make use of federal funding and increase the existing Accessibility Fund for Students with Disabilities to enhance services and supports available for students with disabilities at postsecondary institutions (Council of Ontario Universities, 2020) as defined by the Accessibility Fund for Students with Disabilities eligibility requirements.
* supporting universal design and online learning infrastructure: ensure postsecondary institutions have the resources and infrastructure to engage students and that all students have an equal opportunity to succeed (Council of Ontario Universities, 2020).
	+ a recent example of this is [Ontario’s Virtual Learning Strategy](https://news.ontario.ca/en/release/59600/ontario-invests-in-virtual-learning-strategy), launched in 2020
* securing services for multimedia accessibility (for example, closed captioning and described video)
* training disability-specialized career centre staff and expand programming to support student transition to employment
* capacity building activities in consideration of funding these activities per collective agreements and to address resistance and attitudinal barriers
* activities related to data collection and analysis required of the standard
* development of guides to support implementation of the standard

**Recommendation 13: Leveraging funding (non-regulatory)**

Postsecondary institutions’ senior executive leadership should identify, encourage, and support new and existing programs and fundraising efforts targeted to support the institutions accessibility initiatives, especially those that support the objectives of the Postsecondary Education Accessibility Standards and combating ableism.

Such initiatives may include scholarships for low-income students with disabilities, innovative programs for students with disabilities, research and scholarship in the field of disability, supporting the hiring of accessibility services staff, procurement of accessible equipment, etc.

**Recommendation 14: Traditions, myths, symbols (non-regulatory)**

Colleges and universities are encouraged to ensure a consistency in their efforts on a symbolic level to demonstrate that accessibility and inclusion are priorities. These include the “day-to-day decisions around issues of diversity [which] send powerful symbolic messages regarding an institution’s commitment to diversity. Intended and unintended messages conveyed from routine decisions suggest importance and priority… [it is] understanding the messages conveyed by one’s actions and creating a shared covenant that elevates diversity’s importance.” (Williams, 2013, p. 240)

Other examples of symbolic leadership include, but are not limited to:

* recognition and celebration of efforts that support equity-deserving groups and align with the institution’s equity, diversity and inclusion commitment. This can be through outlets such as award ceremonies.
* distribution of a memo from senior executive leaders to faculty, staff and students celebrating occasions such as the International Day of Persons with Disabilities and National AccessAbility Week.

**Theme 2: Accountability, metrics and performance measures**

**Recommendation 15: Annual status report**

Postsecondary institutions shall review, update and maintain the Annual Status Report on the progress of actions taken related to the regulatory and non-regulatory recommendations in the Postsecondary Education Accessibility Standards, including quality assurance-related metrics and innovative practices as they become available.

**Timeline:** Within one year of the regulation being enacted.

**Recommendation 16: Improving campus climate related to accessibility**

1. The Ontario government, in consultation with postsecondary institutions and disability stakeholders, shall develop or update an existing accessible standardized campus climate instrument. The instrument will be administered every three years to all enrolled students and current employees at postsecondary institutions to measure the effectiveness of efforts to address ableism amongst the students, and employees to identify gaps in initiatives to shift attitudes, behaviours, beliefs and assumptions related to disability.

The instrument shall assess a wide range of accessibility-related issues including, but not limited to:

* satisfaction of students with disabilities about accessibility and accommodations (on campus and experiential learning)
* satisfaction of students with disabilities with campus life and engagement
* the experiences of students with ableism, external and internal, and their sense of belonging
* faculty/instructor/administration awareness of, and attitudes towards, students with disabilities, accessibility and accommodations
* inclusive teaching practices
* awareness and attitudes of non-disabled students towards their peers with disabilities, accessibility and accommodation
1. Each postsecondary institution shall develop a plan to administer the instrument, to manage the analysis, and to respond to the feedback. Each postsecondary institution shall notify the prospective survey participants about the accessible formats and communications supports available to aid completing the campus climate instrument.
2. Make publicly available in the Annual Status Report the aggregate results within six to 12 months of administering the climate instrument.
3. Specify the actions the institution will take to address the findings of the campus climate instrument including consulting the accessibility advisory committee to analyze and respond to the survey responses. Each postsecondary institution’s Annual Status Report shall include the progress of measures taken to address these findings.

**Timeline:** a) Published within 18 months of the regulation being enacted, b) within two years of the regulation being enacted, c) within six months of the survey closing, d) within three years of the regulation being enacted.

**Recommendation 17: Establish an accessibility advisory committee**

1. Each institution shall establish, or entrust, a new or existing accessibility advisory committee to address and advise on accessibility barriers in the educational environment.

**Duties of committee:**

The committee shall:

* advise the institution about the requirements and implementation of accessibility standards
* consult on the institutions multi-year planning processes
* recommend strategies to address their community’s disability-related attitudes, behaviours, perceptions, assumptions and other barriers outlined in the standards

The committee shall be provided with clear goals, action plans, information and resources to enable them to give meaningful input on addressing accessibility barriers and complying with the postsecondary regulations. This includes representation data, metrics and performance measures, and findings of the campus climate instrument.

The committee shall meet a minimum of twice annually and report to a senior executive leader (for example, vice president of human resources and/or vice provost, students). The senior executive leader shall be responsible for providing updates to senior leadership and convey key commitments across the organization.

**Members**

Where possible, at least 50% of the members of the committee should be students, faculty and staff with diverse lived experiences of disability and with consideration of intersectional identities, and include but not be limited to:

* representative(s) from the Office(s) for Students with Disabilities
* representative of an *Accessibility for Ontarians with Disabilities Act, 2005*, lead for the institution, if applicable
* representative of the HR department managing staff/faculty accommodations
* representative of other human rights offices, if applicable, established at the institution (for example, race relations, Indigenous, sexual diversity office, etc.)
* representative(s) from facilities services for the institution to address physical barriers
* Centres for teaching and learning
* libraries or campus bookstores, the units responsible for acquiring or providing the majority of academic materials in accessible formats
* student life
* other representatives of persons with, and without, disabilities as designated by the institution to ensure a range of perspectives

A Chair shall be established for the committee who has content knowledge in the area of disability and intersectionality and preferably with lived experience of disability.

Postsecondary institutions shall ensure that student members of this committee are fairly compensated and provided opportunities to meaningfully engage throughout the entire planning and design process for any physical spaces, and in any plans, procedures or policies developed as part of these standards.

1. The input and activities of this committee shall be included in all project updates and the Annual Status Report.

**Timeline:** a) Within two years of the regulation being enacted; b) Within three years of the regulation being enacted.

**Recommendation 18: Representation data collection**

The Ministry for Seniors and Accessibility, in collaboration with partner ministries and stakeholders, shall create a standardized mechanism for postsecondary institutions to collect data about students with disabilities and persons with disabilities they employ.

1. All postsecondary institutions shall collect and analyze this data every three years and make this publicly available through the Annual Status Report.

When administering the data collection instruments the institutions shall:

* clearly set out a purpose of data collection that is consistent with the *Ontario Human Rights Code*
* advise the people about whom data are being collected, as well as the broader public in general: why such information is being gathered, its potential uses, how the data will be collected, and the steps taken or, that will be taken, to protect privacy and confidentiality of responses
* collect aggregate data that must not include any information that would reveal the identity of persons with disabilities
* take measures to respond to trends and address inequalities that may arise from data collection (for example, underrepresentation of people with certain types of disabilities), recognizing representation does not measure inclusion
* ensure data collection procedures, storage, access and disclosure are carefully controlled
* always respect confidentiality and dignity

Data collected should align with definitions and terminology that is being used elsewhere in reports to the Ontario government including but not limited to:

* number of students with disabilities registered with the offices for students with disabilities as defined in the reporting requirements of the Accessibility Fund for Students with Disabilities
* type of disabilities (for example, physical, developmental/intellectual, mental health, etc.) as defined in the reporting requirements of the Accessibility Fund for Students with Disabilities and be disaggregated to determine whether the student identifies with any other code ground (for example, sex, race, Indigenous ancestry, etc.)
* proportion of first-entry undergraduate, and graduate students, who self-identify as a student with a disability and the proportion of these students who identify themselves as holding other identities (for example, LGBTQ, Black, etc.)
* number of students with disabilities participating in academic pathway programs, if applicable
* number of non-teaching employees who self-identify as a person with a disability and types of disability
* number of faculty/instructors who self-identify as a person with a disability and types of disability
1. The data shall be shared with the Accessibility Advisory Committee.

Where a survey “may result in small cells of information (that is, where a small number of people is being represented) that could inadvertently identify or be used to identify an individual” (IPCO, 2015, p. 25) an institution shall be exempt from reporting this identifying data in the Annual Status Report and to the Accessibility Advisory Committee.

**Timeline:** a) within two years of the regulation being enacted, and b) within six months of data collection.

**Recommendation 19: Metrics and performance measures**

To assess institutions’ performance, and prevent or ameliorate disadvantage, measures of retention, graduation rate and time to completion shall include collecting data on full-time and part-time students with disabilities.

The institutions shall analyze the retention, graduation and time to completion rates and shall determine if specific interventions to improve retention and graduation rates for students with disabilities are required. This may include assessing if barriers, including attitudinal barriers, impact these rates by conducting surveys of students who withdraw from school or drop courses as to the reason they are withdrawing. If specific action is taken, this shall be reported in the Annual Status Report and considered when developing the Multi-Year Accessibility Plan.

Where other data is collected to assess the institutions’ performance, postsecondary institutions will identify strategies to ensure part-time students with disabilities are not excluded from data analysis.

**Timeline:** Within three years of the regulation being enacted.

**Theme 3: Research and scholarship**

**Recommendation 20: Research and scholarship (non-regulatory)**

The Ministry of Colleges and Universities and publicly funded colleges and universities should:

* embed accessible and inclusive pedagogy/andragogy as a criterion for evaluation into institutional teaching awards
* embed accessible pedagogy/andragogy as a criterion for evaluation into provincial and institutional research grants and funding opportunities
* stimulate funding for research and scholarship in the area of disability, including funding teaching and research positions on disability conducted by persons with disabilities
* incentivize research and scholarship in the area of disability including embedding accessible pedagogy/andragogy as a criterion for evaluation into provincial and institutional research grants and funding opportunities and into institutional teaching awards
* create scholarships for undergraduate and graduate students who are enrolled in disability studies to support research and scholarship in this area
* encourage inter-disciplinary collaborations to advance disability knowledge in higher education

**Theme 4: Awareness**

**Recommendation 21: Awareness**

The Ontario government shall take an active role in the promotion of a cultural shift towards an accessible and inclusive society.

The government shall develop guidance documents for obligated organizations and conduct a sustained, multi-faceted ongoing public education campaign on accessibility. Any guidance materials developed should support the Ontario Human Rights Commission’s policies including, but not limited to: Policy on [Accessible Education for Students with Disabilities](http://ohrc.on.ca/en/policy-accessible-education-students-disabilities#overlay-context=en/policy-employment-related-medical-information), [Policy on Ableism and Discrimination Based on Disability](http://www.ohrc.on.ca/en/policy-ableism-and-discrimination-based-disability), and be made in collaboration with members of the disability community.

**Timeline:** Within 18 months of the regulation being enacted.

**Theme 5: Language**

**Recommendation 22: Language**

The ministry shall adopt new definitions provided in the glossary of terms ([Appendix B](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#section-13)), in the new Postsecondary Education Accessibility Standards.

**Timeline:** Immediately upon regulation being enacted.

**Barrier area 2: Awareness and training**

Accessibility and inclusion are constantly evolving, and knowledge that may be current one year is likely to be outdated the next. Recommendations in this section build upon the requirements of the information and communications standards. However, there is currently no requirement for periodic refreshing of any previously received staff training.

Our recommendations are meant to cascade and be viewed as a whole. We present an overarching recommendation for strong leadership by the Ontario government in coordinating the development of the 13 training recommendations for specific audiences.

To ensure a consistent and portable quality of training for all postsecondary employees and students, the Ministry for Seniors and Accessibility in collaboration with the Ministry of Colleges and Universities should take the lead in procuring the development, renewal and providing of standardized accessibility training across the province regardless of postsecondary institution.

All employees (faculty and teaching staff, as well as, academic, student services and support staff) should receive mandatory, paid, foundational employee onboarding training and awareness education related to the *Accessibility for Ontarians with Disabilities Act, 2005*, and how it applies to a postsecondary education setting, ableism and discrimination. They should also engage in activities to promote self-examination and recognize implicit bias. Accessibility training is to be renewed every three years.

**Theme 1: Government leadership**

**Recommendation 23: Accessibility lens training**

Individuals responsible for developing and/or delivering institutionally sanctioned programming must be trained on applying the *accessibility lens* ([recommendation 100](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec100)) in all programming. This includes student groups, student unions and societies.

**Timeline:** Within two years of the regulation being enacted.

**Recommendation 24: Training**

1. The Ministry for Seniors and Accessibility and the Ministry of Colleges and Universities shall engage persons with disabilities to co-develop standardized and inclusive training for employees on their rights and responsibilities under the *Ontario Human Rights Code*, Postsecondary Education Accessibility Standards and all other accessibility standards as they apply to postsecondary institutions. The training shall employ best practices in pedagogy, including use of a self-assessment to help guide learning, allowing learners to extend understanding and bypass well-understood items, availability in multiple modes and including reflection questions to help connect content with lived experience.
Online training in both official languages shall be provided to postsecondary institutions across the province and the Ontario Government shall not charge a fee for providing such training.
Training modules shall be regularly updated ([recommendation 25](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec25)) to reflect best practices.
2. All postsecondary institution employees shall undergo this training as soon as practicable after they are assigned their applicable duties. Any training developed will be compatible with multiple learning management systems for ease of integration. Each institution is encouraged to tailor additional content based on their context (for example, specific policies, academic accommodations and those identified by the Ontario Human Rights Commission, appeal procedures, practices, and technologies); however, to maintain consistency the recommendation is to not remove any standardized content.
All training in recommendations [26](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec26) to [39](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec39) should include an intersectional and anti-oppressive approach highlighting the intersections of disability with other grounds under *Ontario Human Rights Code*.

**Timeline:** a) within one year of regulation being enacted and b) within two years of regulation being enacted.

**Recommendation 25: Continuous quality improvement**

The government shall establish a continuous quality improvement unit/team within the Ministry for Seniors and Accessibility and the Ministry of Colleges and Universities to receive feedback on the training and update content every three years.

**Timeline:** Within one year of regulation being enacted. Training will be revised every three years.

**Recommendation 26: All employees**

All postsecondary institution employees shall undergo mandatory employee training at onboarding and be renewed every three years. This training will be online and will educate employees on their rights and responsibilities on the duty to accommodate people with disabilities under the *Ontario Human Rights Code*, the Postsecondary Education Accessibility Standards and the Canadian Charter of Rights and Freedoms, all other accessibility standards as they apply to postsecondary institutions, and on ableism, microaggressions, implicit bias, and discrimination.

**Timeline:** Within two years of regulation being enacted.

**Theme 2: Training for specific audiences**

**Recommendation 27: Training for student unions and student leaders**

All postsecondary student unions, governments and societies, incorporated or not, shall undergo mandatory training at onboarding and this training is to be renewed every three years. This training will be online and will educate employees on their rights and responsibilities on the duty to accommodate people with disabilities under the *Ontario Human Rights Code*, the Postsecondary Education Accessibility Standards and the Canadian Charter of Rights and Freedoms, all other accessibility standards as they apply to postsecondary institutions, and on ableism, microaggressions, implicit bias, and discrimination.

**Timeline:** Within two years of regulation being enacted.

**Recommendation 28: Student unions and student leaders and obligations under the *Accessibility for Ontarians with Disabilities Act, 2005* (non-regulatory)**

The Ontario government, with the support of postsecondary institutions, should remind all incorporated postsecondary student governments, unions and societies of their obligations to comply with and report compliance with *Accessibility for Ontarians with Disabilities Act, 2005*, and its regulations, by having postsecondary institutions report their Multi-Year Accessibility Plans and Annual Status Reports publicly.

Where the student government, union or society is unincorporated, postsecondary institutions should require that their student government, union or society support student access and participation in non-academic campus life activities by funding accessibility supports, such as sign language interpreters and attendant services, and to link this requirement to their receipt of student activities fees.

**Recommendation 29: Third-party contractors**

Where postsecondary institutions enter into contractual agreements with third parties to deliver any service on campus (for example, food services, health services, physiotherapy, pharmacies, operators of student residences), all third-party staff shall undergo mandatory training at onboarding and be renewed every three years. This training will be online and will educate employees on their rights and responsibilities on the duty to accommodate people with disabilities under the *Ontario Human Rights Code*, the Postsecondary Education Accessibility Standards and the Canadian Charter of Rights and Freedoms, and all other accessibility standards as they apply to postsecondary institutions, and on ableism, microaggressions, implicit bias, and discrimination.

**Timeline:** Within two years of regulation being enacted.

**Recommendation 30: Educators and librarians**

In addition to [recommendation 25](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec25), all postsecondary educators and librarians shall undergo mandatory educator training related to:

* *Integrated Accessibility Standards Regulation* with an emphasis on their responsibility in procurement and purchase of accessible equipment and accessible course content materials.
* the accommodation process as outlined by the *Ontario Human Rights Code*.
* compliance with the *Copyright Act of Canada* and other relevant legislations, treaties, agreements or conventions (for example, the Marrakesh Treaty) ([recommendation 43](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec43)).
	+ the Ontario government shall develop the mandatory training resources on the *Copyright Act of Canada* and Marrakesh Treaty.
* the impact of choosing teaching materials/training resources late has on students with disabilities.
* the minimum accessible and inclusive pedagogy/andragogy standards per the assessment, curriculum and instruction barrier ([recommendation 40](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec40)) related to accessibility standards for teaching and learning.

Employee training must be renewed every three years.

**Timeline:** Within two years of regulation being enacted.

**Recommendation 31: Postsecondary education administrators and leadership**

In addition to [recommendation 26](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec26), all postsecondary education administrators and senior leadership (for example, Boards, Trustees, and Senates) shall undergo mandatory training related to:

* system level barriers to accessibility and the impacts of policy decisions
* organizational responsibility for preventing and addressing human rights issues including organizational liability for the actions of employees (for example, faculty refusing academic accommodations or purchasing inaccessible educational technology)
* developing, preventing and removing barriers with an accessibility lens
* staffing decisions (for example, late hiring and sessional staff) and their impact on students with disabilities
* the impacts of lack of funding for additional accessibility training has on the overall experience of students with disabilities
* the importance of allyship

Employee training must be renewed every three years.

**Timeline:** Within two years of regulation being enacted.

**Recommendation 32: Disability services staff**

In addition to [recommendation 26](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec26), all postsecondary education disability services staff shall undergo:

* additional training on ableism, microaggressions, and discrimination while acknowledging the personal lived experience of employees with disability.
* social aspects of disability and unique barriers students with disabilities experience in the postsecondary education environment; emotional cost of navigating the accommodation system
* pathway to report system barriers is transparent and broadly communicated, for example, as part of the role of the Ombudsman’s office
* allyship

Employee training must be renewed every three years.

**Timeline:** Within two years of regulation being enacted.

**Recommendation 33: Career counsellors/advisors**

In addition to [recommendation 26](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec26), all postsecondary education career counsellors/advisors, co-op officers, shall undergo mandatory career counselling training related to:

* [employment standards](https://www.ontario.ca/laws/regulation/110191) under the *Integrated Accessibility Standards Regulation*
* specialized training on career transitions for persons with disabilities and counselling students with disabilities on career options
* how intersectionality may further compound the challenges students with disabilities may have in employment
* transition for students with disabilities into the workforce, in the context of work-integrated learning

Employee training must be renewed every three years.

**Timeline:** Within two years of regulation being enacted.

**Recommendation 34: Media/creative arts/communications staff**

In addition to [recommendation 26](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec26), all postsecondary education media/creative arts/communications staff shall undergo mandatory media, creative arts and communications training related to:

* creating and assessing accessible media and responsibilities under the information and communication standards
* media portrayal of people with disability, including social media
* using inclusive language

Employee training must be renewed every three years.

**Timeline:** Within two years of regulation being enacted.

**Recommendation 35: Information technology staff**

In addition to [recommendation 26](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec26), all postsecondary education IT staff shall undergo mandatory IT training related to:

* creating and assessing accessible media and responsibilities under the information and communication standards, including social media
* digital/accessible learning technologies
* using inclusive language
* including the value of usability testing, with the recommendation of paying users to provide feedback

Employee training must be renewed every three years.

**Timeline:** Within two years of regulation being enacted.

**Recommendation 36: Facilities management/design/construction staff**

In addition to [recommendation 26](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec26), all postsecondary education facilities management staff shall undergo mandatory architecture and design training related to:

* physical and architectural barrier recommendations [127](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec127)-[129](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec129).
* the training will align with the standards developed under the physical and architectural barriers section, including [recommendation 153](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec153), any professional working with the institution by the vendor for which they are working at the time of bidding for a project shall provide proof of training.

Employee training must be renewed every three years.

**Timeline:** Within two years of regulation being enacted.

**Recommendation 37: Event planners and hosts**

1. The Ministry, in collaboration with postsecondary institutions shall consult with stakeholders to create and/or adopt an accessible event planning and content delivery tool.
2. Postsecondary institutions shall publish and require the use of the accessible event planning and content delivery tool indicated when delivering in-person and virtual events and activities to ensure they are accessible to students with disabilities.
3. All postsecondary education faculty and staff responsible for event planning shall undergo mandatory event management training that includes in-person and on-line components on their rights and responsibilities under the *Ontario Human Rights Code*, Postsecondary Education Accessibility Standards and all other accessibility standards as they apply to postsecondary institutions. Individuals who are responsible for or highly involved/integral to the planning and hosting of events shall complete the training. These individuals include, but not limited to:
	1. faculty and staff who plan seminars, symposia, colloquia and conferences that are part of the formal and informal learning requirements of programs of study
	2. student affairs personnel
	3. student government, student societies/associations, and student groups staff and volunteers
	4. orientation leaders
	5. sports and recreation staff and volunteers
	6. residence administration and staff (temporary and permanent), including residence life personnel
	7. personnel responsible for planning large scale institutional events such as convocation
	8. third-party organizations hosting student events on or off campus
4. This training aligns with [recommendation 56](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec56) (symposia, seminars, colloquia and conferences).

Training shall include how to create accessible media and other responsibilities pertaining to planning or hosting events as required by the information and communication standards and must be renewed every three years.

**Timeline:** Within two years of the regulation being enacted.

**Recommendation 38: Protective services and emergency management services**

In addition to [recommendation 26](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec26), all protective services and emergency management services staff and volunteers at postsecondary institutions shall undergo mandatory training related to:

* safety training for students with disabilities
* mental health awareness and de-escalation training

**Timeline:** Within two years of regulation being enacted.

**Recommendation 39: Student health centre**

In addition to [recommendation 26](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec26), all postsecondary education staff and third-party health care providers contracted by the student health centres shall undergo mandatory training related to:

* the intersectionality between accessibility and mental health awareness
* barriers to accessing health services for students with disabilities
* where appropriate, any training on new accessibility standards for health care will be applied to all campus student health centre staff

**Timeline:** Within three years of the regulation being enacted.

**Barrier area 3: Assessment, curriculum and instruction**

Postsecondary institutions have grappled with providing equitable access to assessments, curriculum and instruction for students with disabilities. This struggle arose because the current pedagogical practices in higher education evolved from a system that did not consider the full inclusion of students with a diverse range of abilities and learning needs. As a result, students with disabilities have come to rely on a cumbersome and expensive process of vetting and approving academic accommodations so that they may gain equal access to postsecondary education.

We approached the barriers in our learning environments with a systemic lens – that the system was not designed for inclusion, and in order to change this, we need to look at all the overall systems that impact and support learning in postsecondary education.

Our recommendations fall into the following six key areas:

* pedagogy/andragogy
* accessible format educational materials
* institutional responsibility
* quality assurance
* diversity of learning environments
* proposals

**Theme 1: Pedagogy/andragogy**

**Recommendation 40: Accessibility standards for teaching and learning**

The Ontario government shall work with postsecondary institutions, especially with their centres for teaching and learning, to create a common set of accessibility standards for all teaching and learning offered through the postsecondary institutions, including but not limited to college diplomas, apprenticeships, post-graduate diplomas, undergraduate, graduate and professional degrees, continuing education and micro-credentials. The creation of these accessibility standards shall be consultative and involve discussions with the Ontario Human Rights Commission (OHRC), students with disabilities, accommodation service providers and other relevant stakeholders.

The common accessibility standards shall include best practices for teaching in a variety of settings, including but not limited to in-person and virtual:

* lectures (including capturing verbal components)
* seminar
* labs
* studios
* field trips, out-of-classroom experiences (for example, land-based experiences)
* synchronous vs. asynchronous learning
* learning management systems (for example, common use of features and navigation)

These common accessibility standards will reflect the diversity and intersecting identities of students with disabilities, such as Black, Indigenous, people of colour, LGBTQ. The common standards and expectations should be created from the best research, reports and practices, including but not limited to:

* [Universal Design for Learning](https://www.cast.org/impact/universal-design-for-learning-udl)
* [Accessiblecampus.ca](https://accessiblecampus.ca/)

**Timeline:** Within two years of the regulation being enacted and to be reviewed every five years.

**Recommendation 41: Accommodations, accessibility and academic freedom (non-regulatory)**

The Ministry of Colleges and Universities, in consultation with the Ontario Human Rights Commission (OHRC), Council of Ontario Universities and Colleges Ontario, should advise postsecondary institutions on the application of accommodations and accessibility for students with disabilities where there is a question of its overlap with academic freedom. Resources that clarify this intersection should be provided and communicated.

**Recommendation 42: Resource guides on accessible and inclusive pedagogy/andragogy**

The Ministry of Colleges and Universities, working with Colleges Ontario, the Council of Ontario Universities and postsecondary institutions, shall create and make available resource guides on accessible and inclusive pedagogy/andragogy created in [recommendation 40](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec40). These resource guides shall be shared with all teaching staff, including but not limited to, full-time, part-time and sessional faculty, lab demonstrators, teaching assistants and guest presenters involved in their courses. Where possible, resource guides should be tailored to broad discipline areas, particularly those with more significant technical considerations (such as science, technology, engineering and mathematics, healthcare, the arts). These resource guides should be refreshed regularly (for example, once every five years), and should be independent of method of course delivery (in-person, blended, remote, online, etc.). These resource guides should be developed using the statement of principles on accessible and inclusive pedagogy/andragogy.

**Timeline:** Within three years of regulation being enacted, and subsequent to each legislated review.

**Theme 2: Accessible format educational materials**

**Recommendation 43: Accessibility of textbooks and reading packages**

1. Postsecondary institutions shall mandate that faculty and teaching staff use textbooks, reading packages and other learning materials which are available in multiple formats (hard copy, electronic copy, audio, etc.), in compliance with the *Copyright Act of Canada* and other relevant legislation, and make reference to treaties, agreements or conventions (for example, Marrakesh Treaty).
2. Postsecondary institutions shall require that accessible format textbooks, reading packages and other learning materials be available within a reasonable timeframe\* of acquisition of materials for the class at large.
3. Where accessible formats are not available for textbooks, reading packages and other learning materials sourced (not created) by faculty and members of teaching teams, alternative means of representing the information content which permit students with disabilities to access the learning and equal opportunity to achieve the relevant essential requirements, shall be provided.

\*Each postsecondary institution must create a policy on what an acceptable “reasonable” timeframe is for various programs/courses, including process to follow to remedy the situation if accessibility falls outside of a reasonable timeframe.

**Timeline:** Within one year of the regulation being enacted.

**Recommendation 44: Supporting publishers towards meeting accessibility requirements of published resources (non-regulatory)**

The Ontario government should work with publishers through established partnerships (for example, Canadian Research Knowledge Network, Ontario Colleges Library Services, Ontario Council University Libraries) to support colleges and universities in meeting accessibility requirements of published resources and to provide guidance on how to navigate competing legislation.

**Recommendation 45: Student requests for accessible formats**

All postsecondary institutions shall have a published process for students to request accessible format materials (include timelines and solutions offered to the student when there is a long wait).

**Timeline:** Within one year of the regulation being enacted.

**Recommendation 46: Accessibility of course materials and assessments**

All course materials and assessments created (not sourced) by faculty and members of teaching teams shall be produced in an accessible format that can be converted to meet different accessibility needs.

When accessible format course materials and assessments sourced (not created or produced) by faculty and members of teaching teams are not available, alternative means of representing the information content which permit students with disabilities to access the learning and equal opportunity to achieve the relevant essential requirements, shall be provided.

**Timeline:** Within three years of the regulation being enacted.

**Recommendation 47: Accessibility of multimedia course materials and assessments**

All multimedia course materials and assessments created (not sourced) by faculty and members of teaching teams shall be produced and available in multiple accessible formats.

When accessible format multimedia course materials and assessments sourced (not created or produced) by faculty and members of teaching teams are not available, alternative means of representing the information content which permit students with disabilities to access the learning and equal opportunity to achieve the relevant essential requirements, shall be provided.

**Timeline:** Within three years of the regulation being enacted.

**Recommendation 48: Training about accessible document and multimedia formats (non-regulatory)**

The Ontario government should develop the mandatory training resources on accessible documents and multimedia resources for [recommendation 26](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec26).

**Theme 3: Institutional responsibility**

**Recommendation 49: Identification and communication of bona fide and essential academic requirements**

Bona fide and essential academic requirements of a program/course shall be made publicly available. To parallel the K-12 system and to comply with the Ontario Human Rights Commission (OHRC) recommendation (8.4.5 – bona fide academic requirements, Policy on Accessible Education for Students with Disabilities, 2018), postsecondary institutions shall make publicly available the established bona fide and essential academic requirements for all programs in multiple locations, such as the program website, program manual and course outlines/syllabus and teaching and learning plans.

**Timeline:** Within two years of the regulation being enacted.

**Recommendation 50: Linking assessments to essential academic requirements**

Postsecondary institutions shall ensure that courses explicitly identify how each assessment (diagnostic, formative or summative) is connected to the bona fide and essential academic requirements on the courses outline, syllabus or teaching and learning plan.

**Timeline:** Within two years of the regulation being enacted.

**Recommendation 51: Expert resources on accessible and inclusive pedagogy/andragogy (non-regulatory)**

Postsecondary institutions should create staff roles for dedicated experts on accessible and inclusive pedagogy/andragogy to act as a resource for course coordinators, part-time and sessional faculty, lab demonstrators, teaching assistants and guest presenters involved in their courses. Where possible, discipline-specific expertise should be cultivated within each institution.

**Theme 4: Quality assurance**

**Recommendation 52: Accessibility embedded into the quality assurance process (non-regulatory)**

The Ministry of Colleges and Universities should work with [Ontario Universities Council on Quality Assurance](https://oucqa.ca/) and the [Ontario College Quality Assurance Service](https://www.ocqas.org/) to include accessibility criteria into its program review and new program approval process. These criteria should include, but is not limited to:

1. common accessibility standards and guidelines ([recommendations 40](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec40))
2. an outline of how course and/or program assessments are linked to bona fide academic requirements and essential academic requirements
3. documentation of the use of accessible format course materials policies and guidelines that impact accessibility for students

**Recommendation 53: Documenting accessibility in student course feedback surveys**

Postsecondary education student course feedback surveys and program reviews shall include mandatory question(s) related to the Postsecondary Education Accessibility Standards compliance and inclusive instructional design (such as, integrate lived experiences of students with disabilities, including those with intersectional identities, and backgrounds, of both students and teaching team) in the learning environment. Responses from the surveys should be used in continuous quality improvement of accessibility and inclusivity of the course or program.

**Timeline:** Within one year of the regulation being enacted.

**Theme 5: Diversity of learning environments**

**Recommendation 54: Specialized discipline hubs (science, technology, engineering and mathematics, trades, healthcare and the arts) (non-regulatory)**

Postsecondary institutions should create internal discipline-specific expertise “hubs” in developing accessible and inclusive pedagogy and andragogy approaches in these fields. These “hubs” should be formed by identifying faculty and teaching staff in science, technology, engineering and mathematics, trades, healthcare and arts disciplines to work with centralized institutional resources.

**Recommendation 55: Virtual and in-person labs and simulations (non-regulatory)**

Postsecondary institutions should facilitate regular reviews of existing and new labs using practical space-oriented instruction, including in the context of science, technology, engineering and mathematics, healthcare and arts programs, as part of the quality assurance process. These reviews will focus on the essential academic requirements of the labs and practical activities, in order to ensure that students with disabilities have equal opportunity to participate in this aspect of their programs effectively. Reviews should take place through the quality assurance process for courses and programs.

Postsecondary institutions should ensure that all virtual labs are delivered in accessible ways that allow for equal opportunity for student engagement, with audio description, captioning and sign language interpretation as appropriate.

When sourcing simulation activities to complement or supplement in-person and virtual labs, postsecondary institutions should provide support to teaching teams to ensure the accessibility of the simulation activities.

**Recommendation 56: Symposia, seminars, colloquia and conferences**

Postsecondary institutions shall mandate that all seminars, symposia, colloquia and conferences that are part of the formal and informal learning expectations of programs of study adhere to accessible and inclusive event planning and content delivery guidelines, in compliance with [recommendation 37](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec37): event planners and hosts. (Applicable both to in person and virtual events.)

**Timeline:** Within three years of the regulation being enacted.

**Recommendation 57: Graduate supervision**

1. the Ministry of Colleges and Universities, working with the Council of Ontario Universities, shall develop a common set of guidelines and resources for graduate faculty members in accessible and inclusive supervision of graduate students with disabilities, including best practices for virtual supervision.
2. postsecondary institutions shall mandate that all faculties of graduate studies and graduate departments have explicit policies, practices and guidelines on accessibility and accommodation for graduate students with disabilities, which are developed with the consultative committee. Policies should include consideration of disclosure, accommodation, student supervision and graduate assessments (for example, comprehensive exams and thesis defenses), a respectful environment and dignity of the student, and take into account the roles of graduate students as academic/research staff and university employees.

**Timeline:** a) within one year of the regulation being enacted, and within (b) three years of the regulation being enacted.

**Recommendation 58: Admission and employment offer letter practices for graduate students**

Postsecondary institutions shall review admissions and employment offer letter practices for graduate programs and academic employment opportunities, to ensure that they are clearly separated, with appropriate accessibility and accommodation language that directs students to the relevant offices for each aspect of their graduate student experience.

**Timeline:** Within two years of the regulation being enacted.

**Recommendation 59: Student employee accommodations**

Postsecondary institutions shall ensure that human resources policies within the institution’s control include and consider the variety of accommodation scenarios of student employees and that these policies and procedures are clearly communicated and made available to student employees.

**Timeline:** Within one year of regulation being enacted.

**Recommendation 60: Professional practicum placement and experiential learning supervision**

1. postsecondary institutions shall consult the consultative committee and students with disabilities in placement programs and other relevant stakeholders to develop a common set of guidelines and resources for practicum placement. and
2. postsecondary institutions, working with host organizations shall also develop accessible and inclusive supervision guidelines of students with disabilities, including virtual supervision best practices in experiential learning.

**Timeline:** a) within one year and b) two years of the regulation being enacted.

**Recommendation 61: Tracking of accessibility supports in the work integrated learning setting**

Postsecondary institutions shall create and maintain a record of accessibility features and supports available for students with disabilities at placement settings prior to finalizing agreements for work integrated learning placement opportunities in a consultative manner with host organizations.

**Recommendation 62: Jurisdiction of accessibility supports in work integrated learning settings (non-regulatory)**

The Ministry for Seniors and Accessibility and Ministry of Colleges and Universities should provide guidance to postsecondary institutions and employers with respect to the division of responsibilities and applicability of the standards and accommodations (Employment Standards and the Ontario Human Rights Commission) for students with disabilities in required work integrated learning settings.

**Theme 6: Proposals**

**Recommendation 63: Competencies and professional societies (non-regulatory)**

The Ministry of Colleges and Universities should take a leadership role in ensuring accessibility for students and new professionals with disabilities by advocating for accessibility standards to their competencies (which become bona fide academic requirements in postsecondary education) to be created and adopted by accreditation and professional bodies (for example, Ontario College of Physicians and Surgeons), both provincial and national.

**Recommendation 64: Communities of practice (non-regulatory)**

The Ministry of Colleges and Universities should work with discipline-specific professional societies to encourage the establishment of communities of practice whereby accessible format materials and specialized accessibility solutions to student needs (particularly those involving mainstream and assistive technology deployed in new ways) can be shared between and amongst institutions and faculty members in a proactive manner. Over time, this will result in the creation of a province-wide series of discipline-specific resource hubs for accessible format materials and academic accommodations.

**Recommendation 65: Accessible technology (non-regulatory)**

In alignment with [Phase 2 of the Information and Communications recommendations and the proposed “accessibility ecosystem” model](https://www.ontario.ca/page/review-information-and-communications-standards-2020-final-recommendations-report#section-3), the Ministry of Colleges and Universities should work with postsecondary institutions on relationship building with technology vendors to work towards accessibility in new innovative technologies and platforms that can impact education in the next decade.

**Recommendation 66: Resource library (non-regulatory)**

Postsecondary institutions, in collaboration with the Ministry of Colleges and Universities, should build upon the existing work done by the Ontario Council of University Libraries, Accessible Content e-portal, Alternate Education Resources Ontario and College Libraries Ontario create a high-quality centralized repository of accessible and inclusive course content, including, but not limited to, print matter, textbooks and accessible multimedia resources, potentially housed through the institutions’ libraries. Via such a repository, faculty and teaching team members can share (upload or download) accessible course content.

**Recommendation 67: Braille, captioning, described video and sign language interpretation**

1. the Ontario government shall explore, in partnership with postsecondary institutions, employers and apprenticeship bodies, establishing a postsecondary course to train live captionists in French and English, possibly in partnership with a court stenographer’s course.
2. the Ontario government shall explore, in partnership with postsecondary institutions, employers and apprenticeship bodies, increasing capacity in the province’s training capacity for *American Sign Language* (ASL) and *Langue des Signes Quebecoise* (LSQ) interpreters, with an emphasis on technical, academic and scholarly *American Sign Language* and *Langue des Signes Quebecoise* (particularly for science, technology, engineering and mathematics, trades and healthcare fields).
3. the Ontario government shall explore, in partnership with postsecondary institutions, employers and apprenticeship bodies, increasing capacity in the province’s training capacity for deaf-blind intervenors in French and English with an emphasis on technical, academic and scholarly language (particularly for science, technology, engineering and mathematics, trades and healthcare fields).
4. the Ontario government shall explore, in partnership with postsecondary institutions, employers and service providers, increasing capacity in Braille production for educational materials in the province.
5. the Ontario government shall explore, in partnership with postsecondary institutions, employers and service providers, increasing the capacity in French and English described video production for educational materials in the province.
6. the Ontario government shall create tools, resources and guidelines in French and English for the use and increased availability of described and integrated described video.

**Timeline:** Within one year of the regulation being enacted.

**Recommendation 68: Standards applying to teaching team and student-facing staff (non-regulatory)**

The Ontario government should ensure that the Postsecondary Education Accessibility Standards apply effectively to accessibility barriers experienced by administrators, faculty, adjunct faculty and teaching staff in the context of postsecondary education.

**Barrier area 4: Digital learning and technology**

In an accessible digital learning environment, students with disabilities must be able to access and use technology, produce and consume content, and engage in learning independently and effectively. The context of the recommendations in this section spans the postsecondary digital learning environment, where learning takes place online, remotely, blended and face-to-face using digital technology and digital content.

These recommendations were developed by committee members with expertise in digital technology, pedagogy, content, policy, procurement and practice. Each requirement involves barriers experienced or witnessed by one or more members.

Our recommendations fall into the following six key areas:

* accessible technology
* accessibility plan
* accessible procurement support
* accessibility training/practice
* accessible and inclusive pedagogy/andragogy
* accessible content

**Theme 1: Accessible technology**

Postsecondary institutions must ensure that accessibility is at the foundation of the use of digital tools in the practice of universal design for learning principles and their application to accessible and inclusive pedagogy/andragogy guidelines. Technology used in digital learning must be accessible to, and usable by, students with disabilities and be compatible for use with common assistive technologies and devices to accommodate a wide range of disability-related needs as per the following recommendations.

**Recommendation 69: Accessible technology alternative**

In cases where technological accessibility barriers continue to exist, a functionally usable alternative option meeting a recommended practice (such as the Equally Effective Alternate Access Plan) in addition to the requirements of the course and agreed upon by both the student and the educator must be provided for each barrier with an explanation prior to the start of the course or as soon as reasonably possible.

When such an agreement cannot be reached, the institution should follow the steps under [recommendation 111](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec111) (refusal of disability accommodation request) and inform the student of the availability of the dispute resolution process described under [recommendation 112](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec112) (resolving disability accommodation refusal disputes).

**Timeline:** Within two years of the regulation being enacted.

**Recommendation 70: Accessible technology alternative documentation and review**

All instances of functionally usable alternative options shall be documented in the student's accommodation plan and reviewed by the postsecondary institutions each term to determine if a more suitable permanent solution has been identified, in the case of any of the following:

* if the student is still registered in the course, by the student and the educator
* where the student is no longer taking the course, by the institutional lead for accessibility in consultation with the educator

**Recommendation 71: Digital accessibility plan**

Each postsecondary institution shall develop, in collaboration with the consultation committee (as per [recommendation 17](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec17): establish a committee), and make publicly available their plan – and annual progress reports on this plan – to seamlessly implement the adopted province-wide Accessible procurement standards for educational resources as per [recommendation 105](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec105): Accessible procurement policies and procedures. In addition, this plan shall include the minimum accessible and inclusive pedagogy/andragogy standards as per [recommendation 40](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec40): Accessibility standards for teaching and learning, and throughout the academic journey of all students with disabilities and take into account the feedback received as per [recommendation 85](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec85): Usability of digital learning and technology environments.

**Timeline:** Within three years of the regulation being enacted.

**Recommendation 72: Equitable access to digital technology**

Regardless of the stage in the learning process, equitable access to resources, opportunities and services shall be made available to students with disabilities at no additional cost to the student.

The postsecondary institution shall take responsibility to provide transparent information and support to help navigation of funding options to support equitable access to digital technology for students with disabilities as per [recommendation 92](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec92): access to disability accommodation information.

**Timeline:** Within one year of the regulation being enacted.

**Recommendation 73: Identify and communicate digital learning & technology intentions**

Postsecondary institutions and educators shall identify, in their course syllabi, the digital technology and learning components as well as the course format needed to meet both (a) the academic and engagement expectations and (b) the essential requirements of the program of study and each course.

Where new technology is introduced after the start of class, class input shall be sought by the course instructor through a variety of options, including anonymous communication, and feedback related to accessibility will be addressed as a priority.

**Timeline:** Within one year of the regulation being enacted.

**Recommendation 74: Accessibility of the technology**

Postsecondary institutions shall include in their Digital Accessibility Plan a way to provide, communicate and reinforce with educators a mechanism to utilize the province-wide accessible procurement standards for educational resources for the technology procured noted in [recommendation 105](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec105).

**Timeline:** Within three years of the regulation being enacted.

**Recommendation 75: Removal of digital learning and technology barriers**

Postsecondary institutions shall include in the Digital Accessibility Plan the identification of, and removal of, systemic and environmental barriers that hinder a student’s digital learning. It should also include actions taken to address any outstanding persistent issues.

**Timeline:** Within three years of the regulation being enacted.

**Recommendation 76: Accessible educational collaboration**

Postsecondary institutions shall ensure the availability of accessible communication processes for educational collaboration not already covered by the customer service and the information and communications standards, including, but not limited to, student-to-student, student-to-educator, and student-to-internal and external partners.

**Timeline:** Within one year of the regulation being enacted.

**Recommendation 77: Digital inclusion in multi-year plan**

Postsecondary institutions shall report in their Multi-Year Accessibility Plan and the Annual Status Reports, how they have implemented their commitment of disability inclusion for all stages of the academic journey, including addressing any inequities to digital learning.

**Timeline:** Within 18 months of the regulation being enacted and no later than the next published Multi-Year Accessibility Plan.

**Theme 3: Accessible procurement support**

**Recommendation 78: Accessible digital technology lead (non-regulatory)**

1. Postsecondary institutions should appoint at least one high-level, institutional employee as the “accessible digital technology lead,” to support staff and faculty/educators in the procurement/acquisition/training of digital technologies for learning, content creation and student support.
	* if a separate “accessible digital technology lead” is not possible, then the accessibility lead for the institution must take on this role, which may involve additional training
2. The accessible digital technology lead should have:
	* qualifications in accessible technology core requirements
	* demonstrated knowledge and practical experience using assistive technology
	* strong understanding of accessibility and usability testing when auditing digital technologies with assistive technology
	* strong knowledge of procurement legal requirements
3. It should be the responsibility of the accessible digital technology lead to incorporate the province-wide Accessible Procurement Standards for Educational Resources (noted in [recommendation 105](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec105)) for all purchases and to ensure all accessibility features are enabled at the institutional level.

**Recommendation 79: Accessible digital technology lead reporting (non-regulatory)**

The Digital Accessibility Plan should report on the activities and accomplishments of the accessible digital technology lead in the Annual Status Report.

**Theme 4: Accessibility training/practice**

**Recommendation 80: Time to practice and learn digital learning and technology accessibility features**

Students shall be given the time to learn and practice the accessibility features of digital technologies before having to use them in learning.

**Timeline:** Within one year of the regulation being enacted.

**Recommendation 81: Mitigation of technology barriers**

To ensure effective mitigation of technology barriers, students with disabilities shall be offered accessible feedback, tracking and reporting mechanisms along with the contact information of the Ministry for Seniors and Accessibility compliance support services and technical services in the institution. The accessible digital technology lead shall include information from this feedback process in assessing the accessibility of the technologies procured/acquired. Systematic feedback shall also be obtained periodically from a representative sample of students with disabilities.

**Timeline:** Within one year of the regulation being enacted.

**Recommendation 82: Assessment methods**

1. Instructors shall include details of tools proposed to be used for assessment in the course syllabus.
2. When not known in advance, students with disabilities shall be given an opportunity to learn and practice any new digital technologies in a mutually agreed upon time frame, which considers the circumstances of the requester, and the urgency of the request, before using them in any assessments.

**Timeline:** a) within one year and b) three years of the regulation being enacted.

**Theme 5: Accessibility and inclusive pedagogy/andragogy**

**Recommendation 83: Accessibility of learning environment (non-regulatory)**

Postsecondary institutions should respect a learner’s disability-related needs around how they engage in their learning environment at any point in time, by providing flexible and equivalent ways to participate, interact and demonstrate their knowledge.

Postsecondary institutions are encouraged to continue to provide students with a range of directed and flexible choices in their daily learning environment (for example, in-person, online, synchronous or asynchronous).

**Recommendation 84: Barriers to digital technology in the learning environment**

When introducing new digital teaching and learning tools in the practice of inclusive teaching a) postsecondary institutions should ensure that they do not create additional barriers to access for students with disabilities and b) the accessible digital technology lead will consult where necessary the committee established in [recommendation 17](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec17): establish a committee.

**Timeline:** a) immediately and b) within three years of the regulation being enacted.

**Recommendation 85: Usability of digital learning and technology environments**

Postsecondary institutions shall ensure the usability of the digital learning environment for all students, including those with diverse information processing styles and sensory/physical attributes through established accessible feedback, tracking and reporting mechanisms as indicated in [recommendation 16](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec16): improving campus climate related to accessibility.

**Timeline:** Within three years of the regulation being enacted.

**Recommendation 86: Accessible content, resources, tools and processes**

Postsecondary institutions shall support educators by providing them with tools and processes, as well as by offering centralized resources (for example, people, budget, copyrights and other legal requirements, etc.) when sourcing, acquiring, producing and maintaining accessible content.

**Timeline:** Within one year of regulation being enacted.

**Recommendation 87: Support for educators and staff**

Postsecondary institutions shall include in their Digital Accessibility Plan how they intend to support educators and staff in the provision of accessible content for all programs and services.

**Timeline:** Within three years of regulation being enacted.

**Recommendation 88: Transparency process**

Postsecondary institutions shall include in their Digital Accessibility Plan an established process to ensure that all technologies acquired or purchased by educators and/or the institution abide by the province-wide accessible procurement standards for educational resources, and that accessibility and usability testing is conducted.

**Timeline:** Within three years of regulation being enacted.

**Recommendation 89: Accessible PDFs**

Postsecondary institutions shall provide all in-house created documents and required readings, when possible, under the *Copyright Act of Canada* and other legal agreements, in an accessible format. In the case of a PDF, this committee is recommending a phased approach:

* phase 1: postsecondary institutions shall use a PDF document only if it is accessible or an accessible alternative format is also simultaneously available when legally possible.
* phase 2: postsecondary institutions shall provide software and training for the creation of accessible PDFs in compliance with [recommendation 105](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec105): province-wide accessible procurement standards for educational resources. Following this date, any document provided as a PDF must meet this new standard. However, to phase in this requirement it is expected that postsecondary institutions continue to publish PDF-based digital content to be as accessible as their training and applications permit, even if an accessible alternative is provided. This will lessen any remediation costs if there is a need to go back and ensure that currently produced PDFs meet the above standard. This will also demonstrate the postsecondary institutions’ commitment and progress towards creating accessible PDFs.

**Timeline:** Phase 1: within one year of regulation being enacted. Phase 2: within three years of regulation being enacted.

**Barrier area 5: Organizational barriers**

The recommendations in this section are intended to reduce and ideally to eliminate systemic barriers by developing and implementing organizational policies and procedures that consider the rights and needs of all students with disabilities.

Our recommendations were informed by the collective professional or lived experience of the members of the Committee.

The following guiding principles helped to shape all recommendations in this section:

1. postsecondary institutions will create and maintain welcoming and accessible environments that facilitate full participation of all stakeholders
2. students with disabilities will experience barrier-free access to every aspect of their postsecondary experience, including exploration of postsecondary options through application and admissions processes, day-to-day curricular and co-curricular activities, and on to graduation

Our recommendations fall under the following five themes:

* admission and accommodation processes
* accessibility lens in institutional policies
* handling of accommodation requests
* service animals
* business continuity plans.

**Theme 1: Admission and accommodation processes**

**Recommendation 90: Transition supports and programming**

Postsecondary institutions shall seek feedback and recommendations from students with disabilities to help guide the development of transition programming and supports for students during their first year of postsecondary study and at each transition point in their academic journey (for example, experiential learning opportunities, co-op placement, internships, inter-institutional transfers, etc.).

**Timeline:** Within one year of regulation being enacted.

**Recommendation 91: Admissions processes**

Application processes, admission tests, other admission screening and any post-admission tests within the institution’s control shall meet the following accessibility standards:

* applications, application instructions and information about pre- and post-testing or screening processes will state that accommodations are available and the means by which to access those accommodations.
* all admissions documents, including applications and tests, will be readable using assistive technology and all multi-media materials related to the admissions process will be closed captioned, Ontario Human Rights Commission, Langue des signes Québécoise, Described and Integrated Described Video where possible and appropriate (French and English). Where these are not available, this will be noted, and alternative options will be offered.
* alternative options for accessibility will be readily available as required, including, but not limited to braille, large print texts, or reading information aloud to applicants/students.

**Timeline:** Within 18 months of regulation being enacted.

**Recommendation 92: Access to disability accommodation information**

Postsecondary institutions shall provide the public and all applicants for admission with easily located, timely and effective information in accessible formats about the available services, programs and supports for students with disabilities and how to access them. The information shall emphasize the need for students with disabilities to alert the postsecondary institution as early as possible about their disability accommodation needs.

Postsecondary institutions that utilize an interactive voice response system for receiving incoming phone calls related to admissions shall announce to all callers the institution’s commitment to accommodate students with disabilities and the number to press to get introductory information about how to seek such accommodation.

**Timeline:** Within six months of regulation being enacted.

**Recommendation 93: Documentation policies for academic accommodations**

The Ontario government shall consult postsecondary institutions, students with disabilities and other stakeholders to develop common documentation requirements for the provision of accommodations that are consistent with the OHRC [“Policy on Accessible Education for Students with Disabilities” (March 2018), section 8.7.](http://www.ohrc.on.ca/en/policy-accessible-education-students-disabilities)

Based on these requirements, postsecondary institutions shall develop, review, and update every 3 to 5 years in a collaborative manner, a consistent and clear set of policies and practices about the nature and extent of documentation required to establish eligibility for academic accommodation. These policies will be readily available in an accessible format on postsecondary institutions’ public facing websites and all other institutional communication channels.

**Timeline:** Within six months of regulation being enacted.

**Recommendation 94: Interim academic accommodations**

Postsecondary institutions shall establish a clear practice with respect to providing interim academic accommodations while waiting for further medical or psychological documentation before confirming the accommodations. The practice shall include a statement with respect to the maximum time that interim accommodations will be provided (for example, no less than one semester). The practice on providing interim academic accommodations shall be included in the broader policy on documentation requirements noted in [recommendation 93](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec93).

**Timeline:** Within six months of regulation being enacted.

**Recommendation 95: Full participation**

Postsecondary institutions shall ensure that students with disabilities are informed, as early as possible in a readily accessible and understandable way, of the institution’s duty to accommodate students with disabilities and the recognition of its duty to ensure that all academically qualified students with disabilities have the right to full participation and full inclusion in all the postsecondary institution’s programming, events, orientations and academic life.

**Timeline:** Within six months of regulation being enacted.

**Recommendation 96: Clear policies and procedures**

Postsecondary institutions, in consultation with students with disabilities and in collaboration with the Ontario government, Colleges Ontario and the Council of Ontario Universities shall develop, communicate and implement clear policies and procedures and best practice guidelines, that are demonstrably consistent with each other, outlining the process by which students with disabilities can be accommodated and get access to academically related learning activities, including, but not limited to:

* classrooms
* libraries
* common areas
* remote/ online learning \*
* tests/ examinations
* internships
* practical
* co-ops
* field placements
* apprenticeships
* work-integrated learning
* other experiential learning that is part of their academic program of study

\*The rapid expansion of online learning options has proven to reduce barriers for some students with disabilities; however, online and remote learning options are resources for accommodations only. It is important that online and remote options not become a substitute for the postsecondary institution’s responsibility to ensure that the in-person learning environment on campus is accessible.

These policies, procedures and guidelines should include considerations of disclosure, accommodation, student supervision and assessments. They should also focus on “soft” accessibility features, including but not limited to set up of pods, maximum number of persons in a room, accessible seating etc.

Institutions shall also develop policies and procedures related to priority access requests (for example, request for priority enrollment in a course, accessible housing placement, etc.) and ensure experiential learning partners are aware of the requirement to accommodate.

Note: Given that the Ontario government has mandated that all students should have opportunities for experiential learning, we recommend that the government increase the Accessibility Fund for Students with Disabilities to provide funding for accommodations in work integrated learning settings.

**Timeline:** Within two years of the regulation being enacted.

**Recommendation 97: Disability accommodation plans**

Postsecondary institutions shall establish and maintain an individualized, dignified and accessible procedure for students with disabilities to request and effectively take part in the development and implementation of plans for accommodating their disability-related needs.

* postsecondary institutions shall provide information about this procedure to students with disabilities in a readily accessible and timely manner.
* in accordance with the OHRC Policy on Accessible Education for Students with Disabilities (2018), students with disabilities shall be invited to actively participate in a joint in-person or virtual meeting with Student Accessibility Services to plan for their disability-related supports and accommodations. In the interest of the developmental process, students will be encouraged to participate on their own to assist them in developing their self-advocacy skills. However, if a student with disabilities deems it necessary, they may also decide to involve any support persons and professionals who can assist them in the accommodation planning meeting(s).

**Timeline:** Within six months of regulation being enacted.

**Recommendation 98: Disability accommodation caseload - expectations**

Student Accessibility Services staff shall carry a reasonable client load to ensure students will receive appropriate support and timely accommodation. To that end, we recommend that the Ministry of Colleges and Universities undertake a system-wide caseload study, considering the new and changing demands in the provision of education services (Ontario Human Rights Commission, 2018, p. 110), (for example, an increase in the number of students with mental health disabilities requested services) to address trends in required supports. The results of this system-wide study shall be shared with postsecondary institutions and will determine:

* if, and how, client load impacts the well-being, retention, and success of students with disabilities.
* current client load levels for SAS staff across the postsecondary sector in Ontario. what constitutes a reasonable client load for SAS staff providing services to students with disabilities.
* if the learning strategist and assistive technology positions developed as a result of the [Learning Opportunity Task Force (LOTF)](https://carleton.ca/fita/wp-content/uploads/Final-report-1997-2000.pdf) are still able to provide high-impact services and address barriers to learning based on the number of students with disabilities enrolled in services.
* the need for additional funding to the Accessibility Fund for Students with Disabilities to achieve reasonable client loads.
* how the findings of the [autism spectrum transition pilot projects](https://news.ontario.ca/en/bulletin/28365/more-supports-for-students-with-autism-spectrum-disorder) can be rolled out across all Ontario postsecondary institutions to manage staff client load and help students on the autism spectrum transition to postsecondary education and provide the resources and supports needed for students to build their skills.

**Timeline:** Within 18 months of regulation being enacted.

**Recommendation 99: Disability accommodation caseload - reporting**

Postsecondary institutions shall monitor and report on the caseload numbers of students with disabilities (as a ratio in comparison to SAS staff) in their Accessibility Fund for Students with Disabilities annual report.

**Timeline:** Within six months of regulation being enacted.

**Recommendation 100: Accessibility lens**

The Ministry for Seniors and Accessibility shall collaborate with relevant stakeholders to develop an accessibility lens for postsecondary institutions to use in all decision-making, including but not limited to, developing or revising institutional policies, procedures, processes, programs, social programs and activities.

Stakeholders shall include, but are not limited to:

* students with disabilities
* disability (accessibility) services offices at postsecondary institutions
* accessibility coordinating committees at postsecondary institutions
* College Committee on Disability Issues
* Inter-University Disability Issues Association
* National Educational Association of Disabled Students

All postsecondary institutions shall be required to adopt the use of this accessibility lens in decision-making as indicated above.

All postsecondary institutions shall update current *Accessibility for Ontarians with Disabilities Act, 2005*, training programs to include training for employees on using an accessibility lens in decision making as indicated in [recommendation 23](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec23).

The Ontario government shall support ongoing research and development of accessibility tools that effectively identify and remove barriers and publication of research results.

**Timeline:** Within two years of regulation being enacted.

**Recommendation 101: Report on training**

Postsecondary institutions shall report on their use of the accessibility lens and associated training in the Multi-Year Accessibility Plan and the Annual Status Reports.

**Timeline:** Within two years of regulation being enacted.

**Recommendation 102: Rights and needs of students with disabilities**

Postsecondary institutions shall consider the rights and needs of all students with disabilities, regardless of part-time/full-time status or level of study at the postsecondary institutions, when establishing all policies and procedures that could have an impact on students.

**Timeline:** Within one year of regulation being enacted.

**Recommendation 103: Alternate program pathways**

Postsecondary institutions shall consider and offer alternate pathways, (such as, program maps) for students with disabilities in academic and professional programs (all programs including certificate, diploma, degree and graduate education) who may need adjustments to time-to-completion deadlines, unless there are bona fide program requirements that would prevent the postsecondary institutions from offering those alternate pathways.

The process for considering the individual needs of students with disabilities with respect to alternate pathways must be communicated clearly and transparently at the pre-admission and admission stages.

These program maps shall be made available in accessible format to all prospective and current students, academic teams and program coordinators, and staff in the offices for students with disabilities.

**Timeline:** Within one year of regulation being enacted.

**Recommendation 104: Transparent policies and procedures**

All academic and administrative policies and procedures at postsecondary institutions pertaining to students shall be transparent in purpose, written in clear language, and readily accessible by students with disabilities.

**Timeline:** Within one year of regulation being enacted.

**Recommendation 105: Accessible procurement policies and procedures**

The Ontario government shall create a set of province-wide accessible procurement standards for educational resources to provide guidance to institutions with respect to accessibility principles in the purchase of educational equipment, educational technology, resources and other goods and services within the education context.

Procurement policies must ensure that all purchases made on behalf of postsecondary institutions are consistent with accessibility requirements covered in existing and future standards under the *Integrated Accessibility Standards Regulation* (for example, the [General Requirements](https://www.ontario.ca/laws/regulation/110191#BK5) and [Information and Communication Standards](https://www.ontario.ca/laws/regulation/110191#BK15)) and file reports on purchasing policy compliance as part of the overall reporting requirements. All faculty members and administrative staff must be clearly informed of their responsibilities under the existing [Ontario government accessibility laws on procurement](https://www.ontario.ca/page/accessibility-rules-procurement).

**Timeline:** Within two years of regulation being enacted.

**Recommendation 106: Information and communication standards’ procurement adoption for accessible technology**

We agree with and recommend the adoption of the Information & Communication Standards Review on [recommendation 14](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec14): Procurement for any digital technology purchased.

**Timeline:** Within one year of regulation being enacted.

**Recommendation 107: Follow the *Integrated Accessibility Standards Regulation*, O. Reg. 191/11 (IASR) procurement requirements**

Ensure any digital technology acquired otherwise for the purpose of learning must also respect the criteria set in the [Procurement section of the IASR General Requirements](https://www.ontario.ca/laws/regulation/110191) (O. Reg. 191/11, s. 5(1); O. Reg. 413/12, s. 4.(1))

**Timeline:** Within one year of regulation being enacted.

**Theme 3: Handling of accommodation requests**

**Recommendation 108: Review policies and procedures**

All policies, procedures and academic conflict resolution processes for accessibility-related disputes at postsecondary institutions shall be subject to regular review and revision every five years, in consultation with the postsecondary institution’s Accessibility Committee (as mentioned in [recommendation 17](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec17)) and representative students with disabilities at each postsecondary institution, to make sure they:

* are consistent with the *Accessibility for Ontarians with Disabilities Act, 2005*
* reflect the current state of human rights law and policy
* consider changes in organizational structures or resources
* address new human rights issues emerging within the organization
* continue to be effective.

**Timeline:** Within one year of regulation being enacted.

**Recommendation 109: Dispute resolution process outside of the classroom environment**

1. Where feasible, postsecondary institutions shall adopt an academic dispute resolution process for accessibility-related disputes that fall outside the classroom learning environment for example, in research labs, fieldwork or work integrated learning settings.
2. Postsecondary institutions may not be able to impose conflict resolution processes on settings outside of their control, for example, in provincial, federal, private sector, and international work placements. In such cases, the postsecondary institution shall work collaboratively and proactively with those settings to develop fair and appropriate conflict resolution processes
3. Postsecondary institutions shall proactively attempt to reach an agreement with third-party, external experiential learning settings, such that if there is no feasible dispute resolution process already in existence in these settings and the settings are outside of the postsecondary institution’s control (for example, in provincial, federal, private sector, and international work placements), the institution’s dispute resolution process will take precedence (refer to [recommendation 112](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec112)).
4. When an integrated dispute resolution process is established, it will be developed to include all types of disputes and to ensure that the process does not require adaptation if a disability is disclosed part way through the process. The integrated process should consider disability and involve disability experts as needed, but not treat students with disabilities as needing a separate process.
5. Ideally, all dispute resolution processes will be facilitated by professionals who are trained in (a) restorative practices, and (b) trauma-informed practices.

**Timeline:** Within one year of regulation being enacted.

**Theme 3: Handling of accommodation requests**

**Recommendation 110: Accessibility and accommodation coordinator/champion**

To further ensure the effective accommodation of students with disabilities and the entrenchment of accessibility at the front lines, each postsecondary institution shall implement the following:

1. In a small postsecondary institution, without an Accessibility Office, such as one that offers only one or two academic faculties, one senior employee within the organization who reports to the organization’s chief executive officer, dean or director, should be designated as that organization’s Accessibility and Accommodation Coordinator/Champion. Their responsibility is to serve as the one-stop point person for students with disabilities seeking accommodations. In cases where this individual does not have adequate background or training, this must be addressed by the postsecondary institution.
2. In a large postsecondary institution such as a college or university that has several faculties or programs, each faculty or program shall designate an Accessibility and Accommodation Coordinator/Champion with responsibilities to promote academic accommodation and accessibility within that faculty or program. In cases where these individuals do not have adequate background or training, this must be rectified by the postsecondary institution.
3. In large postsecondary institutions with more than one Accessibility and Accommodation Coordinator/Champion, all the Coordinators/ Champions shall establish a communication network so they can pool expertise and resources.

The accessibility committee at each postsecondary institution shall serve a coordinating role for all the designated accessibility coordinators/champions at the postsecondary institution.

The designated Accessibility and Accommodations Coordinators/Champions shall lead efforts at the organization towards incorporating accessibility into plans and decisions from the top down.

**Timeline:** Within one year of regulation being enacted.

**Recommendation 111: Refusal of disability accommodation requests**

If a postsecondary institution decides not to provide a requested disability accommodation, service, or support for a student, or to meet a disability-related need that the student identified, the postsecondary institution shall provide oral and written reasons for that refusal in a timely fashion, normally within 3-5 business days of formally communicating the refusal to the student.

**Timeline:** Within one year of regulation being enacted.

**Recommendation 112: Resolving disability accommodation refusal disputes**

Postsecondary institutions shall develop an effective and transparent mechanism to resolve disputes that arise in the accommodation process. The mechanism must be a respectful, non-adversarial internal dispute resolution review process for hearing, mediating and deciding on the concerns of students with disabilities. If a student disagrees with any aspect of the postsecondary institution’s decision on a request for accommodation or believes that the postsecondary institution has not provided supports or accommodations to which it had agreed, the student will be informed of the review and dispute resolution process. This tiered review process should include the following:

1. It should be very prompt and conducted expeditiously to ensure that students have the opportunity to complete their course(s) and/or academic program during the relevant enrolment period. Arrangements for a student's accommodations should be finalized as quickly as possible, so that the student’s needs are promptly met.
2. Proposed services, supports, or accommodations that the postsecondary institution is prepared to offer should not be withheld from a student pending a review. The student should not feel pressured not to seek a review, lest they be placed in a position of educational disadvantage during the review process.
3. The review process should be fair. The postsecondary institution should let the student know all issues or concerns with the student’s accommodation request and give the student an opportunity to voice their concerns.
4. The initial internal review and dispute resolution process should be led by a person or persons who are as independent and impartial as possible, including but not limited to, individuals from an office of human rights on campus. They should have expertise in accessible education of students with disabilities. Where possible, they should not have taken part in any of the earlier discussions or decisions at that postsecondary institution regarding the services, supports or accommodations for that student.
5. At the review, every effort will be made to mediate and resolve any disagreements between the student and the postsecondary institution. If the matter cannot be resolved by agreement through this internal process, there should be an option for a qualified mediator who is external to the postsecondary institution to be appointed at no charge to the student, to consider the review. Postsecondary institutions shall identify in advance a mechanism to engage an impartial dispute resolution mediator with expertise in disability and postsecondary education. We recommend that the Ministry of Colleges and Universities establish a list of qualified impartial mediators to assist with this process.
6. If the outcome of the review with an external mediator is that the postsecondary institution refuses the student’s request(s), verbal and written reasons should be given for the decision and the student shall be informed of the option to pursue their concern through the Ontario Human Rights Tribunal.
7. In recognition of the extra burden the appeal process places on students, a student should be able to take a voluntary leave from their studies during the dispute resolution process.
8. If a student is still engaged in an accommodations dispute resolution process after three quarters of the class has been completed, they should be offered a refund for the credit for which they needed accommodations.

**Timeline:** Within two years of regulation being enacted.

**Theme 4: Service animals**

**Recommendation 113: Service animal definition for postsecondary institutions**

1. The postsecondary institutions shall remain consistent with [accessible customer service standards](https://www.ontario.ca/laws/regulation/110191#BK149) on the use and definition of service animals and refrain from using the term “support animal”. Based on the current definition, an animal is a service animal provided that “the person with a disability provides documentation from one of nine regulated health professionals confirming that the person requires the animal for reasons relating to the disability”. This includes providing support for people with disabilities.
2. On the next review of the customer service standards, the government shall provide reviewers with this recommendation and request greater clarification to be provided on the definition of service and support animals and the respective roles each play.

**Timeline:** a) Immediately upon regulation being enacted and b) to be included as part of the review of the next customer service standards.

**Recommendation 114: Service animals' policies and procedures**

Postsecondary institutions shall establish clear policies and procedures with respect to service animals. These policies and procedures need to be readily available in an accessible format to all students with disabilities. Where a policy exists that addresses pets on campus, the service animal policy shall supersede such a policy to ensure students with disabilities’ full access and integration on campus.

Student housing that is under postsecondary institutions’ control shall post the policy and make public the process for use of service animals in student housing. In scenarios where student housing is controlled by a third-party, postsecondary institutions should work with these third parties to ensure policies are clearly posted.

**Timeline:** Within one year of regulation being enacted.

**Recommendation 115: Business continuity plans**

Postsecondary institutions shall create and/or update business continuity plans with prepared responses to potential disruptions to service delivery, building evacuations, etc., that are dignified and independent for persons with disabilities. Such disruptions can occur due to emergency response situations, labour disruptions, public health restrictions or other disruptions to student education and services. For example, postsecondary institutions may need to collaborate with public transportation services to help ensure that students with disabilities have access to the campus during a labour disruption where picket lines are in force. Postsecondary institutions shall mandate that clear accessible resources, teaching strategies and plans for continuity of support services be developed for use in the case of a sudden change to the mode of education, due to unexpected disruptions such as those noted above.

These resources will be made available to all teaching faculty and instructors, including but not limited to partial load instructors, part-time and sessional faculty, lab demonstrators, and teaching assistants, as part of ensuring that accessibility preparedness is made a priority when planning for emergency situations.

The development of contingency plans must include an expert in accessibility to identify barriers throughout the planning. The plan must incorporate inclusive design principles and include mechanisms to maintain support services for students with disabilities if classes are held during a disruption to standard program delivery. Postsecondary institutions must use an accessibility lens when planning for resumption of studies to ensure that the needs of students with disabilities are considered at both the start and end of disruptions.

**Timeline:** Within one year of regulation being enacted and updated every three years.

**Recommendation 116: Disruption impacts**

If students with disabilities need to withdraw from their courses to take a disability-related leave, including due to disruptions of the sort noted in [recommendation 115](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec115), postsecondary institutions shall:

* establish and communicate a transparent process for students with disabilities (part-time and full-time) that permits students to suspend their studies and to resume their studies after a disruption-related absence
* ensure that any policy related to voluntary or involuntary leaves is reviewed to ensure compliance with the *Ontario Human Rights Code*.
* not require students to reapply to the institution or their program to resume their studies
* facilitate alternate pathways for students with disabilities, both full-time and part-time, to complete their studies
* not charge an application fee for students with disabilities to resume their studies after a disruption-related absence

**Timeline:** Within one year of regulation being enacted.

**Barrier area 6: Social realms, campus life**

Campus life involves a wide array of activities and opportunities for all students and provides an additional layer of learning and experience within the postsecondary setting. The "student experience" gained through participating in campus life is now an important piece of a student's skill development and employment outcomes.

Students with disabilities often cannot engage with campus life, in leadership roles that can influence campus decisions, or are restricted in their choice of educational institutions. Additionally, students with disabilities lack accessible, meaningful and predictable programming that facilitates their active participation in the social realm of campus life.

Recommendations in this section are focused on identifying and removing barriers that hinder students with disabilities from accessing and successfully engaging with campus life outside of the classroom. We specifically focus on accessible events and off-campus activities, student leadership and student engagement. Transition literature, government resources and consultation with provincial colleagues and stakeholders all support the development of recommendations.

We offer recommendations in three key areas:

* accessibility supports
* leadership
* social belonging.

**Theme 1: Accessibility supports**

**Recommendation 117: Institution funding for accessible supports**

Postsecondary institutions shall fund accessibility supports, such as sign language interpreting and attendant services, for students with disabilities to enable their access and participation in leadership roles on governance bodies and on-campus, non-academic activities.

**Timeline:** Within two years of regulation being enacted.

**Recommendation 118: Accessible information about supports**

Postsecondary institutions shall maintain accessible information about on- and off-campus accessibility supports and service providers, such as attendant services, sign language interpreters, real-time captioning, orientation and mobility trainers for individuals with vision loss.

**Timeline:** Within one year of regulation being enacted.

**Recommendation 119: Off-campus services**

Postsecondary institutions will identify units or positions responsible for facilitating institutional contact with off-campus service providers, such as those listed in [recommendation 118](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec118).

**Timeline:** Within one year of regulation being enacted.

**Recommendation 120: Attendant services**

The Ontario government, in consultation with accessibility stakeholders, shall develop a plan to increase the availability and quality of attendant services for postsecondary students with disabilities.

**Timeline:** Within one year of regulation being enacted.

**Theme 2: Leadership**

**Recommendation 121: Governance bodies**

Postsecondary institutions, student governments, and student unions/societies shall adopt policies and procedures that proactively seek to engage and appoint full- and part-time students with disabilities to their governance bodies.

**Timeline:** Within two years of regulation being enacted.

**Recommendation 122: Collect aggregate data**

Postsecondary institutions, student governments, and student unions/societies shall collect equity representation aggregate data on rates of participation by students with disabilities on all governance bodies.

**Timeline:** Within two years of regulation being enacted.

**Recommendation 123: Report results**

Postsecondary institutions, student governments and student unions/societies shall report the results of [recommendations 121](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec121) and [122](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec122) in the multi-year accessibility report/plan and the Annual Status Reports, including planned adjustments to enhance the representation of students with disabilities on governance bodies.

**Timeline:** Within two years of regulation being enacted.

**Recommendation 124: Accessible sports and recreation programming (non-regulatory)**

The Ministry of Colleges and Universities should work with postsecondary institutions and student governments, student unions/societies, as well as, but not limited to, provincial and national professional sport groups for persons with disabilities, to create accessible sports and recreation programming to engage postsecondary students with disabilities. Sports organizations could include Canadian Sport Institute Ontario.

**Theme 3: Social belonging**

**Recommendation 125: Enhance student life and satisfaction**

Using the results of measures indicated in [recommendation 123](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec123), postsecondary institutions shall develop new programming or improve existing programming to enhance student life satisfaction for students with disabilities.

**Timeline:** Within three years of regulation being enacted.

**Recommendation 126: Student activity fees**

Postsecondary institutions that transfer student activity fees to incorporated student government and/or student societies shall require these bodies to report to the institution administration on their compliance with the *Accessibility for Ontarians with Disabilities Act, 2005*, and its regulations in areas of student governance, clubs and groups, activities and events.

**Timeline:** Within two years of regulation being enacted.

**Barrier area 7: Physical and architectural barriers**

Recommendations in this section are focused on identifying and addressing barriers to accessibility in the built environment of postsecondary institutions. We took an expansive view of the “built environment”, acknowledging that access should not be limited to buildings but include all the human-made environments in which we live, work and study on a routine basis. In developing our recommendations, we focused on building on existing standards already in use at many postsecondary institutions and shaped our recommendations to address any gaps.

Our recommendations were developed by individuals with lived experience of barriers to the built environment, and those with oversight of providing accessible services and addressing systemic barriers in diverse postsecondary settings. These experiences helped us begin our work from the understanding that our institutions are not universally accessible.

We organized our recommendations across five areas:

* technical requirements – specifications for creating an accessible built environment
* scope – where these standards apply
* maintenance and upkeep – ensuring what is accessible stays accessible
* planning, operations, decision-making, oversight – creating transparency, disability-informed decisions and sustained changes
* awareness, user experience and transparency – improvement projects, signage, training for architects.

In focussing on these areas, we sought to bring some clarity to the legislative environment surrounding accessibility standards, to proactively address barriers, and to meaningfully embed the lived experiences of persons with disabilities in a way that honours intersectional identities. By taking this approach we sought to assist postsecondary institutions so that they could avoid mistakes and significant costs in the future, and also avoid creating long-lasting and hugely detrimental impacts that are difficult to fix.

**Theme 1: Technical requirements**

**Recommendation 127: Minimum accessibility technical specifications**

The government shall develop minimum accessibility standards for the built environment of postsecondary institutions, consisting of the technical specifications including, but not limited to, those set out in the:

1. [OCADU Facility Accessibility Design Standards, 2017](https://www.ocadu.ca/news/ocad-u-announces-adoption-facility-accessibility-design-standards-fads-all-construction-and)
2. [The design of public spaces standards](https://www.ontario.ca/laws/regulation/110191#BK91)
3. [Checklist for Making Science Labs Accessible for Students with Disabilities](https://accessiblecampus.ca/tools-resources/educators-tool-kit/accessible-science-laboratories/checklist-for-making-science-labs-accessible-for-students-with-disabilities/), 2014
4. [CNIB Clearing Our Path Guidelines](https://cnib.ca/en/sight-loss-info/clearing-our-path?region=on)

These requirements should be revised to address considerations for service animals, neurodiversity, environmental sensitivities (for example, air quality, chemical sensitivity, noise and light), and mental wellness. In order to appropriately incorporate these considerations, such standards should be co-designed with persons with lived of experience of these disabilities and organizations that serve their interest. Where spaces are being repurposed, organizations must consider maintaining barrier-free paths of travel and meet accessible design standards.

**Timeline:** Within one year of regulation being enacted.

**Recommendation 128: Adopt minimum accessibility technical specifications**

Postsecondary institutions under these standards shall adopt the minimum accessibility technical specifications for the built environment.

**Timeline:** Within 18 months of regulation being enacted.

**Recommendation 129: Inclusive design principles in policies, practices and procedures**

Postsecondary institutions shall incorporate robust inclusive design principles into all policies, practices and procedures which relate to the existing built environment and any future development or renovation initiatives. Such a process will involve a thorough review of these policies, practices and procedures to identify and remove any ableist assumptions, and then rebuild these policies with inclusive design principles at the core. Once that has been done, the use of inclusive design principles through the application of an accessibility lens will be a regular part of any built environment policy review process.

**Timeline:** Within one year of regulation being enacted.

**Recommendation 130: New built environment accessibility standards**

The government shall fully implement [recommendation 8](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec8) of the [2019 Onley review](https://www.ontario.ca/page/2019-legislative-review-accessibility-ontarians-disabilities-act-2005): “Develop new comprehensive Built Environment accessibility standards” which shall entail:

1. reviewing and revising the 2013 Building Code amendments for new construction and major renovations
2. reviewing and revising the design of public spaces standards
3. creating new standards that apply to retrofitting buildings
4. reporting on harmonization process outlined in the “Advancing Accessibility in Ontario” cross-government framework

**Timeline:** In line with planned updates to built environment, including the Ontario Building Code and the Design for Public Spaces Standards.

**Theme 2: Scope**

**Recommendation 131: Upholding accessibility standards in third-party controlled spaces**

Postsecondary institutions shall ensure the accessibility technical specifications for the built environment, as set out in [recommendation 127](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec127) are upheld in buildings, venues and spaces the institution uses, leases or is affiliated with, but which may be owned, managed or operated by other organizations or entities. Postsecondary institutions shall review existing agreements and include accessibility requirements in all future agreements. Postsecondary institutions have a duty to inquire about the accessibility of such built environments. If the built environment does not meet these standards, postsecondary institutions shall collaborate with the organizations or entities which own, manage or operate the built environment(s) in question in order to bring the built environment(s) into compliance with the standards.

**Timeline:** Within 18 months of regulation being enacted.

**Recommendation 132: Developing guidelines for accessibility standards in third-party controlled spaces (non-regulatory)**

We propose that the Ontario government collaborate with Colleges Ontario and the Council of Ontario Universities to develop guidelines on the implementation of [recommendation 132](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec132): Developing guidelines for accessibility standards in third-party131. The guidelines shall cover:

* who is responsible in the organizations for upholding the requirements
* how organizations can audit the accessibility of such spaces under [recommendation 131](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec131)
* methods and mechanisms for resolving conflicts between parties.

**Recommendation 133: Accessibility of non-educational services on campus (non-regulatory)**

The Postsecondary Education Accessibility Standards for the built environment may include all spaces where non-educational services and activities take place on the postsecondary institution’s campus (for example, health services, ceremonies, civic engagement, recreational activities in common areas such as student residences).

**Recommendation 134: Experiential learning off campus**

The Postsecondary Education Accessibility Standards for the built environment shall be applied to experiential learning activities that do not take place on the postsecondary institution’s campus (for example, placement host sites). Postsecondary institutions shall incorporate the technical specifications referred to in [recommendation 127](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec127) into the criteria and process of finding experiential learning activities, such as co-op, apprenticeships or work-integrated learning placements.

**Timeline:** Within two years of regulation being enacted.

**Recommendation 135: Prioritizing accessible experiential learning**

Postsecondary institutions shall proactively seek, prioritize and protect accessible experiential learning activities for students with disabilities.

**Timeline:** Within 18 months of regulation being enacted.

**Recommendation 136: Resources to support experiential learning (non-regulatory)**

In collaboration with postsecondary institutions, the Ontario government may develop audit tools to assess the accessibility of potential experiential learning sites. Funds should be made available by the government for potential hosting sites to upgrade their facilities based on the results of any audit.

**Theme 3: Maintenance and upkeep**

**Recommendation 137: Procure inventory**

Postsecondary institutions shall audit their built environment and identify all the features that are essential to ensuring and promoting safe, accessible environments. From this review, the institution shall revise maintenance plans and policies to prioritize the timely maintenance and repair of these features to ensure their ongoing use. Such features shall be defined as per the Access and Circulation and Washroom sections of [OCADU Facility Accessibility Design Standards, 2017](https://www.ocadu.ca/news/ocad-u-announces-adoption-facility-accessibility-design-standards-fads-all-construction-and) referred to in [recommendation 127](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec127). Examples of these features include, but are not limited to:

* elevators
* ramps
* lifts
* automatic or push-button door operators
* lighting controls
* visual fire alarms.

Maintenance plans and policies should also include clear expectations for maintaining access to or operation of these features in case of weather-related events (for example, snow, ice, flooding), including reasonable response times and prioritized clearing.

**Timeline:** Within three years of regulation being enacted.

**Recommendation 138: Track and report spending on maintenance and upkeep**

Postsecondary institutions shall track and report the historical (up to five years prior to compliance date for this recommendation) and current spending on the maintenance and upkeep of accessibility features, as defined in [recommendation 137](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec137). This shall be included in all existing internal maintenance reports and be reported on an ongoing basis, as part of existing provincial space management reporting systems (for example, Council of Ontario Universities Committee on Space Standards and Reporting).

**Timeline:** Within three years of regulation being enacted.

**Recommendation 139: Funding maintenance and upkeep**

Postsecondary institutions shall implement the accessibility lens to consider the impacts of decision-making related to budgets on students with disabilities (for example, if a building is not upgraded, how would this impact students with disabilities or how would a reduction of the staff complement for snow removal impact students with disabilities navigating the campus, etc.). Additionally, the Ontario government shall allocate funding to address ongoing efforts to improve physical accessibility and maintenance.

Based on the reports and data received as part of [recommendation 138](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec138), the Ontario government shall develop expectations for postsecondary institutions to protect a minimum percentage of their facility repair and maintenance budget in order to dedicate it to the maintenance and upkeep of the accessibility features defined in [recommendation 137](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec137).

The Ontario government shall also develop expectations for postsecondary institutions to protect a portion of their project budget to contribute to the ongoing operation and maintenance of the planned accessibility features when planning and building new environment or facility improvement projects. This portion shall be used as a contingency in the event that these accessibility features are non-operational or fail to meet these standards prior to their anticipated maintenance schedule.

**Timeline:** Within three years of regulation being enacted.

**Recommendation 140: Procure inventory**

Postsecondary institutions shall procure and have a standing inventory of commonly required maintenance and repair materials for accessibility features. Having materials readily available reduces the length of time for replacement or repair if the feature may become, or is, unsafe to use.

**Timeline:** Within 18 months of regulation being enacted.

**Recommendation 141: Accessibility metrics**

Postsecondary institutions shall develop or incorporate into existing monitoring and response frameworks, metrics specific to the features identified under [recommendation 137](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec137), as essential to ensuring and promoting accessible environments. Such a framework, to include reasonable response times, shall be developed in collaboration with the consulting committee referred to in [recommendation 17](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec17) and consider any responses received as part of [recommendation 154](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec154).

**Timeline:** Within three years of regulation being enacted.

**Theme 4: Planning, operations, decision-making and oversight**

**Recommendation 142: Identify barriers and provide accommodations**

Postsecondary institutions shall proactively identify barriers in the built environment that cannot be removed or minimized due to legal, geographic or technical restrictions. For such barriers, institutions shall identify and prepare accommodations that can be readily accessed by institutional community members and visitors or produce an Equally Effective Access Plan. These accommodations must provide safe, equitable and equivalent access to persons with disabilities in such a way that maximizes accessibility. Having an Equally Effective Access Plan does not exempt organizations from the responsibility to arrange individualized accommodations for students.

**Timeline:** Within two years of regulation being enacted.

**Recommendation 143: Renovation, redesign, construction projects**

Whenever a postsecondary institution is preparing to undertake a renovation, redesign or construction project, they shall specifically include expectations for the fulfilment of the accessibility standards (as per [recommendation 127](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec127)). This shall be included in all stages of the process, including, but not limited to, Request for Proposals tender, contracting, project management and feedback, and approvals.

**Timeline:** Within two years of regulation being enacted.

**Recommendation 144: Accessibility design experts and consultants**

For any proposed building or construction projects, built environment accessibility consultants or firms shall be engaged to review the project and to conduct accessibility audits for compliance to accessibility standards (per [recommendation 127](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec127)). The results and findings shall be reviewed by the postsecondary institution’s accessibility committee (per [recommendation 17](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec17)).

1. the Ontario government shall consult with accessible design experts, persons with disabilities and postsecondary institutions to devise a repository of accessible design consultants, as well as a rubric for how to choose them for design projects. In fulfilling this recommendation, we also propose that the creation of the repository and rubric take into consideration reducing the cost implications to postsecondary institutions from this recommendation and [recommendation 145](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec145).

**Timeline:** Within two years of regulation being enacted.

**Recommendation 145: Construction projects reports**

For any proposed new building or significantly renovated projects, built environment accessibility consultants shall track the accessibility deliverables and potential accessibility barriers (as per the criteria in the minimum accessibility technical specifications) in the course of the project and make reports of the findings. These reports shall be provided to the postsecondary institution, members of the institutional oversight/governance process and members of the community for comment. These reports shall receive dedicated time for members of the institutional oversight/governance process to discuss and scrutinize the findings of the report at each stage of the process.

**Timeline:** Within two years of regulation being enacted.

**Recommendation 146: Construction projects tax credit (non-regulatory)**

We propose the Ontario government develop an enhanced tax credit that is available to private donors to be applied to donations that fund a postsecondary institution’s renovation, redesign or construction project that is fully accessible under these standards. Postsecondary institutions may be eligible for this enhanced tax credit for diverting a private bequest towards renovation, redesign or construction projects that are fully accessible under these standards.

**Recommendation 147: Institution’s capital request expenditure**

The Ontario government shall implement measures to identify and prioritize the provision and disbursement of public funds to any postsecondary institution’s capital request expenditure for renovations, redesigns or construction projects which comply with these standards or which bring their built environment into compliance with these standards. The postsecondary institution shall provide documentation to the Ontario government that shows the accessibility standards (per [recommendation 127](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec127)) have been met throughout the project.

**Timeline:** Within two years of regulation being enacted.

**Recommendation 148: The role of the consultation committee**

The consultation committee referred to in [recommendation 17](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec17) shall be engaged and regularly consulted throughout the institution’s general operations and management process to provide oversight and advice to aid the institution’s management and upkeep of the built environment. The input of this committee, including the responses to their input, shall be included in all departmental reporting structures.

**Timeline:** Within two years of regulation being enacted.

**Recommendation 149: Procuring contractors and vendors**

Whenever the postsecondary institution is preparing to procure or renew the services of contractors, vendors, independent agents, etc., for the maintenance of the built environment, the institution shall specifically include expectations for the fulfilment of the accessibility standards. This shall be included in all stages of the process including, but not limited to, tender, contracting, project management and feedback, approvals and performance assessments.

**Timeline:** Within two years of regulation being enacted.

**Theme 5: Awareness, user experience and transparency**

**Recommendation 150: Revised policies and facility accessibility design standards (non-regulatory)**

Colleges Ontario and the Council of Ontario Universities should support their member organizations to develop revised policies and facility accessibility design standards that reflect and align with the new minimum accessibility technical specifications (as per [recommendation 127](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec127)).

**Recommendation 151: Training for new and current built environment professionals (non-regulatory)**

The government should work with the Ontario Association of Architects, the Royal Architectural Institute of Canada, the Ontario Association of Landscape Architects, the Canadian Society of Landscape Architects and the Association of Registered Interior Designers of Ontario to develop and provide online and in-person training to newly and currently certified architects and designers about understanding and incorporating the new minimum accessibility technical specifications into designs.

**Recommendation 152: Criteria for built environment professionals (non-regulatory)**

The Ontario Association of Architects, the Royal Architectural Institute of Canada, the Ontario Association of Landscape Designers, the Canadian Society of Landscape Architects, and the Association of Registered Interior Designers of Ontario should update all their criteria for membership, certification processes and practice acts, no matter what the pathway, to incorporate competencies in accessibility technical specifications and inclusive design principles.

**Recommendation 153: Proof of training (non-regulatory)**

As part of their procurement processes for tendering architectural and any other built environment services, postsecondary institutions should request proof of completion of the training identified in [recommendation 151](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec151) (or some other proof of competency in the interim). Such proof should be provided for any professional working with the institution by the vendor for which they are working at the time of bidding for a project. Other proof of competency may include successful completion of the following:

1. Royal Architectural Society of Canada – [Introduction to Successful Accessible Design](http://raic.org/AccessibleDesign)
2. International Association of Accessibility Professionals – [Certified Professional in Accessible Built Environments](https://www.accessibilityassociation.org/cpabeoverview)

**Recommendation 154: Notice of temporary accessibility barriers**

Postsecondary institutions shall provide up-to-date information about any temporary accessibility barriers or service disruptions impacting the accessibility of the built environment. These notifications shall be provided both through institution-specific sources (such as temporary signage or alerts posted to student learning portals or a website) and broader public mapping services (for example, Google Maps). Such notifications shall clearly identify what the barrier is, where it is, the nearest accessible route/service/facility, date and duration of the disruption, and contact information for an ombudsperson or other complaint resolution mechanism. Such notifications must be provided in a timely manner and be in an accessible format. A feedback mechanism for community members to report issues outlined in this recommendation should be clearly outlined.

**Timeline:** Within Within six months of regulation being enacted.

**Recommendation 155: Accessibility during construction**

In collaboration with the consultation committee (as per [recommendation 17](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec17)) postsecondary institutions shall proactively devise plans and processes to maintain access during construction projects, both large and small. In addition to the notifications required in this recommendation, such plans and processes must seek to maintain accessibility during construction and, wherever possible, provide an alternative and equal means of access. Once devised, these plans and processes shall be made publicly available in an accessible format. Any disruption to accessibility caused by construction must be for as short a duration as feasibly possible.

**Timeline:** Within two years of regulation being enacted.

**Recommendation 156: Signage and wayfinding**

Postsecondary institutions shall revise and, where necessary, add more accessible signage and wayfinding resources that make explicitly clear the availability of accessibility features and barrier-free paths of travel in the built environment in order to facilitate independent navigation and wayfinding. Such information must be prominent and conform with accessibility standards related to information and communications, and the signage standards within [recommendation 127](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec127). These wayfinding resources include, but are not limited to:

1. exterior signage and maps (for example, direction posts)
2. interior signage and maps (for example, wing layout)
3. institutional websites (for example, campus maps)
4. temporary signage
5. emergency signage
6. guided campus tours.

Where appropriate, wayfinding resources should also include any known accessibility barriers and provide alternative access information.

**Timeline:** Within 18 months of regulation being enacted.

**Recommendation 157: Review the accessibility of the built environment**

Postsecondary institutions shall routinely review the accessibility of the built environment. This review will be co-designed with the committee per [recommendation 17](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec17) and respond to issues identified in feedback received as part of [recommendation 154](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec154) and any other relevant feedback reports. The results of the review shall inform planning for concrete next steps for meaningful action. The plan should be reported and updated in line with the institutional Multi-Year Accessibility Plan and made publicly available.

**Timeline:** Within three years of regulation being enacted.

**Recommendation 158: System-wide improvement plan data**

The Ontario government shall gather and collate the improvement plan data from postsecondary institutions in order to monitor and measure postsecondary system-wide accessibility. Such data should be made available to the public and reported on a frequent basis.

**Timeline:** Within three years of regulation being enacted.

**Recommendation 159: Ongoing commitment to accessibility improvement projects**

Each year, postsecondary institutions shall plan, design and implement projects to improve accessibility in the built environment, so that it complies with the standards. The decisions shall be based on areas identified by the plan outlined in [recommendation 157](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec157). Any priority-setting and implementation shall be done in consultation with the committee established per [recommendation 17](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec17). Postsecondary institutions shall report in the Annual Status Reports on the projects they have undertaken as part of their Multi-Year Accessibility Plan and provide written explanation, should undertaking projects in a given year not be practicable.

**Timeline:** Within three years of regulation being enacted.

**Recommendation 160: Promote compliance with the *Accessibility for Ontarians with Disabilities Act, 2005*, and *Ontario Building Code* (non-regulatory)**

We encourage the Ontario government to launch initiatives to raise the public profile and promote compliance with the *Accessibility for Ontarians with Disabilities Act, 2005*, and [*Ontario Building Code*](https://www.ontario.ca/laws/statute/92b23) accessibility standards.

**Barrier area 8: Financial barriers**

For students with disabilities, the financial barriers they experience are a web of complex systemic issues which can take many forms. In our discussions, we recognized that some financial barriers fell outside the scope of our mandate (for example, Ontario Student Assistance Program reform), and chose to focus our recommendations on four key themes:

* cost differentials
* transparency
* graduate student funding
* intersectionality.

These areas were chosen to do two things: first, to “spotlight” issues (such as graduate student barriers and intersectionality) that are often not addressed in conversations around financial barriers and, second, to reduce the manifestation of inequity or potentially exclusionary elements of policy and practice.

**Theme 1: Cost differentials**

**Recommendation 161: Definition of “part-time students with disabilities”**

Postsecondary institutions shall adopt the provincial financial aid definition of full-time and part-time status discussed during the 2016 Ontario Student Assistance Program reform consultation for students with disabilities for the purposes of accessing financial aid. The definition is included as a reference: a student with a permanent or temporary disability who is enrolled in 40 per cent or more of a full course load will be considered a full-time student for the purposes of applying to the Ontario Student Assistance Program.

**Timeline:** Within one year of the regulation being enacted.

**Recommendation 162: Application of “part-time students with disabilities” definition**

Postsecondary institutions shall:

1. create a flexible and confidential process within the institution for disbursement of funds in a timely manner to allow part-time students with disabilities to gain access to institutional scholarships, bursaries, etc. that are currently accessed by full-time students.
2. regularly measure the effectiveness of these practices by assessing their impact on retention rates and the student experience of students with disabilities.

**Timeline:** a) within one and b) two years of the regulation being enacted.

**Recommendation 163: Higher Education Quality Council of Ontario recommendations – eligibilities, formulae and assessments**

We agree with the recommendations in the Higher Education Quality Council of Ontario’s [Assessment of Debt Load and Financial Barriers Affecting Students with Disabilities in Canadian Postsecondary Education - Ontario Report](https://heqco.ca/pub/assessment-of-debt-load-and-financial-barriers-affecting-students-with-disabilities-in-canadian-postsecondary-education-ontario-report/) (2011), and recommend that:

1. postsecondary institutions shall reconsider eligibility requirements for institutionally based financial aid specific to students with disabilities, so that students with disabilities remain eligible even when they are not eligible for basic provincial or federal assistance (for example, Ontario Student Assistance Program).
2. where they do not already exist, postsecondary institutions shall adopt eligibility assessments that account for the full impact of a student’s disability on their financial situation when applying for institutional funding.
3. the Ontario government and postsecondary institutions shall collaborate to improve information sources regarding government subsidies for Indigenous and international students with disabilities, disability assessments, tax credits and other resources for students with disabilities.
4. where it does not already occur within institutions, postsecondary institutions shall ensure that students with disabilities do not have to pay out of pocket for assessment costs or infrastructure costs associated with disability assessments.

**Timeline:** Within three years of the regulation being enacted.

**Recommendation 164: Supplemental health insurance (non-regulatory)**

Student governments, unions and societies should create and implement a mechanism to allow part-time students with disabilities to opt into the full-time supplemental health insurance plan to allow students to have the same level of access as full-time students.

**Recommendation 165: Review of supplemental health insurance plans (non-regulatory)**

Student governments, unions and societies should review their health plans to ensure that they include:

* access to drug/pharmacy/durable goods benefits (for example, medical devices, vision, hearing and dental care)
* access to a campus-based pharmacy, where applicable
* specialist medical and/or rehabilitation care for various conditions, which are not otherwise covered by OHIP (for example, auditory skills training, physiotherapy, speech therapy)
* access to off-campus mental health care services (for example, psychotherapy services) not provided by the postsecondary institution.

**Recommendation 166: Differentials in policies and practices**

The Ontario government and institutional financial aid administrators, in consultation with accessibility service providers and students with disabilities, shall:

1. review existing practices to determine whether differentials exist that disadvantage students with disabilities.
2. ensure all financial aid policies and practices address gaps and differentials identified in part a) above.
3. transparently account for disability-related expenses in financial aid assessments and processes.
4. implement a process to allow later payment of tuition fees caused by delays in government funding for disability-related needs without penalty of late payment fees.
5. collaborate with appropriate stakeholder groups to regularly measure the effectiveness of practices developed in response to b), c) and d) above on student retention and quality of experience of students with disabilities in postsecondary education.

**Timeline:** a) within one year, (b-d) within two years, and e) beginning three years after the regulation being enacted.

**Recommendation 167: Costs of accessing disability documentation**

As noted by the Ontario Human Rights Commission (2018), education providers must bear the cost of any required medical information or documentation (for example, the education provider should pay for doctors’ notes, assessments, letters setting out accommodation needs, etc.).

To remove barriers caused by delays in the provision of accommodations and supports due to a student’s inability to pay for documentation, colleges and universities shall reimburse students with disabilities, including international students with disabilities, the costs of accessing documentation to substantiate their need for academic accommodation and supports, if other funding sources are unavailable (for example, Ontario Student Assistance Program, Insurance Plan, etc.) and where this has been agreed upon by the institution and student in advance.

**Timeline:** Within one year of the regulation being enacted.

**Recommendation 168: Additional institutional fees**

Postsecondary institutions shall:

1. review existing institutional fee structures and policies in order to ensure that they are not profiting from the lack of choices and options that students with disabilities experience in paying for institutional services.
2. where necessary, revise and/or adopt policies and practices to ensure that students with disabilities shall not be charged institutional fees incurred due to incidents related to a disability. For example, a student who needs to defer exams due to hospitalization should not be charged an exam administration fee to defer the exams.

**Timeline:** a) within 18 months of the regulation being enacted; and b) within three years of the regulation being enacted.

**Recommendation 169: Housing fees**

Postsecondary institutions’ Student Housing and Residences Offices shall create a fee schedule that considers disability-related needs related to room assignments. The policy must ensure students are not charged premium rates for costs incurred resulting from a disability (such as, single rooms versus double rooms fees, room for attendant).

**Timeline:** Within one year of the regulation being enacted.

**Recommendation 170: Parking Fees**

Postsecondary institutions shall create a parking fee schedule that does not charge persons with ministry-issued disabled parking permits premium rates for premium parking locations if students are required to park in these locations due to a disability (for example, underground parking especially in the winter, disabled parking located adjacent to the building).

**Timeline:** Within one year of the regulation being enacted.

**Recommendation 171: Ontario Student Assistance Program (non-regulatory)**

The Ontario government should respond to the 2016 Ontario Student Assistance Program Reform Consultation, which included changing the qualification to the following:

* a student with a permanent or temporary disability who is enrolled in 40 per cent or more of a full course load will be considered a full-time student for the purposes of applying through the Ontario Student Assistance Program Application for Full-Time Studies
* review part-time percentage for eligibility

**Recommendation 172: Time limit on Ontario Student Assistance Program funding (non-regulatory)**

The Ontario government should consult with relevant stakeholders, including students with disabilities and the Canada Student Loans Program, and undertake an in-depth review of the ten-year Ontario Student Assistance Program funding time limit, as students with disabilities may take longer to complete their educational journeys, may be in school longer than ten years if they are completing advanced or additional programs, and/or may need to return to school due to the changing nature of their disability, the workplace, and the considerable challenges in securing appropriate work after graduation.

**Recommendation 173: Interconnection between financial aid and the Ontario Disability Support Program (non-regulatory)**

The Ontario government should:

1. undertake a review of how scholarships and graduate studentships (teaching assistant-ships, research assistant-ships, graduate assistant-ships) relate to both the student financial aid system and the Ontario Disability Support Program, as well as how student financial aid and the Ontario Student Assistance Program intersect, in order to identify barriers faced by students with disabilities in postsecondary education.
2. develop and implement a plan to address the barriers identified from the review in [recommendation 173](https://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022#rec173).

**Theme 2: Transparency**

**Recommendation 174: Transparency of eligibility rules**

Postsecondary institutions shall ensure that all financial aid policies, including those at the departmental and faculty level, clearly state the requirements or eligibility rules that have been created for students with disabilities.

**Timeline:** Within six months of the regulation being enacted.

**Recommendation 175: Access to financial aid information**

Colleges and universities shall ensure that all institutional financial aid information must be publicly available, easily located, readily accessible, presented in plain language and clear, to be readily available to and understood by students with disabilities.

**Timeline:** Within six months of the regulation being enacted.

**Recommendation 176: Central tool (non-regulatory)**

The Ontario government should create and maintain a central tool to inform students with disabilities and financial aid administrators about eligibility guidelines of disability- related funding programs (for example, Ontario Student Assistance Program, Assistive Devices Program), applicable restrictions, how the funding programs interact with one another, as well as a timetable or calendar with important deadlines, and set up a notification system for students and other stakeholders to use in signing up for updates, reminders, etc.

**Recommendation 177: Review of Assistive Devices Program (non-regulatory)**

The Ontario government should review the [Assistive Devices Program](https://www.ontario.ca/page/assistive-devices-program) and update funding allowances, taking into consideration inflation, changing technologies, additional fees (for example, administrative fees and service charges) and changes to individual needs for assistive devices due to the COVID-19 pandemic.

**Theme 3: Graduate student funding**

**Recommendation 178: Graduate student financial aid policy**

We agree with the recommendations from the National Graduate Experience Taskforce ([Understanding Accessibility for Graduate Students with Disabilities in Canada](https://www.neads.ca/en/about/projects/graduate-taskforce/pdf/Graduate-Report-Extended-Executive-Summary.pdf), 2016), and recommend that:

1. the Ontario government and postsecondary institutions shall create policy measures within provincial and institutional financial aid systems that recognize the different experiences and requirements of master’s and PhD student populations and provide funding options to meet their unique needs, with an emphasis on reducing the financial gap for graduate students with disabilities.
2. postsecondary institutions shall review their financial aid policies around disability related leaves of absence, and, if not already in place, create and implement exceptions regarding leaves of absence in cases of disability-related circumstances.
3. postsecondary institutions shall review institutional graduate funding packages to include disability-related considerations (for example, leaves, academic employment, funding for disability-related accommodations to travel to academic conferences), where applicable.
4. postsecondary institutions shall review their tuition policy and grant graduate students with disabilities eligibility for tuition reduction at the graduate level based on working capacity percentages (full course load equivalency), while being able to maintain full-time status and thus their eligibility to hold awards, bursaries and working opportunities.
5. postsecondary institutions shall regularly measure the effectiveness of these practices by assessing their impact on retention rates and the student experience.

**Timeline:** (a-b) within one year, (c-d) within two years and e) within three years of the regulation being enacted.

**Recommendation 179: Dedicated accommodation funding**

Postsecondary institutions shall create an institutional framework whereby students with disabilities can access dedicated internal funds to offset their accommodation and unique costs associated with their graduate programs.

**Timeline:** Within two years of the regulation being enacted.

**Recommendation 180: Graduate scholarships**

We agree with the recommendations from the National Graduate Experience Taskforce ([Understanding Accessibility for Graduate Students with Disabilities in Canada](https://www.neads.ca/en/about/projects/graduate-taskforce/pdf/Graduate-Report-Extended-Executive-Summary.pdf), 2016), and recommend that:

1. the Ontario government shall undertake reviews of the practices and policies of the Ontario Graduate Scholarships program, as well as all other government-funded graduate scholarships, to ensure accessibility and full inclusion of students with disabilities, including students who are enrolled part-time as a result of their disability.
2. as part of such a review, the Ontario government shall examine funding and application policies and practices to ensure accessibility for graduate students, including demographic collection methods, application accessibility, equity of information provision, availability of dedicated accommodation funding, and policies around research load, time to completion and leaves.
3. the Ontario government shall ensure that the application forms and processes for the Ontario Graduate Scholarship program and other government-funded graduate scholarships are accessible to students using screen reader and screen magnifier software.

**Recommendation 181: Federally funded graduate scholarships (non-regulatory)**

We agree with the recommendations from the National Graduate Experience Taskforce ([Understanding Accessibility for Graduate Students with Disabilities in Canada](https://www.neads.ca/en/about/projects/graduate-taskforce/pdf/Graduate-Report-Extended-Executive-Summary.pdf), 2016), and recommend that the Ontario government should:

1. encourage federal research granting bodies to undertake reviews of the practices and policies of the Ontario Graduate Scholarships program, as well as all other government-funded graduate scholarships, to ensure accessibility and full inclusion of students with disabilities, including students who are enrolled part time as a result of their disability.
2. as part of such a review, federal research granting bodies should examine funding and application policies and practices to ensure accessibility for graduate students, including demographic collection methods, application accessibility, equity of information provision, availability of dedicated accommodation funding, and policies around research load, time to completion and leaves.
3. encourage federal research granting bodies to ensure that the application forms and processes for graduate scholarships are accessible to students using screen reader and screen magnifier software.

**Recommendation 182: Graduate funding guidelines**

Postsecondary institutions shall:

1. review their graduate funding package guidelines and the intersection with accessibility policies (student facing and employee facing) to ensure that graduate students with disabilities are not disadvantaged, either by the impact of a teaching assistant-ship on disability support funding, or by being excluded from a teaching assistant-ship because of their disability.
2. implement policies to remove the barriers identified in part a) and ensure that graduate students with disabilities are not disadvantaged by the institution’s graduate funding package guidelines.
3. collaborate with appropriate stakeholder groups to regularly measure the effectiveness of practices developed in response to b) on student retention and quality of experience of students with disabilities in postsecondary education.

**Timeline:** a) within one year, b) two years, and c) three years of the regulation being enacted.

**Recommendation 183: Conferences**

Postsecondary institutions shall:

1. ensure that student financial aid assessments for students with disabilities consider additional disability-related costs incurred while travelling to and participating in academic conferences.
2. create a centralized “conference accessibility fund” for students to access when needing to travel to academic conferences, for use when advocacy with conference organizers has been exhausted without effect.

**Timeline:** Within 18 months of the regulation being enacted.

**Recommendation 184: Time to completion**

Where it has been determined that time for completion of a graduate degree for a student with a disability can be extended as an accommodation, postsecondary institutions shall ensure that graduate student financial aid and funding programs are extended to graduate students with disabilities who, for disability-related reasons, are beyond the expected timeline to completion of their program.

**Timeline:** Within two years of the regulation being enacted.

**Theme 4: Intersectionality**

**Recommendation 185: Intersectionality (non-regulatory)**

The Ontario government and postsecondary institutions shall collaborate to ensure that existing and new financial aid policies and practices are reviewed and developed in the context of intersectional identities of students with disabilities. These policies should be accessible, written in plain language, and made publicly available via institutional and provincial financial aid websites.

**Appendix A: Committee membership**

**Voting members:**

* Tina Doyle (Chair), University of Toronto Scarborough
* Tory Bowman, Spinal Cord Injury Ontario
* Sambhavi Chandrashekar, D2L Corporation
* Karen Csoli, Niagara College
* Olga Dosis, George Brown College
* Janice Fennell, Sheridan College
* Ashton Forrest, disability community representative
* Marie-Claude Gagnon, University of Ottawa
* Joseph Roy Gillis, University of Toronto
* Carolyn Hepburn, Sault College
* Jennifer Curry Jahnke, Mohawk College
* Julia Kowal, disability community representative
* Jim Kyte, Algonquin College
* Ainsley Latour, National Educational Association of Disabled Students (Mahadeo Sukhai, Alternate Member)
* Elizabeth Mohler, BALANCE for Blind Adults
* Meri Kim Oliver, Colleges Ontario
* Jeanette Parsons, Inter-University Disability Issues Association
* Anne Pottier, McMaster University
* Ben Poynton, University of Toronto
* Marc Wilchesky, York University

**Non-voting members:**

* Shirley Carder, Ministry of Colleges and Universities

**Appendix B: Glossary of terms and definitions**

Ableism

A belief system, analogous to racism, sexism or ageism, that sees persons with disabilities as being less worthy of respect and consideration, less able to contribute and participate, or of less inherent value than others. Ableism may be conscious or unconscious, and may be embedded in institutions, systems or the broader culture of a society. It can limit the opportunities of persons with disabilities and reduce their inclusion in the life of their communities (Ontario Human Rights Commission, 2018).

Ableist

An “ableist” belief system often underlies negative attitudes, stereotypes and stigma toward persons with disabilities and are often based on the view that disability is an “anomaly to normalcy,” rather than an inherent and expected variation in the human condition (Ontario Human Rights Commission, 2016)

Academic journey

The academic journey begins with a student’s first point of contact and continues throughout their experience with that institution.

Academic social life

Students participating with each other in socially based academic activities such as group projects, study groups, class and labs, research and social media specific to courses or programs.

Accessibility

The degree of ease that something (for example, device, service, physical environment and information) can be accessed, used and enjoyed by persons with disabilities. The term implies conscious planning, design and/or effort to make sure something is barrier-free to persons with disabilities. Accessibility also benefits the general population, by making things more usable and practical for everyone, including older people and families with small children (Ontario Human Rights Commission).

Accessibility lens

A tool for assessing how objects, policies, processes and programs impact on persons with disabilities. It is specifically used to identify potential and existing barriers, and corresponding solutions for removing these barriers.

Accessible

When a space or item can be used or experienced by the full range of human diversity with respect to ability, language, culture, gender, age and other forms of human difference in such a way that achieves independence and interdependence, dignity, integration, inclusion and equality of opportunity (Renalds et al. 2010).

Accessible digital content

When students with diverse disabilities can produce/maintain/consume/engage with the content independently and effectively.

Accessible digital learning

When curriculum, instruction, assessment and all related processes such as admission, disability support, etc., happen in ways that students with disabilities can participate independently and effectively.

Accessible event planning tool

A tool that considers all facets of institutionally sanctioned events for potential accessibility barriers, includes guidelines and resources for removing identified barriers, and addresses common barriers, such as providing for the admission and presence of accessibility support providers (for example, attendant services).

The [University of Toronto](https://www.utm.utoronto.ca/accessibility/access-campus/creating-inclusive-events-and-experiences) offers a good example of an accessible event planning tool.

Accessible and inclusive pedagogy/andragogy

Embracing diversity in order to meet the varying learning needs and styles of students. For students with disabilities, inclusive teaching practices aim at minimizing the consequences of functional limitations and removing barriers to learning by planning ahead for a variety of learning needs.

Accessible technology

Technology is accessible if it can be accessed by all students, including students who use assistive technology. Technology must conform to the technical accessibility standards as specified by applicable regulations and be functionally usable by students with diverse disabilities independently and effectively. Digital technology must be perceivable, operable, understandable, and robust (w3.org).

Ally/allyship

A member of the dominant group who acts against oppression (Ontario Human Rights Commission, 2013).

Andragogy

The art and science of helping adults learn, focused upon:

1. learning behaviours (degree of self-direction)
2. role of learners’ experiences
3. orientation to learning
4. readiness to learn
5. motivation for learning

Assessment tools

The technological format being used to facilitate the demonstration of skills or mastery of knowledge of a course or program.

Assistive technology

In the digital learning context, assistive technology is any piece of equipment or software program that is used to maintain or improve the functional capabilities of students with disabilities for digital engagement in learning and related activities.

Attitudinal barrier

Behaviours, perceptions and assumptions that discriminate against persons with disabilities. These barriers often emerge from a lack of understanding, which can lead people to ignore, to judge, or have misconceptions about a person with a disability.
Examples of attitudinal barriers include:

* assuming a person with a disability is inferior
* assuming that someone with a speech disorder cannot understand you
* forming ideas about a person because of stereotypes or a lack of knowledge
* making a person feel as though you are doing them a “special favour” by providing their accommodations (Council of Ontario Universities, 2017)

Bona fide academic requirements

Legitimate academic standard or outcome of a program or academic credential (paraphrased from Ontario Human Rights Commission – Policy on Accessible Education for Students with Disabilities, 2018). Established by the Meiorin Test.

Built environment

Includes the human-made space in which people live, work and recreate on a routine basis. This includes the indoor and outdoor facets of:

* sites/grounds
* buildings
* facilities
* paths of travel

As well as the layout and design of their contents, including but not limited to:

* lighting, acoustics, temperature and other environmental components
* furniture
* equipment
* built-in counters, storage and shelving
* accessories such as doorknobs and light switches
* greenery and plants

Taken together, this will facilitate human “interactions that inspire trust and reciprocity among” members of the community (Renalds et al. 2010, p. 68).

Campus life

The full postsecondary education experience, encompassing all academic and non-academic aspects.

Co-designed

Participatory design processes centred around groups of people, particularly ones with lived experience in a particular topic, who collectively contribute to the formulation of a solution to a problem. Co-design is a process which includes idea generation, designing solutions, approvals, implementation and evaluation.

Digital content

Learning material that is produced, maintained, consumed and engaged with online or offline using digital means, including material purchased from vendors, downloaded for cost or free, or shared by educators.

Digital learning

Learning that happens using digital technology and digital content. Learning includes creation and engagement with curriculum, instruction and assessment.

Digital learning environment

The online/blended/hybrid/remote space where learning takes place using digital technology and digital content. While online learning is developed for fully online delivery, remote learning happens when learning designed for classroom is delivered online in times of interruptions to face-to-face class. Blended and hybrid learning allow for both classroom and online learning to coexist.

Digital technology

Includes all software tools and other equipment used in learning such as:

* an integrated learning platform or learning management system with related tools acquired from one source – commercial, open-source, or developed in-house
* additional software tools related to learning purchased, downloaded for cost or free, or developed in-house
* any equipment students interact with in the learning process that is purchased, borrowed, acquired, or developed in-house

Diversity

The presence of a wide range of human qualities and characteristics. The dimensions of diversity may include (but are not limited to) ethnicity, race, colour, religion, age, gender and sexual orientation (Ontario Human Rights Commission, 2013).

Educators

Employees who are involved in program or course design, delivery and instruction, including staff, faculty, teaching assistants and guest presenters of postsecondary institutions.

Equity

Fairness, impartiality, even-handedness. A distinct process of recognizing differences within groups of individuals and using this understanding to achieve substantive equality in all aspects of a person’s life (Ontario Human Rights Commission, 2013).

Equity-deserving group

Those that identify barriers to equal access, opportunities and resources due to disadvantage and discrimination (Canada Council for the Arts, 2020).

The concept of ‘equity-seeking,’ “while well-intentioned, perpetuates a perception of these groups as interlopers. Those on the margins of our community, who feel or are made to feel that they do not belong, deserve equity as a right. They should not be given the burden of seeking it and they should not be made to feel that they get it as a privilege from the generosity of those who have the power to give it, and hence the power to take it back“ (Tettey, W., 2019).

The term represents a shift in language from ‘equity seeking’ to ‘equity-deserving.’

Essential academic requirements

Phrase used by the Ontario Human Rights Commission in *Accessible Education for Students With Disabilities* to indicate broader expectations of a course/program. The example provided in Section 8.7 suggests that this goes beyond bona fide academic requirements (example is a student is in a hospital and cannot submit an essay by the due date).

Experiential learning

An educational activity facilitated and supported by a college or university through which students learn while doing. Students participate in workplaces, or simulated workplaces, where they are exposed to authentic demands and expectations. The goal of experiential learning (EL) experience is to improve student’s employability and interpersonal skills and to support their transition to the workforce (Ministry of Advanced Education and Skills Development, 2017).

Extracurricular

Activities in which students are outside of the realm of academic education. Whether student or school led, participation is typically voluntary. Participation often helps foster student learning while benefitting well-being by increasing self-esteem, general health and social connections.

Facilities management staff

Employees involved in the management, design and construction of the built environment. This includes, but not limited to, architects, landscape designers, urban planners and interior designers.

Full inclusion

Full and authentic inclusion implies total membership in the postsecondary education community. This means that students with disabilities shall have access to and are encouraged to participate in the same curricular and co-curricular activities as their peers without disabilities.

Human rights

Human rights are the rights to which persons are inherently entitled to because they are human beings. Human rights describe how we instinctively expect to be treated as persons. They define what we are all entitled to – a life of equality, dignity and respect, to live free from discrimination and harassment.
(Government of Canada, 2020). Retrieved from *About human rights*.
These rights “usually have higher status than other legal entitlements; both have higher legal status than interests, values, beliefs” (OHRC, 2012). Retrieved from *Policy on Competing Rights: OHRC framework*.

Implicit bias

“a bias or prejudice that is present but not consciously held or recognized” (Merriam-Webster, 2021)

Inclusive design

Concepts which underlie and support a mindset and practice of “design that considers the full range of human diversity with respect to ability, language, culture, gender, age and other forms of human difference” (Inclusive Design Research Centre, 2020). In line with the Inclusive Design Research Centre, the principles of inclusive designs are:

* recognize diversity and uniqueness
* inclusive process and tools
* broader beneficial impact

Information

Includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning. (“information”) O. Reg. 191/11, s. 9 (1).

Information and communication barriers

Information or communications barriers occur when sensory disabilities, such as hearing, seeing, or learning disabilities, have not been considered. These barriers relate to both the sending and receiving of information.
Some examples:

* Electronic documents that are not properly formatted and cannot be read by a screen reader.
* Lectures that are confusing and poorly organized.
* Language that is not clear.
* Print that is too small or in a font that is difficult to read.
* Videos that are not captioned and don’t have transcriptions

Intersectionality

The complex, cumulative way in which the effects of multiple forms of discrimination (such as racism, sexism and classism) combine, overlap or intersect especially in the experiences of marginalized individuals or groups.

Internalized ableism

Personal acceptance, or endorsement of, negative attitudes and beliefs about disability towards self by persons with disabilities. This results in a negative self-concept including but not limited to feeling less than, self-doubt about capability, feeling they are a burden and that they do not belong.

“Internalization occurs through the accumulative, residual and reoccurring experiences of (ableism)…‘the point is oppressed people are routinely worn down by the insidious trauma involved in living day after day in a sexist, racist, classist, homophobic, and ableist society’”(Burstow 2003, 1296 as cited in Campbell, 2008, 155).

Information technology/communications staff

Employees whose responsibilities include communications of Information Technology-related announcements, delivering Information Technology training, supporting user adoption of postsecondary education provisioned Information Technology tools/systems, and providing web publication services to the postsecondary education community.

Media/creative arts staff

Employees whose primary responsibility is to build and create accessible media. This includes, but not limited to, graphic designers, video producers, marketing staff (digital and traditional), web developers and communications.

Microaggression

A statement, action or incident regarded as an instance of indirect, subtle or unintentional discrimination against members of a marginalized group.

Mobility trainers

Specialized individuals that train students who are blind to navigate the physical environment with the goal of independent navigation.

Multi-year accessibility plan and the annual status reports – O. Reg. 191/11, s. 4 (1)

The Ontario government, Legislative Assembly, designated public sector organizations and large organizations shall:

1. establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its requirements under this regulation
2. post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request
3. review and update the accessibility plan at least once every five years.

Postsecondary institutions

Every college of applied arts and technology established under the *Ontario Colleges of Applied Arts and Technology Act, 2002*.

Every university in Ontario, including its affiliated and federated colleges, that receives operating grants from the Ontario government.

It is governed by the *Education Act* or the *Private Career Colleges Act, 2005*.

It offers all or part of a postsecondary education program leading to a degree pursuant to a consent granted under the *Postsecondary Education Choice and Excellence Act, 2000*.

Practicum placement

A practicum placement (sometimes may be called “work placement”) is an undergraduate or graduate-level course, often in a specialized field of study, that is designed to give students supervised practical experience in their field of study.

Usability

The extent to which a product can be used by specified users to achieve specified goals with effectiveness, efficiency and satisfaction in a specified context of use.

Pedagogy

The art and science of helping children learn (also, the term used for the scholarship of teaching practice).

Privilege

Unearned power, benefits, advantages, access and/or opportunities that exist for members of the dominant group(s) in society. Can also refer to the relative privilege of one group compared to another (Ontario Human Rights Commission, 2013).

Protective Service

Those responsible for providing safety and security for persons, buildings, and assets of the postsecondary institution. As well as providing assistance in emergencies (for example, medical) and public education services on safety. This includes but is not limited to the campus safety office, community peace officer, campus safety members, including management, special constables, security guards.

Quality assurance process – colleges

The Ontario College Quality Assurance Service delivers credential validation and quality assurance processes for the public college system in Ontario to assure students, graduates, employers and the public of the quality of the system’s comprehensive programs and services. The Ontario College Quality Assurance Service and its College Quality Assurance Audit Process is recognized by the International Network of Quality Assurance Agencies in Higher Education as being an agency that meets the Guidelines of Good Practice and was developed to ensure quality and continuous improvement in Ontario’s colleges.

The College Quality Assurance Audit Process is an institutional level process that involves the regular and cyclical review of each college’s quality assurance mechanisms. The standards provide the framework for Ontario’s colleges in assessing the extent to which their quality assurance mechanisms meet the established standards. Its purpose is developmental, and its intent is to ensure continual improvement.

Quality assurance process – universities

The Ontario Universities Council on Quality Assurance oversees quality assurance processes for all levels of programs in Ontario’s publicly assisted universities and helps institutions to improve and enhance their programs. Under the Quality Assurance Framework, these institutions have undertaken to design and implement their own Institutional Quality Assurance Process that is consistent not just with their own mission statements and their university Degree Level Expectations, but also with the protocols of this framework. The Institutional Quality Assurance Processes are at the core of the quality assurance process. Furthermore, the universities have vested in the Quality Council the authority to make the final decision on whether, following the council-mandated appraisal of any proposed new undergraduate or graduate program, such programs may commence.

Restorative practice

Seeks to repair relationships that have been damaged between individuals and to strengthen connections and relationships between community members, improve communication, foster shared community values, and enhance understanding and empathy.

Service animals

The customer service standards under the Accessibility for *Ontarians with Disabilities Act, 2005* requires organizations covered by the standards to:

* allow a person with a disability to be accompanied by a guide dog or other service animal on those parts of the premises that the public and other third parties have access to, except where the animal is excluded by another law from the premises
* ensure that other measures are available to enable a person with a disability to access the provider’s goods, services or facilities where a service animal is excluded by another law
* train employees, volunteers and others about how to interact with people using guide dogs or other service animals
* an animal is considered a service animal if either of the below criteria are met:
	+ it wears a harness, vest or other visual indicator
	+ the person with a disability provides documentation from a regulated health professional

Under the customer service standards there are no restrictions on what type of animal can be used as a service animal. There are various types of service animals besides guide dogs that support people with various types of disabilities, such as: vision loss, hearing loss, Epilepsy, autism, physical disabilities and mental health disabilities. This includes service animals for emotional support.

Simulations

Instructional scenarios where the learner is placed in a "world" defined by the teacher. They represent a reality within which students interact. The teacher controls the parameters of this "world" and uses it to achieve the desired instructional results. Students experience the reality of the scenario and gather meaning from it.

Silo

“An isolated grouping, department, etc., that functions apart from others especially in a way seen as hindering communication and cooperation” (Meriam-Webster, 2022).

Social belonging

The experience of connection and relationship with others. Social belonging is a basic human need that is empirically linked to good health, immune function, intellectual performance, well-being and reduced mortality (Oertle and Bragg, 2014). Belonging is strongly linked to persistence for postsecondary education students with disabilities. When they feel like they belong, they feel connected to, included, and accepted by others and the educational institution (Goodenow, 1993). Belonging is measured by the student’s perception of their sense of membership within the institution, their involvement in various settings, and the support they experience (Tinto, 2012).

Social realms

A domain in which social experiences between individuals occur. This includes the context and the opportunity for individuals to experience social connections with each other.

Student

This term includes all individuals enrolled in (or who are considering applying to) a degree or certificate granting academic or professional program, continuing education students, and students in co-op, placements, field experiences, clinical placements, trades, etc.

The teaching assistant role of students is covered within the term ‘educator’ in the *Integrated Accessibility Standards Regulation* under information and communications standards.

Student leaders

All employees of student unions, and students elected by the student body, to represent them on matters of school programming, policy and campus issues.

Students with Disabilities

All undergraduate and graduate students enrolled in degree or certificate granting academic or professional programs and all continuing education students with diagnosed disabilities.

Systemic barriers

Organizational or systemic barriers are policies, procedures, or practices that unfairly discriminate against individuals and can prevent them from participating fully in a situation. Organizational or systemic barriers are often put into place unintentionally. Examples of organizational or systemic barriers include: a program that requires students to take a full course load, office hours conducted in person only, or not allowing students to access their professors or administrators by phone, e-mail, or other means of communication. It can also include having poorly defined or unclear learning objectives for a course or requiring students to express their understanding of course content in only one way.

Transformational leadership

A leadership approach that causes change in individuals and social systems. (Hussein Jaafari, 2019)

Trauma-Informed Practice

A strengths-based framework that considers the pervasive nature of trauma including, but not limited to, the negative impact of “ableism” and potential intersectional stressors of other systemic biases on individuals. With respect to students with disabilities, it strives to understand the lived experience of students and to promote an environment of physical, psychological, and emotional safety, healing, and recovery rather than practices that may inadvertently re-traumatize students.

Work integrated learning

Work integrated learning is a model and process of curricular experiential education which formally and intentionally integrates a student’s academic studies within a workplace or practice setting.

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