



Special Education Advisory Committee

November 18, 2021 6:00 PM

MS Teams Virtual Meeting

AGENDA

Land Acknowledgement

The Grand Erie District School Board recognizes the Haudenosaunee and Anishinaabe people, as the traditional peoples of this territory. We acknowledge and give gratitude to the Indigenous peoples for sharing these lands in order for us to continue our work here today.

AGENDA

Item	Info.	Dia.	Res.	Responsibility
LEAD				
A-1 Opening				
(a) Welcome/ Land Acknowledgement Statement			√	W. Rose
(b) Roll Call			√	P. Curran
(c) Agenda Additions/ Deletions/ Approvals		√	√	W. Rose
LEARN				
B-1 Timed Items				
(a) Destreamed Math and the Inclusion of Students with Special Education Needs – The Program K-12 team will discuss what the Grade 9 Destreamed Math curriculum looks like and how it supports the inclusion of students with special education needs.	√	√		A. Smith/A. Myhal
(b) A Day in the Life of the Communicative Disorders Assistant	√	√		K. Mertins/B. Afman

Learn Lead Inspire



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Item	Info.	Dia.	Res.	Responsibility
LEAD				
C-1 Business Arising from Minutes and/or Previous Meetings				
(a) Ratification of Minutes October 21, 2021*			√	W. Rose
(b) D. Lepofsky – A Practical Guide to the Duty to Accommodate* – Video Link https://www.youtube.com/watch?v=y32XvjWmDAQ	√	√		P. Boutis
(c) Standard 1 – The Board’s Consultation Process* and Appendix A*	√	√		F. Lainson
(d) Input on the Term “Special Education”* - given the consultation feedback, maintain status quo? Support a change in language?	√	√	√	L. Sheppard/Team
(e) Lexia data collection - update	√	√		F. Lainson
(f) AODA Education Standard Recommendations i. LDAO Response to K-12 Recommendations* ii. LDAO Response to Transition Recommendations* iii. LDAO Response to the Post secondary Recommendations* iv. Association Response to K-12 Recommendations* v. Association Response to Transition Recommendations*				L. Thompson
LEARN				
D-1 New Business				
(a) A Bold New Vision – Grand Erie’s Multi-Year Strategic Plan 2012- 26 and Annual Learning and Operating Plan 2021-22	√	√		L. Thompson/P. Bagchee



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(b) T.H.R.I.V.E – Virtual Mode program to provide enriched learning opportunities for students	√	√		J. White/J. Hughes
(c) PPM81 – Memo* https://www.ontario.ca/document/education-ontario-policy-and-program-direction/policyprogram-memorandum-81	√			K. Mertins
(d) Remote Learning Guide for Students with Special Education Needs – i. Educator Tip Sheet* and ii. Parent Tip Sheet*	√	√		L. Thompson
LEAD				
E-1 Other Business				
(a) Transitions to School – review of current process and input session	√	√	√	F. Lainson/L. Sheppard
(b) OnSIS data for Students with Special Education Needs – December agenda item – what is the focus for discussion?	√	√	√	L. Thompson
INSPIRE				
F-1 Standing Items				
(a) Policy/Procedures Out for Comment <ul style="list-style-type: none"> F4 Trustee Honoraria HRI18 Occasional Teacher Evaluation Comments are due by November 24, 2021 and are sent to: policiesandprocedures@granderie.ca	√			W. Rose
(b) Trustee Updates	√			R. Colliver/T. Waldschmidt

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LEARN LEAD INSPIRE				
G-1 Information Items				
(a) Regional Special Education Council (RSEC) updates				K. Mertins/J. White/L. Thompson
LEARN LEAD INSPIRE				
H-1 Community Updates				
(a) None				
LEARN LEAD INSPIRE				
I-1 Correspondence				
(a) Ltr – Trillium Lakelands DSB – Support for Bill 172 FASD Oct 05/21*	√			
Item	Info.	Dia.	Res.	Responsibility
INSPIRE				
J-1 Future Agenda Items and SEAC Committee Planning				
(a) OnSIS Data for Students with Special Education Needs	√			W. Rose
(b) Suspension, Expulsion and Exclusion – Students with Special Education needs 2020-21				W. Rose
K-1 Next Meeting				
Thursday, December 9, 2021 MS Teams	√			W. Rose

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L-1 Adjournment				
Meeting adjourned at	p.m.		√	W. Rose

Note: Column Abbreviations

* Attachments to the agenda

Info.Item for information only

Dia. Item for dialogue

Res. Item for resolution or recommendation

SEMT Special Education Management Team

AGENDA ITEM(S)

Standing:

- LDAO SEAC Circular September, November, February, April and June (as available).



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MINUTES

Present: Chair W. Rose, W. Baker, L. Boswell, P. Boutis, C. Brady, T. Buchanan, B. Bruce, R. Collver, L. DeJong, A. Detmar, M. Dumoulin, J. Gemmill, K. Jones, F. Lainson, K. Mertins, L. Nydam, W. Rose, L. Scott, L. Sheppard, L. Thompson, J. Trovato T. Waldschmidt, J. White, T. Wilson.

Regrets: P. Bagchee, A. Csoff, M. Gatopoulos.

Recorder: P. Curran.

A - 1 Opening

(a) Welcome

Chair Rose called the meeting to order and welcomed everyone. She informed members the meeting would be recorded.

The Land Acknowledgement Statement was read by Chair Rose.

(b) Agenda Additions/Deletions/Approval

Add C-1 Business Arising (d) Nursing Shortage SEAC Input – W. Rose
Amend D-1 New Business (a) to indicate P. Boutis item – P. Boutis
Add G-1 Information Items (b) Nursing Services Update – J. White
Add G-1 Information Items (c) Accessible Features for EQAO / OSSLT – J. White

Moved by: A. Detmar

Seconded by: C. Brady

THAT the SEAC 21-02 Agenda for Thursday, October 21, 2021 be approved as amended.
CARRIED

B - 1 Timed Items

(a) Balanced School Year Pilot Project

Superintendent Baker explained a committee has been exploring the implementation of a non-traditional calendar which would start in August after a five-week summer break with the extra 20 days spread throughout the year. It is not perfectly balanced but other than the starting date, matches the usual school year calendar as far as Professional Activity dates, statutory holidays, exam and reporting dates. Across Ontario, 29 other school boards as well as many in other parts of Canada and North America are using this model. The research indicates learning loss occurs after a two-month summer break and the time it takes students to catch up affects their educational outcome. The traditional calendar has been in place for 150 years and accommodates parents and teachers who often plan summer vacations based on this schedule.

The subcommittee has been working on the pilot features for a year now and will submit a report to the Board in November. The pilot is intended for the 2022-23 school



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year in one Grand Erie elementary school. Further comments are welcome by email to wayne.baker@granderie.ca.

J. White asked if the study included any information on mental health and wellness. Superintendent Baker indicated there is surrogate information on the benefits of shorter, more frequent breaks that reduce student and staff stress and improve behaviour.

C. Brady informed members, her daughter has taught G1 and children with special needs, from a balanced year calendar for 17 years in Australia and notes how both students and staff return from these breaks refreshed while retaining their learning and their routines.

(b) **A Day in the Life of the Speech Language Pathologist (SLP)**

K. Mertins explained the SLP work at all tiers and that speech pathology requires a good understanding of speech and language to assist in implementing strategies for good language development.

Most of their time is spent in tier 3 individualised support for students.

M. Dumolin works the area from the middle of our board from Lake Erie up through the centre of our district. She has an interesting portfolio as part of her time is school based speech language pathology.

A Day in the Life of a Speech Language Pathologist

A. Supporting Students in Classroom

1. How Many Students do you Support in a Week?

The number of students an SLP see in a week varies significantly depending on the work that needs to be completed (e.g., assessments vs. resource team meetings or report writing).

2. How Many Students do you Support in a Year?

A full-time school SLP accepts approximately 120-140 referrals each school year. Augmentative and Alternative Communication (AAC) SLPs see fewer students because the service is more time intensive.

3. How do Schools Access Your Support?

Students who are discharged from Lansdowne Preschool Speech and Language Services in Year 2 of Kindergarten are transitioned to school-based speech and language services.



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Referrals for individualized, student-specific support are made through discussion at a school resource team meeting

Information provided by teachers, school staff and parents/guardians helps to determine if a referral is appropriate and what type of assessment might be needed (e.g., history of SLP involvement, areas of concern, severity of communication difficulties, etc.)

Parents must provide informed consent for the involvement of Communication Services.

SLPs are available to consult generally with school staff at any time.

B. With Students:

Work 1:1 with students to complete speech and language assessments
Observe students in the classroom setting in order to evaluate needs and abilities
Supervise intervention sessions being conducted by Communicative Disorders Assistants (CDA)

C. In Schools:

Attend resource team meetings, IPRC meetings and/or case conferences
Review student OSRs
Consult and collaborate with teachers
Meet with parents/guardians
Work within classrooms to support whole-class language and literacy programming.

D. In The Office:

Contact parents/guardians to obtain consent, gather background information, share assessment results, provide recommendations, discuss progress and next steps
Write assessment and progress reports
Set goals for CDA intervention
Make referrals to outside agencies
Develop and compile resources for home or classroom use (e.g., visual supports, communication books, home programming materials, etc.)
Respond to emails, manage caseload, schedule visits
Collaborate with other professionals

E. How Does Your Role Support Students in the Classroom?

Prevention – interventions can prevent literacy and behaviour problems
Collaboration – contribute to goal setting, planning and curriculum accessibility
Modelling – Team Teaching and model intervention activities
Adaptations – recommend task adaptations to augment student success
Screening & Assessment – Group-administered or one-on-one
Identification – Identify speech, language and communications challenges



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Intervention – individual treatment, small and large group as well as educators.

Questions:

P. Boutis asked how the team works with a student's Individual Education Plan (IEP).

K. Mertins explained the SLP will meet with teachers who are seeking to help students develop goals.

C - 1 Business Arising from Minutes and/or Previous Meetings

(a) Ratification of Minutes September 16, 2021

Page 5, 3rd paragraph text has purple underlined font.

Moved by: L. DeJong

Seconded by: J. Trovato

THAT the SEAC 21-01 Minutes for Thursday September 16, 2021 be approved as amended.

CARRIED

(b) Special Education and Well-Being Summer Programs Funding 2021-2022

R Collver commented on September 16, 2021 C-1 (b) and noted Chair Rose considered sending a letter of support requesting funding for next year's programs.

Chair Rose asked for data to support the letter she will draft.

L. Sheppard noted the summer funding has now been rolled into the GSN (Grants for Student Needs) but believes a letter of support will still be beneficial. Staff are compiling data for a Board / Ministry report and will be happy to share that for inclusion in the letter.

(c) Ltr – K-12 Education Standards and AODA Oct 2021

Members reviewed the letter developed by the subcommittee members who included P. Boutis, R. Collver, W. Rose and K. Jones.

L. Boswell asked about #6 (b) the possible inclusion of peer / friend input to a student's IEP. She is aware many students do not want their IEP to be known to others.

P. Boutis shared the recommendation came from a course she is studying, noting that sometimes the IEP gets hidden away and is never seen again. It begs the questions, "why are we hiding this?" And "why are we hiding disabilities". The goal is also to make peer to peer relationships more fulsome and inclusive.



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L. Boswell suggested 'voluntary' or 'opportunity' be added to indicate it is not required, but is a choice by the student or family.

P. Boutis will revise the letter before it is submitted.

Moved by: L. Boswell

Seconded by: L. DeJong

THAT the letter outlining Grand Erie DSB SEAC comments in respect to the Education Standards Development Committee's recent work be sent to them with a copy to Accessibility in Ontario.

CARRIED

(d) **Nursing Shortage – Input Discuss from SEAC**

Superintendent Thompson read the communication from the Ministry asking about numbers for students impacted by the shortage. As the matter is on their mind a letter is very timely.

K. Jones was happy with the letter but unsure how the situation can be remedied.

R. Collver participated in a weekly Minister's teleconference where she learned this situation is on his mind and is grateful they followed up with Grand Erie asking for numbers.

J. White mentioned her addition to the agenda may be more opportune at this time. She informed members they received communication from Home and Community Care Support Services to let us know the Ministry of Health amended the self-directed care program for family managed home care and it provides temporary options for students who require nursing services to attend school by providing funding to clients to purchase nursing services. Schools must accept the services and the funding is only available to approved students during the 2021-2022 school year. The board will have to develop partnership agreements to permit this work to happen.

Moved by: P. Boutis

Seconded by: L. Boswell

THAT the letter requesting Ministries review the nursing shortage and take steps to rectify the situation, be sent as drafted.

CARRIED

(e) **GEPI Representative from SEAC**

T. Waldschmidt offered to let his name stand. Superintendent Thompson will inform the Director's office.



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D - 1 New Business

(a) Annual Update – Grand Erie’s Multi-Year Accessibility Plan 2017-2022 Input Session

Ms. Mertins outlined the current year’s completed updates in section 9.

She shared the Accessibility Committee works collaboratively with the Safe and Inclusive Schools Committee and members review board policies and procedures through an accessibility lens. They also take information from staff and student census reports.

Grand Erie staff were provided with an incredible professional development day this past year and we are happy to announce the development of an accessible Grand Erie application and a Parent Portal.

Information Technology staff, Educational Technology staff, Student Success staff, Special Education staff and Elementary Program staff worked hard throughout this year to increase teacher awareness and implementation of accessible features.

A holistic approach is employed whenever possible, e.g., when the track at a secondary school was upgraded, the approach path was made accessible as well.

Visual cues will be added to stairs, railings, parking lots and any other places where it is required.

Plan to continue with the Rick Hansen Foundation partnership and looking to provide another Ambassador Showcase as they did last year.

Currently rolling out “How Can We Help You?” signs to schools.

Public buildings are required to meet the accessibility deadline of 2025.

Asked SEAC for input on any areas that could be included

P. Boutis asked if the committee is focusing on high level barriers to curriculum, such as adaptive materials, digital documents.

K Mertins advised the board’s web designer will be meeting with the committee to discuss print and how we can bring more uniformity to get maximum accessibility. R. Collver thanked the Accessibility Committee for their work and expressed her desire that the government makes accessibility a true focus.



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(b) **Grand Erie's Student Achievement and Well-Being Plan 2020-2021 – Outcomes for Students with Special Education Needs**

We continue to support educator understanding of effective differentiated instruction and assessment for students with special education needs.

Students are helped to develop their understanding of effective strategies that support their social- emotional well-being and learn how to use them.

Support is directly provided to students whenever possible.
An enhanced focus on supporting educators to meet the strengths and learning and well-being needs of their students.

Lexia Core5 was offered to 3,203 students and 38% advanced at least one grade equivalent level. There was a 33% increase in the number of students who improved skills and achieved success at grade level by the end of the school year.

Lexia Power Up was used by 599 students in grades 6-12 who completed 78,342 units resulting in 17% of participants moving above the foundational skills level.

TeachTown was provided to students in Intensive Support self-contained classes to independently practice and master life skills related to their individual needs. There were 3,498 passed or mastered lessons in this medium.

The provision of LRT (Learning Resource Teacher) support needed to be re-envisioned in order to best support students learning remotely. Involved a triangulation of communication between the principal, LRT and classroom and/or guidance staff to build a shared understanding of student strengths and needs.

Enhanced Autism Training Program was run through the Geneva centre to assist teachers who have students on the Autism Spectrum. The training increased staff confidence and impacted student success positively.



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Strategies to support Students with Complex Needs require collaboration between family, school, and community to ensure the child's needs are met. A virtual environment provides more challenges and requires staff develop new strategies.

Student Mental Health and Well Being was ongoing with social and emotional lessons delivered in person and virtually for which Social Workers received training.

Staff worked with Dr. Stephen Lewis to develop the Grand Erie Non-Suicidal Self-Injurious Protocol (NSSI). Professional learning in this area was provided to support staff. The training will be rolled out to administrators as well.

Comments on the value of the summer supports and its positive impact on students were shared.

Priorities for 2021-22

Education for Learners with Special needs

An asset-based focus will support accessible learning for all students
Schools will build the conditions for full participation of Universal design
Schools will provide opportunities using a tiered approach to strategies and supports.

Mental Health and Well-Being

Students have knowledge and skills to tend to their own well-being.
School personnel have the knowledge and skills to support students' well-being using preferred resources.
Staff have the knowledge and skills to tend to their own well-being.

T. Waldschmidt asked about the Lexia advancement. Would like to know the breakdown and if the 33% was included in the 38%.
Superintendent Thompson will get the data for next meeting.

R. Collver asked if the principal hires the Learning Resource Teacher (LRT) and how long they stay in that role. Is there a system guideline for what they should be looking for in the staff member?



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J. White stated administrators are provided with some guidelines for the LRT, but cautioned flexibility is required as each school has different needs. They monitor the duration of the LRT in a specific role. Have noticed over the last couple of years they had to train eight (8) new elementary LRT. L. Sheppard noted the secondary LRT movement is slight and usually occurs from LRT changing location but remaining in the same role. Superintendent mentioned often LRT move into an administrator's role.

R. Collver would like to see some continuity and encourage staff to remain in the role.

T. Waldschmidt asked how a student would fall under the NSSI protocol.

Superintendent Thompson indicated that the protocol is to help school staff know how to help students who intentionally injure themselves through, cutting, hitting or other means. There are a variety of reasons why students engage in this behaviour and students may come to school with wounds, scars, etc. This protocol will describe how to help the student and the family.

E - 1 Other Business

(a) D. Lepofsky – A Practical Guide to the Duty to Accommodate

P. Boutis asked members to review the video which will be discussed at the next meeting with an opportunity for questions.

W. Rose watched the video which runs about one and a quarter hours but very worthwhile to get an overview of accommodation in a broad sense. The accompanying document contains links to each of the major headings or topics addressed in the video.

F - 1 Standing Items

(a) Policy/Procedures Out for Comment

Members were advised of all policies and procedures currently under review and given instructions for commenting if they so wished.



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(b) **Trustee Updates**

T. Waldschmidt

- i) Thanked everyone for attending tonight.
- ii) Thanked everyone for their work over the summer.
- iii) Thanked the committee who did the research and the daunting work on the letter.

R. Collver

- i) Thanked members for allowing her and Trustee Waldschmidt to bring updates from the board. Sent hope these are helpful and welcomes any feedback.
- ii) September 30th was Orange Shirt Day and National Day of Truth and Reconciliation. The Indigenous Education Team provided a number of supports to every school aligned with the curriculum to learn about the legacy of residential school system. There was outstanding participation in classrooms across Grand Erie.
- iii) The Board received annual operating and learning plans from the senior team which guide the work of the system and address the goals of Grand Erie. The plans are available on our website.
- iv) K. Mertins mentioned the October Professional Development that focused on MENSA data and organizational behaviour.
- v) Congratulations to Facility Services for planting 100 trees and placing 100 stones to create peaceful places for sitting and /or reading.

G - 1 **Information Items**

a) **Relic of the Past: Identification Placement Review Committees (IPRC)**

P. Boutis indicated this was interesting to read the institutional history of how the current IPRC was developed over the years.

Superintendent Thompson found it interesting and noted one of the original purposes was to assess the scope of the special services to ensure funding was available. Ministry of Education funding has changed so much that an IPRC is no longer required to secure services for a student. She encouraged members to read it as it is an interesting read.

K. Mertins noted this is a timely item in terms of board and system professional learning and barriers. She will share it with her psychological services and speech/language pathologists as it is a great concrete example of how thinking can change process.

b) **Accessible Features EQAO for OSSLT Update**

We brought concerns about the lock down browser for students who were going to participate in the EQAO



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Last year EQAO hired a company to create a lock down browser in which the assessment could be taken electronically but would block access to any research. Grand Erie was not included in the pilot.

As a result many of the accessibility features our students were familiar with were missing, although others were available. This seemed to be a disadvantage to many students. There is now an updated lock down browser but does allow access to Word Q which many of our students use, but the browser's main feature is still read and write. Grand Erie's Information Technology Services department is creating a work around for four students. The first window for assessment has just opened and there will be another in the spring so we will be looking for the feedback on how this works for our students.

H - 1 Community Updates

a) Inclusion Action in Ontario

P. Boutis explained all information is included in her draft letter.

b) Ontario Disability Employment Network (ODEN)

i. Gold Standard

ii. ODEN Raising Expectations

F. Lainson recently attended the ODEN Expectations workshop provided for parents and students up to age 12. It provides a different perspective, encourages students to keep their options open and to continue the development of soft skills. Another session will be available on November 23rd. Also on November 9th there was one for students in Grade 6 and above for daytime and evening sessions. She encouraged everyone to attend if possible.

T. Buchanan shared October is National Disability Employment Awareness Month held by ODEN and Community Living. The Grand River dam in Paris is currently lit up in bright blue to show support. They were unable to get Brantford on board the past two years but hoping for next year.

I - 1 Correspondence

a) M. Jacques – Offering Presentation on Literacy

J. White mentioned he previously spoke at a Regional Special Education Council (RSEC) meeting.

Members would like to have him speak at a future SEAC meeting.

Chair Rose will look into the details and determine if there is a cost involved and report at the November meeting.



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J - 1 **Future Agenda Items and SEAC Committee Planning**

None

K - 1 **Next Meeting**

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At this time, we will continue to meet virtually as the Board Room will not be able to accommodate everyone with distancing and the Board requires attendees to follow COVID protocols.

L - 1 **Adjournment**

Moved by: P. Boutis

Seconded by: A. Detmar

THAT the SEAC 02-20 meeting held October 21, 2021 be adjourned at 8:11 PM.

Carried

Accessibility for Ontarians with Disabilities Act Alliance Update

United for a Barrier-Free Society for All People with Disabilities

Web: www.aodaalliance.org

Email: aodafeedback@gmail.com

Twitter: @aodaalliance

Facebook: www.facebook.com/aodaalliance/

A New Captioned Video Gives You a Practical Guide to the Duty to Accommodate People with Disabilities

October 6, 2021

Have you heard something about the duty to accommodate people with disabilities, but wanted to know what it actually means? Who owes this duty? To which people with disabilities? What does the duty include? What kinds of accommodations does it require? When does the duty to accommodate arise? Have you heard before that it is a duty to accommodate up to the point of "undue hardship," but wondered what "undue hardship" means?

Here's a brand new [captioned video](#) that answers all these questions. It is called "The Duty to Accommodate People with Disabilities 101 – An Introduction to the Duty to Accommodate." It is presented by AODA Alliance Chair David Lepofsky, who is also a visiting professor at the Osgoode Hall Law School.

This presentation talks about the duty to accommodate in a wide range of situations. It includes the duty of employers to accommodate employees and job applicants with disabilities. It also addresses the duty of those in the public and private sectors who provide goods, services or facilities to the public to accommodate people with disabilities. That includes a diverse range of organizations, like stores, restaurants, hotels, schools, colleges, universities, hospitals and other health care providers, public and private transportation providers, and so on.

This video is intended to help you whether you are a person with a disability, or a family member or friend of a person with a disability, or a public or private sector provider of goods, services or facilities.

Anyone involved in human resources work, or in direct customer service, or the management of an organization in the public or private sector can also benefit from this video. You don't need any background in the law to benefit from this video.

It can be helpful to you if you are a member of a municipality's Accessibility Advisory Committee, or of a school board's Special Education Advisory Committee, or of a Standards Development Committee appointed under the Accessibility for Ontarians with Disabilities Act.

We encourage you to watch this video and to share it with others, including via social media. Post a link to it on your organization's website. If you teach a course in college, university or other educational setting, feel free to use all or part of it as part of your instructional materials. Use this video as a tool to help in the campaign to make Ontario fully accessible to all people with disabilities.

The video runs about one and a quarter hours. To make it easier to use, and for those who don't have time to watch it all, we provide links below to each of the major headings or topics addressed in the video.

Let us know what you think of this video. Send your feedback to aodafeedback@gmail.com

An Introduction to the Duty to Accommodate People with Disabilities"

The video is available at <https://www.youtube.com/watch?v=y32XvjWmDAQ>

Here are links to key topics in the video:

1. Introduction and Overview 00:00 <https://www.youtube.com/watch?v=MeKQHuxP9XU>
2. Where does the Duty to Accommodate Come From? 2:27 <https://youtu.be/y32XvjWmDAQ?t=147>
3. Who Must Accommodate People with Disabilities? Who Has the Duty to Accommodate?
5:12 <https://youtu.be/y32XvjWmDAQ?t=312>
4. What is the Purpose of the Duty to Accommodate? 8:25 <https://youtu.be/y32XvjWmDAQ?t=504>
5. What are the Benefits of Fulfilling the Duty to Accommodate? 11:15 <https://youtu.be/y32XvjWmDAQ?t=675>
6. What Disabilities are Included within the Duty to Accommodate? 15:40 <https://youtu.be/y32XvjWmDAQ?t=941>
7. Examples of Accommodations that Can be Required 17:26
<https://youtu.be/y32XvjWmDAQ?t=1046>
8. What is the Content of the Duty to Accommodate? What Must an Organization Do?
26:05 <https://youtu.be/y32XvjWmDAQ?t=1565>
9. Some Red Herrings We Can Eliminate from Discussion About the Duty to Accommodate
34:05 <https://youtu.be/y32XvjWmDAQ?t=2045>
10. When Does the Duty to Accommodate Arise? 35:25 <https://youtu.be/y32XvjWmDAQ?t=2125>
11. When, If Ever, Can You Ask a Person, Requesting Accommodation, for Medical Documentation of Their Disability? 37:50 <https://youtu.be/y32XvjWmDAQ?t=2270>
- 12 The Undue Hardship Defence – General Principles 39:33 <https://youtu.be/y32XvjWmDAQ?t=2373>
13. When Can the Cost of Accommodation Justify a Failure to Accommodate?
49:14 <https://youtu.be/y32XvjWmDAQ?t=2954>
14. When Can Health and Safety Considerations Justify a Refusal to Accommodate?
57:42 <https://youtu.be/y32XvjWmDAQ?t=3461>
15. Can the Failure to Accommodate Be Defended on the Basis that It Adversely Affects the Morale of Other Workers? 59:10 <https://youtu.be/y32XvjWmDAQ?t=3546>
16. How Does the Duty to Accommodate Apply to Trade Unions and Collective Agreements?
1:00:49 <https://youtu.be/y32XvjWmDAQ?t=3649>
17. What Happens if Fulfillment of the Duty to Accommodate May Conflict with Other Rights of Other People?
1:03:48 <https://youtu.be/y32XvjWmDAQ?t=3829>
18. A Short, Punchy List of Defences or Arguments that Cannot Justify a Failure to Accommodate
1:06:56 <https://youtu.be/y32XvjWmDAQ?t=4016>
19. Concluding Thoughts 1:11:18 <https://youtu.be/y32XvjWmDAQ?t=4282>

Standard 1: THE BOARD'S CONSULTATION PROCESS

The purpose of this standard is to provide details of the Board's consultation process to the Ministry and to the public.

The Grand Erie District School Board values collaboration with families and community members.

Consultation with the Special Education Advisory Committee

To meet Regulation 464/97, the Grand Erie District School Board has ensured that its Special Education Advisory Committee has participated in the Board's Annual Review, under Regulation 306 of the Revised Regulations of Ontario (1990), of its Special Education Plan. Involvement has included:

- ongoing discussion at SEAC meetings throughout the 2020-21 school year;
- opportunity for input through an online survey link on Grand Erie's website;
- invitation to attend Board's budget meeting dealing with special education budgets;
- opportunity to meet with the Board's Manager of Business Services, to ask questions and receive clarification regarding Special Education budgets;
- first draft of the Plan was received by SEAC on April 22, 2021; the final draft was received on May 20, 2021.

Descriptions of any majority or minority reports received from members of SEAC concerning the Board's approved plan are as follows:

- None Received

On May 20, 2021 the Special Education Advisory Committee passed the following motion: "THAT the Special Education Advisory Committee recommend the Grand Erie District School Board approve the 2020-21 Special Education Plan, dated July 31, 2021.

The motion was carried.

Public Consultation

Overview information about the Special Education Plan and a link to the Special Education Plan were promoted on the Grand Erie website throughout the school year. A survey inviting public consultation about the plan was available through the summer of 2020 and from March until summer 2021. A link to the survey pops up whenever someone opens the Special Education Plan – it invites readers to fill out the survey after reading the Plan.

As a result of the Board's consultation with the community, Survey questions and responses are summarized below:

School (optional):

- Major Ballachey
- Bloomsburg
- Anonymous
- James L Mitchener
- Thompson Creek
- Russell Reid
- Paris District High School

Special Education Plan July 2021

- Russell Reid
- Walter Gretzky

2.What are the strengths of the special education plan?

- It is good for students with special education and behavioural needs; not so good for kids who fall in the grey zone
- Communication
- IEP consultation and review
- Learning is geared to individual student needs
- The ME program at Paris District High School is good but should be offered all day; students with disabilities shouldn't be forced into mainstream classes
- Education is geared to the student
- Comfortable learning from home (referring to virtual learning)

3.What is still needed in the special education plan?

- Needs more focus on special needs students who do not have Autism
- Issues around student with Autism having to wear a mask
-
- Music therapy needs to be included in the Plan
- Need to welcome parental input to revise the IEP at any time rather than set dates; important changes must be made in a timely fashion
- More in class help is needed
- More full-time special education classes
- Virtual learning needs to be more interactive

4.Does this plan help? Why or why not?

-
-

5.How might we best deliver services while being mindful of budget limitations?

- I don't know. I don't know your budget.
- Don't make students with Autism wear masks
- Keeping kids safe is key
- IEPs must be monitored to ensure implementation is occurring
- School boards were given additional money. Spend it on additional in-class help for students.
- Provide information about schools that have better full-time programming for students with developmental disabilities
- Budget cutbacks hurt the success of our students

Submit

Implementation of a renewed model of special education supports and services continued in the 2020-21 school year. In the renewed model:

- There was a focus on fulsome implementation of Tier 1, in-classroom or close-to-the classroom strategies and supports
- Learning Resource Teachers took on a lead role of supporting the knowledge and instructional capacity of all educators in the school in the area of Special Education
- The classroom teachers designed and implemented the student's program with the support of the Learning Resource Teacher, in the classroom
- In School Team processes were continued in all schools

- Dedicated multi-disciplinary teams were provided schools to attend resource team meetings
- Continued focus on the role of the Educational Assistant- goals for independence for students, how the EA is adding value to teacher programming

Further training for Learning Resource Teachers on the renewed model was significantly impacted by COVID-19 and virtual learning.

Grand Erie's Achievement Plan – Success for Every Student

The focus in the area of special services is how system staff support school staff to promote student learning and achievement.

1. How the special education system team guides and supports schools to learn about and implement effective differentiated instruction and assessment;
2. How wrap around supports to address a variety of student need that go beyond solely academic need are provided to students in order to decrease barriers to well-being and achievement.

Internal and External Reviews of Existing Special Education Programs and Services

There were no formal internal and external reviews of existing special education programs and services.

However, as a result of consultations with and input from Grand Erie's SEAC, school administrators and senior administration, the following changes to special education programs and service delivery will occur in the 2021-22 school year:

Mental Health Strategy

- Held a meeting during the school year with the Grand Erie Mental Health Advisory Committee.
- Attended Child & Youth Planning meetings with community agencies.
- With the move to distance learning, met regularly with the Directors of REACH and Woodview Child & Youth Mental Health Services to ensure regular and up-to-date communication.
- Continued to provide students with opportunities for sequenced and grade-appropriate social-emotional learning, while also building the capacity of educators to support students in this area.
- CYWs integral part of In-School Teams, where they provided advice, education and resources on social-emotional learning, self-regulation, healthy relationships and mental health awareness.
- The Suicide Risk Protocol was reviewed at Resource Team Meetings, and SafeTALK training was delivered to elementary Learning Resource Teachers.
- Through staff meeting and consultations, Social Workers (SW) consistently used the Grand Erie Safety Plan, assessment and tracking form.
- Where appropriate, SWs completed referrals to Mental Health & Addiction Nurses.
- CYWs and SWs supported traumatic events and completed Violent Threat Risk Assessments
- SWs began Wellness Checks in the spring of 2020.
- Wellness Checks by Social Workers were continued during the months of July and August and were made available to students attending summer camp and Camp Sail.
- Conquering Stress resources were made available in digital and binder format.
- Developed a bank of evidence-informed and/or evidence-based programs for delivery in classrooms.
- Worked with Safe Schools in the delivery of bullying prevention and healthy relationship programs and resources.
- Trained staff in evidence-based structured psychotherapy (Brief Interventions for School Counsellors Cognitive Behavioural Therapy and Virtual Counselling) to ensure effective

counselling for students.

- Trained staff in trauma-informed care and practices, and Shanker & Hopkins Self-Reg training.
- Maintained SO108 Partnerships.
- Attended regular meetings with community mental health agencies, Health Unit and McMaster Hospital.
- Managed and monitored Mental Health & Addictions Nurses referrals.

The following principles guide the implementation of the Child and Youth Mental Health Strategy in Grand Erie:

1. Achievement is fundamentally connected with student mental health and well-being.
2. Safe and inclusive school cultures will allow students to flourish.
3. Engagement among students, parents, staff and community is essential.
4. Commitment to ongoing learning for all is critical.
5. Evidence-based/informed practices will guide interventions to support students' mental health and well-being.
6. Align and coordinate efforts with community partners to maximize efficiency of resources and strengthen outcomes for students.
7. The unique strengths and needs of each school community will be honoured to ensure support is flexible and responsive.



Grand Erie’s Plan for Student Achievement and Well-Being:

Success for Every Student 2020-21

Multi-Year Plan Goals

- Increase staff understanding of effective instruction and assessment in literacy and numeracy
- Increase student understanding of effective learning strategies and how to use them
- Create and promote an enabling environment where all students can participate fully in their education.

Theory of Change

If students’ most urgent learning needs are identified and responsive strategies are implemented, then students will demonstrate improvement with their achievement.

Where Are We Now?

Needs Assessment Findings

Our focus will be to recognize overarching conceptual understandings across the strands to deepen our knowledge of spatial, proportional, and algebraic reasoning. Social emotional learning skills continue to need to be developed to help students develop confidence, cope with challenges and think critically. Students need to see themselves as capable and confident learners of mathematics.

Feedback from educators about their learning needs shows that professional learning at the system and school level should give educators the knowledge and skills to assess individual student needs and provide responsive, differentiated mathematics instruction. This provides opportunities for all students to understand mathematical concepts and processes that lay the foundation for problem-solving. Further findings indicate Grand Erie staff continue to seek to learn and acquire strategies to promote and support student mental health, productive disposition and well-being, while maintaining high expectations for mathematics achievement in the classroom.

Individual student learning gaps will continue to be identified and addressed with a continued focus on differentiated instruction and assessment in literacy. This focus enables students to develop explicit and implicit meaning in their reading and writing skills that are necessary to be successful in working towards the completion of the literacy credential required for graduation.

Feedback from educators about their learning needs shows that professional learning at the system and school level should give educators the skills to assess individual student needs and provide responsive differentiated literacy instruction.

How Did We Do?

K-12

Percentage of Grade 3 & 6 students achieving level 3 or 4 in Reading, Writing and Oral Language on report cards.

Percentage of Grade 3 & 6 students achieving level 3 or 4 in Mathematics on report cards.

Percentage of Grade 7 & 8 students achieving level 3 or 4 in Mathematics on report cards.

Percentage of students in Grade 10 Applied English achieving the Literacy Graduation Requirement on the Grade 10 OSSLT.

Percentage of students achieving 6/8 and 8/8 credits by the end of Grade 9.

Percentage of students achieving 12/16 and 16/16 credits by the end of Grade 10.

Monitor and measure the impact of the continued focus on tiered supports and strategies.

Monitor and measure the impact of the implementation of evidence-based Social-Emotional Learning programs on student well-being and achievement.

Narrative Data

School Effectiveness Framework Components & Indicators: 4.1 - A culture of high expectations supports the belief that all students can learn, progress and achieve.

1.1 - Assessment is connected to the curriculum, collaboratively developed by educators and used to inform next steps in learning and instruction.

How Will We Get There?

Professional, and Collaborative Learning – Superintendents and Central Teams will support/guide Principals and their multi-disciplinary teams through learning about and implementation of curriculum; supports, tools and resources to use effective differentiated instruction; ongoing assessment and reflection on student responses to instruction and feedback.

Mathematics Support for Ministry Identified Schools—The Principal Leaders, K-12 Board Math Lead; Board Math Facilitators; Elementary Consultants; and Secondary Math Facilitator will support elementary educators and Grade 9 Applied Teachers with their learning and implementation.

Principal and school multi-disciplinary learn teams will implement and, access additional resources to build instructional capacity. Principals and teachers will implement effective differentiated classroom instruction and assessment to meet individual student learning.

Wrap-around Support Staff *will work directly with educators and students to build capacity in mental health literacy and social-emotional well-being.*

Individual student needs: In maintaining and striving for high expectations in achievement and well-being for all learners, wrap around supports are provided to decrease barriers, in response to student needs.

How Will We Know?

The focus is on improved mathematics achievement. All of the following practices are expected to be evident for school based literacy achievement.

Educators implement effective differentiated instructional and assessment practices in a tiered response to individual student needs, supported by the leadership of the Principal.

Schools will be supported by system and principal leadership so that educators will effectively differentiate and accommodate instruction and assessment to meet needs identified in student profiles.

Staff members will develop skills in mental health literacy and an awareness of their own mental health.

Students know when to access and use calming strategies for their own emotional well-being.

How Are We Doing?

System

Family of Schools Superintendent and System Multi-Disciplinary Teams Learning Observations; Conversations.

Schools

Principal observations and reflections of instructional practice solicited throughout the implementation of strategies and the impact at the student level.

Evidence of teacher knowledge/skills/confidence/support for implementation in a variety of forms (reflections, observations, responsive actions, portfolios, professional dialogue and teacher surveys).

Principal and teacher dialogue and feedforward regarding taking initiative for implementation of their own professional learning goals and growth.

Evidence of continued implementation of Tier 1 interventions and classroom-based strategies before accessing outside supports.

Classroom

Triangulated student evidence in a variety of forms (observation, conversation, and products).

Students demonstrate social emotional learning skills that lead them to see themselves as capable and confident learners that cope with challenges and think creatively

Evidence of implementation of Tier 1 strategies to support Universal Design for Learning and the full participation of all students.



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SEAC C-1 (d) Input on the term "Special Education" Data

October 2021 Consultation

1. Should Grand Erie District School Board stop using the term "Special Education"?

[More Details](#)

Yes	23
No	21
Unsure	17



2. Why?

"Special" has developed a negative connotation

You are not call the individual "special " you are referring to the type of education that is being delivered to each individual with alternate needs.

Why the necessary adjective? isn't all of our education special? it's an outdated term referring to students who needed additional supports due to many different factors.

This term does immediately segregate the person it refers to. However, this could change. We who have disabilities don't want to be special. We want to be normal. We want to have the same opportunities that others have. If we have blended education and teachers who have experience dealing with a wide variety of disabilities this could work. I myself was in special ed, I have dylexia and ADD. I was the victim of this special education system which put us on little buses and treated all of us the same way with no specific modified curriculum to be found. This did irreparable harm to my future and I do not want this for anybody.

The term has never bothered me. I don't know of a term to offer as an alternative. I would rather change "learning disability" to 'learn differently"

The constant changes in names only confuse everyone

It is an antiquated term that carries negative connotations. Many students equate it with "being stupid" or "special". This includes students who have IEP's and are in a

regular classroom. Students do not want to be seen as "special" they want to be seen as "like" their peers.

I think a conversation needs to happen and further investigation. It is not a clear yes or no. I also feel that the Government needs to be a leader in this. GEDSB can stop using this term and that is a good step but not if there isn't full government support around a name change that includes a plan and path forward.

Because students with exceptionalities require a special approach. If you pick a new word, but don't teach everyone the value and dignity of all people, the new word will also risk the same negative connotation. Teach about stigma and ableism, but changing the name is an adventure in missing the point.

As a parent with a child with autism, this make them feel that they like they are not normal. This makes them feel like they do not fit into society of the school and they are centered out! the word 'special' is very degrading to my child

In my opinion the term 'special' does not have negative connotations, but rather, I would argue the opposite. According to the Oxford dictionary, 'special' is defined as something 'better, greater...' and certainly the services and supports offered by our spec ed departments are something to be admired.

Special needs = special education

There is nothing inherently wrong with the word "special" - it is just the associations and connotations that society creates that are negative. Whatever word is created to replace "special" will eventually develop the same associations and connotations. If anything, I think switching the word to something else will give it even more power - as it solidifies those connotations.

It doesn't matter what you call it. It's still the same thing. If you give it a sparkly new name, nothing will change except for the name. My child still needs help with his learning and he will go to the place where he has always gone and do the same things he does to get the help he needs.

Because I do have disabilities but I wanna be an average student with a normal class.

My son has special needs and special education means that he is getting the special help he need. More time with school work, test and more.

I don't personally have a problem with it, but I do think it may make some people feel uncomfortable.

Negative connotation of "Special", especially for students who are partially integrated with mainstream classes.

Need a term to identify student who need accommodations for their particular learning style. Adaptions to the school program which will allow these student success and give them skills that they can use out in our community.

It's not inclusive and further sets those students apart

Language is important and carries heavy weight/meaning. It affects individuals in different ways.

3. Provide some key words or a name that you think could be used to better represent the responsive interventions.

I would need to brainstorm this and have further conversation. I also feel we could change this at the Board level but it is the Ministry level that this needs to be done. We, as a Province, are still in the 1980's in terms of our language around this.

Alternate Education

Independent Education

Individual Education

Tailored Education

Aided Education

Exceptional Education

Supported Education

All access Assistive Equitable Supportive

exceptional education inclusive education

Get rid of labels entirely - "at risk", "spec ed" - they are simply students

I think that "specialized" or "individualized" education would better reflect that the program for their education is unique to that individual. This would help to explain that the learner's needs are unique to them in order for them to have the opportunity to meet with the most possible success.

good teaching practise

My Education

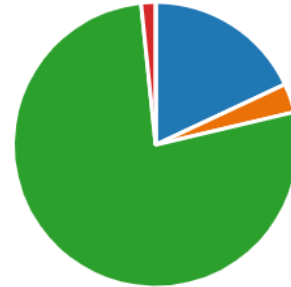
Learning differences, diversified learning, individualized learning, refocused learning, differentiated instruction

We as professionals know who is in Spec Ed or main stream that need the extra help. Stop with the labels. Listen to the students -they don't like it.

4. Who are you?

[More Details](#)

● Parent	11
● Student	2
● Board Employee	47
● Community Member	1
● Other	0





**Learning Disabilities Association of Ontario
submission on the initial recommendations from the
K-12 Education Standards Development Committee**

October 2021

The Learning Disabilities Association of Ontario (LDAO) and its community-based chapters represent the interests of persons with learning disabilities (LDs) throughout Ontario. In the publicly funded school system, students with LDs make up about 40% of students receiving special education supports and services, and many students with LDs go on to postsecondary studies at colleges or universities. LDAO welcomed the decision to add an Accessibility Standard for Education to the standards already in place under the Accessibility for Persons with Disabilities Act (AODA) and has been following the progress of the K – 12 and Postsecondary Standard Development Committees (SDCs).

LDAO commends the work of the SDCs in their thorough review of the many issues and barriers facing students with disabilities in education. There are many excellent recommendations in their 2021 interim recommendations reports.

The following are comments and suggested changes for the K – 12 Interim Recommendations report, based on consultation with the LDAO Legislation and Policy Committee. Feedback on recommendations of the Transitions subcommittee and Postsecondary SDC will be submitted separately.

Overall comments

- There are recommendations in different sections of the SDC Interim Recommendations document that overlap and need to be aligned.
- The volume of recommendations will be challenging for school boards to digest and implement, so follow-up and accountability measures will be important.
- LDAO recognizes that there have been strides in teacher pre-service training and on-going professional development over recent years, but at this point understanding of students with exceptionalities is still not consistently embedded in educators' academic experiences.

**Section one: Attitudes, behaviours, perceptions and assumptions and
Section two: Awareness and training**

Sections 1 and 2 both address **educator professional development and training**. LDAO supports these recommendations with the following comments:

- LDAO agrees that pre-service and in-service training of educators needs to address the “philosophy of equity, accessibility and the inclusion of and full participation by students with

disabilities” (3.1) and “Universal Design for Learning” (6) *but it is also very important for educators to learn to differentiate instruction to meet the individual needs of students.*

- Special Education Core content in pre-service education must be mandatory and be taught by educators with relevant training in special education.
- Special Education Core content in pre-service education must include detailed information on a wide range of disability needs and an understanding of how to individualize supports to meet each student’s unique disability needs.
- Universal Design for Learning needs to be taught in a way that is based on scientific evidence.
- There should be accountability mechanisms for what is taught in both pre-service and Additional Qualification (AQ) courses, e.g through student survey results that are made available to the College of Teachers.
- The content included in the Special Education Part 1 AQ should be included in preservice training.
- LDAO strongly supports pre-service and in-service training for educators on “how to use, interact with, and support the use of adaptive/assistive technology” (8.2). This recommendation should align with recommendations 32 and 33 in Section 4.

Section three: curriculum, assessment and instruction

Diversity and accessibility in design and development

LDAO supports recommendations 9 and 10 with the following comment:

- Curriculum design needs to incorporate Universal Instructional Design principles that are based on scientific evidence.

Learning resources and self-assessment

LDAO supports the recommendations in 11 with the following comments:

- There needs to be clarity on the responsibility of individual teachers in developing classroom materials that are accessible versus school board responsibility for its developed materials.
- Sharing of conversion-ready materials in accessible formats among school boards (11.6) is very important and should be included in the Accessibility Hub (20).

Professional learning and development

LDAO strongly supports recommendations 13 and 14 with the following comment:

- The importance of Differentiated Instruction, in addition to Universal Design for Learning, is appropriately highlighted in these recommendations.

Student voice in barrier-free policy and practice

LDAO strongly supports the recommendations in 15 and 16 with the following comment:

- There needs to be clarity about the availability of accommodations to students in any situations where assessments are not yet barrier-free.

Early and on-going assessment for students with disabilities' needs

LDAO strongly supports the recommendations in 17, with the following comments:

- In addition to eliminating access barriers to timely assessments for the identification of disability related need, there must be early screening, with teachers having access to effective screening tools. Screening for possible disability needs in kindergarten and primary grades should lead to early interventions in a tiered approach. Students whose needs are not met by early intervention should then have access to timely assessments.
- Assessments of disability need should be ongoing to assess any changes in needs, and not limited to initial identification. However, re-assessments should not be necessary to confirm identification.

Interactive communication in accessible learning environments

LDAO supports the recommendations in 18 and 19 with the following comment:

- “accessible curriculum and assessment-informed instructional strategies for a wide range of abilities and needs” (19.2) – the concept of differentiated instruction should be emphasized.

Accessibility hub and shared practices

LDAO strongly supports the recommendations in 20 and 21.

Teaching and learning about human rights and disability.

LDAO supports the recommendations in 22 and 23.

New and specialized programs

LDAO supports the recommendations in 24 with the following comment:

- For students with disabilities in French Immersion, special education supports including remediation should be available in French.

Physical health and wellness, mental health and well-being

LDAO strongly supports the recommendations in 25.

Specialized alternative and expanded curriculum and pathways

LDAO supports the recommendations in 27 and 28 with the following comment:

- Access to regular academic curriculum with appropriate accommodations should always be the first option considered for a student.

Resource development and improvement planning.

LDAO strongly supports the recommendations in 29 and 30.

Section four: digital learning and technology

Professional development and training on accessible digital technology

LDAO strongly supports recommendations 32, 33 and 34 with the following comments:

- Professional development and training of educators needs to be compulsory.
- For students with learning disabilities to succeed with assistive technology classroom teachers and educational assistants need to understand how to use these technologies.
- Parents of students using assistive technology need to be included in training.
- Educators need to be aware of the services offered by Alternate Education Resources Ontario (AERO) <http://alternativeresources.ca/Aero/Public/WelcomePage.aspx>.

Accessible digital and technology action plan

LDAO strongly supports recommendations in 35 with the following comments:

- Recommendations should align with those made by the Information & Communications Standards Development Committee in their review, e.g. 35.9 “any textbook used in any learning environment must be accessible to teachers and students with disabilities at the time of procurement”.
- The statement in 35.11 “If a textbook is available in print, the publisher should be required to provide the digital version of the textbook in an accessible format at the same time the print version is delivered to the school/Board” should be a stand-alone recommendation, to align with recommendations of the Information & Communications SDC.

- LDAO strongly supports recommendation 36 to the Ministry of Education on providing sufficient long-term funding to support boards in acquiring and supporting assistive technologies and related hardware and software.
- LDAO strongly supports recommendations in 37 to the Ministry of Education on training programs to support boards. LDAO comments on recommendations 32, 33 and 34 would apply here as well.
- LDAO strongly supports recommendations in 38 and 39 to the Ministry of Education on removing digital learning and technology barriers.

Section five: Organizational barriers

Compliance with the *Accessibility for Ontarians with Disabilities Act, 2005*, the *Ontario Human Rights Code* and the *Canadian Charter of Rights and Freedoms*

LDAO supports the recommendations in 40 with the following comments.

- The provisions in 40.1 must in no way diminish the eligibility for special education processes and services that are currently available to students with special education needs.
- Broadening the definition of accommodations in 40.2 must take into account the important difference between accommodations and modifications. Educators need to understand that accommodations do not change the curriculum expectations while modifications do. This distinction is particularly important as students transition to postsecondary studies, where accommodations must respect the essential requirements of a course.

Inter-ministry collaboration: to ensure students with disabilities receive the support they need from other ministry-funded services at school.

LDAO supports the recommendations in 41.

Accountability

LDAO strongly supports the recommendations in 42 with the following comments:

- The Ministry of Education needs to have a strong role in ensuring accountability of school boards in accommodating students with disabilities up to the point of undue hardship.
- “Creation of an ombudsman/oversight office where students’ and parents’ concerns regarding the provision of education for students with disabilities can be investigated and resolved” (42.2) is an important accountability measure that should exist at the school board and ministry level. Such mechanisms should be available for students who are currently eligible for special education supports and services.

- The Ministry of Education can look for guidance to the recommendations of the *Provincial Advisory Committee on Formal Dispute Resolution Regarding Special Education Programs and Services*.

Individual Education Plan

LDAO supports the recommendations in 43 to 48 with the following comment:

- The Ministry of Education should consult stakeholders, including parents, students, educators, parent associations and SEACs when revising the format and content of the Individual Education Plan (44).

Parent and student participation

LDAO strongly supports the recommendations in 49 with the following comments:

- Effective communication between parents and the school is vital and will be facilitated by all these recommendations.
- A school board level dispute resolution mechanism is very important and needs to be mandated by the Ministry of Education. Information on how to access the dispute resolution process must be publicly available to parents.
- Parents and students need to have access to both self-advocacy training and system navigators.

Exclusions/refusals to admit to school/reduced school hours

LDAO supports the recommendations in 50.

Data collection

LDAO supports the recommendations in 51.

School board accessibility committees and plans

LDAO supports the recommendations in 53 with the following comment:

- “52.6. the Ministry of Education should be required to designate an office or role, such as an assistant deputy minister, responsible for achieving a barrier-free and accessible school system for students with disabilities.”
An Accessibility Secretariat, in the model of the Equity Secretariat, could serve this purpose.

Professional learning

LDAO supports the recommendations in 53 with the following comments:

- Recommendations for training and professional development in Sections 1, 2, 3, 4 and 5 should be grouped together and aligned. LDAO comments on these topics in all these sections would apply to Professional Learning in Section 5.
- Recommendations 53.9, 53.10 and 53.11 supporting parent engagement, advocacy skills and collaboration between parents and educators are very important.

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

LDAO has some concerns about the recommendations in 54, 55 and 56, as follows:

- Any review of the identification, placement and review committee process and regulation needs to be done very carefully and not diminish any rights that are currently in place, e.g. for students who would not qualify as a student with a disability. Legal protections for parents need to be retained.
- A review panel should include representatives from parent associations who have members on Special Education Advisory Committees.
- LDAO strongly agrees with the principles outlined in 56, but believes it should be possible to implement these principles within the current framework.

Section six: Social realms

Educational and online events

LDAO supports recommendation 57.

Transitions facilitator/navigator

LDAO strongly supports recommendations 58 and 59 with the following comment:

- Recommendation 58 on the transition facilitator/navigator role should be aligned with Recommendation 12 of the Transitions Technical Sub-committee, and should include support for transitions within and out of the K-12 system.
- Recommendation 59 on a Transitions Hub should align with Recommendation 29 of the Transitions Technical Sub-committee.

Transportation

LDAO supports the recommendations in 60 and 61, especially as they relate to the need to communicate with parents.

Bullying/cyberbullying workshops

LDAO supports recommendation 64 with the following comment:

- Development of Bullying/cyberbullying workshops should also be informed by consultation with families of students with disabilities.

Experiential / co-op learning opportunities

LDAO strongly supports the recommendations in 65.

Social isolation

LDAO supports recommendation 67 with the following comments:

- Staff assistance for social interaction and play needs to be informed by parental input on student needs and on strategies that have proven effective or ineffective.
- All educators and staff who interact with a student should be aware of social goals as outlined in the student's IEP. There should be a school community approach.
- Educators or other staff who offer assistance for social interaction and play need to have specific training for this role. Training could be informed by the York Region DSB Unstructured Time Chart (attached).
- Social skills training for students should be included in the social goals in their IEP.

Section eight: Planning for emergencies and safety framework

LDAO strongly supports the need to plan in advance for emergency situations, such as the Covid-19 pandemic, and supports the recommendations in Section 8 with the following comments:

- The Ministry of Education must continue to provide very specific guidelines to school boards on accommodating students with disabilities when regular schooling is disrupted.
- Planning by the Ministry of Education must coordinate with the Ministry of Health and Ministry of Children, Community & Social Services in order to maintain school-based health and mental health services when students are not in school.

Section nine: timelines and accountability

LDAO strongly supports the recommendations for accountability measures with the following comments:

- The mechanisms to receive complaints and concerns should align with the dispute resolution mechanisms at the Ministry of Education and school board levels described in Section 5. Rapid response processes should be available at the Ministry of Education and school board levels as well as through the Accessibility Directorate of Ontario (189).

- LDAO supports the role the Ministry of Education should play in enabling the timely implementation of the Standards for school boards and the College of Teachers (194). An Accessibility Secretariat, in the model of the Equity Secretariat, could facilitate this process.

Respectfully submitted,

Lawrence Barns, President & CEO
Learning Disabilities Association of Ontario
www.LDAO.ca



Learning Disabilities Association of Ontario submission on the Initial recommendations of the Education Technical Sub-Committee on Accessible Transitions

The Learning Disabilities Association of Ontario (LDAO) welcomes the opportunity to provide feedback on the recommendations of the Education Technical Sub-Committee on Accessible transitions, based on input from the LDAO Legislation and Policy Committee.

LDAO strongly supports the importance of transition planning and supports for students with disabilities including students with learning disabilities.

Transitions to and within K-12

LDAO supports recommendations 1 to 20 with the following comments:

- LDAO strongly supports the role of the Ministry of Education in developing and sharing with school boards transition resources as outlined in 1 to 6. Included in the repository should be the Transition Resource Guide for Students with Disabilities:
www.transitionresourceguide.ca/.
- The Ministry of Education should have a role in developing and sharing with school boards curriculum resources as outlined in (7) and (8). School boards should be mandated to develop *and utilize* such resources.
- LDAO strongly supports the focus in (8) on the development of learning skills including executive functioning skills (for example, emotional and physical self-regulation, working memory, self-monitoring, organizational planning and prioritizing, and task initiation). Development of these skills needs to begin in the elementary grades.
- LDAO supports keeping options and pathways open to postsecondary education and employment (9) for students with learning disabilities. It is important that this process starts in elementary school by allowing students to access grade level curriculum with accommodations (including assistive technology) rather than offering only modified curriculum expectations.
- LDAO strongly supports the concept of a Transition Facilitator/Navigator role at the school board and at the school level (12). This recommendation needs to be aligned with similar recommendations in Section 6 of the K - 12 Recommendations and with the postsecondary Transition/Navigator positions outlined in recommendation 37 of this document.

- LDAO strongly supports recommendations that promote development of learning strategies and self-advocacy skills for students (15 -19).
- Review of curriculum and learning expectations (17) should adapt development of self-advocacy/self-awareness/resiliency skills to different courses and levels of education.
- Students should disclose their *disability needs* rather than their disability (18).
- Instruction development for educators and students (19) should take into account intersectionality with race, religion and gender identity.
- LDAO strongly supports the importance of accommodations and supports in co-operative education (13) and in summer and night school courses (20).

LDAO supports recommendations 21 to 26 with the following comments:

- While parents and students need to be aware of the need for updated assessments for postsecondary purposes, the recommendations do not address the issue of inequitable access to updating assessments. Options presented are not available to all families.
- LDAO points out that recommendation 26 is inaccurate. Students do not “need an identification, placement and review committee if they will be requesting accommodations when they enter postsecondary education” and parents need to be aware that an IPRC identification is insufficient by itself to access accommodations at postsecondary, although sometimes interim accommodations can be accessed pending documentation.

LDAO supports recommendations 27 and 28 with the following additions:

- Students should be advised to contact the Accessibility office as soon as they are accepted at a postsecondary institution in order to understand processes such as OSAP application issues.
- Students need to be aware of the requirement of a Disability Verification Form through OSAP in order to be eligible to access BSWD/CSG-PDSE funding. Getting this form completed might have a cost and/or it could be completed at the time of an updated assessment.
- Information should be added in (27) about the resources available for assessment through the Regional Assessment and Resource Centre (RARC) and the Northern Ontario Assessment and Resource Centre (NOARC), as noted in recommendation 28.
- Regional Assessment Centres could work with the school boards in grade 11/12 to ensure that the assessments were valid and supportive for the remainder of the secondary career, as well as for postsecondary purposes.
- It would be helpful for students and parents to have a flow chart to help understand the processes described in this recommendation.

Transitions from K-12 to postsecondary education

LDAO supports Recommendations 19 – 35 with the following comments:

- For consistency Recommendation 29 should align with Recommendation 59 in Section 6 of the K – 12 recommendations.
- A centralized transitions hub (29) should include the Transition Resource Guide for Students with Disabilities: www.transitionresourceguide.ca/.
- Enhancement of existing transition programs (33) should include several options for when and how students can access transition programs, from transition credits offered in secondary school, to summer programs and ongoing programs during the initial postsecondary year. These should be available in both in-person and virtual formats.
- Under the list of components to be included in transition programs (33), “understanding how to manage synchronous/asynchronous course work” and “navigating learning management systems” are core components that should not be a subset of “articulating and negotiating accommodation needs with peers in group work.”

LDAO supports Recommendations 36 – 47 with the following comments:

- LDAO strongly supports the need for ongoing collaboration between the Ministry of Education and the Ministry of Colleges and Universities.
- LDAO supports the funding of transition/navigator positions (37) with the provision that this would be a different role from accessibility counsellors, and funded separately.
- Recommendation 41 suggests that the Ministry of Education should budget for students with disabilities in grade 11 or 12 to receive new or updated formal professional assessments. There should be a more specific recommendation on school board funding at the secondary level for such assessments.

Transitions from secondary school to the workplace and community

LDAO supports Recommendations 63 – 69 in principle.

Alternative transition programs/pathways

LDAO supports recommendations 70 – 75 in principle.

Respectfully submitted,

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**Learning Disabilities Association of Ontario
submission on the initial recommendations from the
Postsecondary Education Standards Development Committee**

The Learning Disabilities Association of Ontario (LDAO) and its community-based chapters represent the interests of persons with learning disabilities (LDs) throughout Ontario. In the publicly funded school system, students with LDs make up about 40% of students receiving special education supports and services, and many students with LDs go on to postsecondary studies at colleges or universities. LDAO welcomed the decision to add an Accessibility Standard for Education to the standards already in place under the Accessibility for Persons with Disabilities Act (AODA) and has been following the progress of the K – 12 and Postsecondary Standard Development Committees (SDCs).

LDAO commends the work of the SDCs in their thorough review of the many issues and barriers facing students with disabilities in education. There are many excellent recommendations in their 2021 interim recommendations reports.

The following are comments and suggested changes for the Postsecondary Recommendations report, based on consultation with the LDAO Legislation and Policy Committee.

Overall comments

- Staff in Offices for Students with Disabilities (Accessibility offices) are already implementing many of the recommendations but there needs to be consistency across the province.
- Recommendations need to come with start-up funding, to make sure resources are not taken away from existing services for students with disabilities. Such funding may include covering extra staff time in accessibility offices.
- There should be funding for accessibility leads at colleges and universities.
- Implementation of recommendations needs to be gradual so that colleges and universities are not overwhelmed by many changes at once. Colleges and universities need to be able to demonstrate evidence that they are in the process of implementing recommendations in the designated timeline.
- The successful implementation of the 2003 recommendations of the Learning Opportunities Task Force (LOTF) can be a useful model for implementation of these Postsecondary recommendations.
- The College Committee on Disabilities Issues (CCDI) and the Inter-University Disability Issues Association (IDIA) should be involved in implementation and accountability.

- The establishment of an Accessibility Secretariat, in the model of the Equity Secretariat, could be an important step in ensuring implementation of both the K-12 and Postsecondary Recommendations.

Barrier area 1: Attitudes, behaviours, perceptions, assumptions

Theme 1: Transformational leadership

Recommendation 7: Change management plan

LDAO supports the recommendation with the following comments:

- There would need to be funding for leadership.
- The designated timeline may not be realistic for implementation in a meaningful way.

Recommendation 8: Communication strategy on commitment to accessibility

LDAO supports the recommendation.

Recommendation 9: Infrastructure and resources (non-regulatory)

LDAO strongly supports the recommendation, particularly:

- increasing support to the services for students with disabilities including the Accessibility Fund for Students with Disabilities.
- Training disability-specialized career centre staff and expand programming to support student transition to employment.

Capacity building activities could include providing supports such as formats.

Recommendations 10 - 11

LDAO supports these recommendations.

Theme 2: Accountability: Metrics and performance measures

Recommendations 12 -13

LDAO supports these recommendations with the following comments:

- Developing or updating an existing accessible standardized campus climate instrument should be done in consultation with CCDI and IDIA.
- There should be an opportunity for colleges and universities to adapt the standardized instrument, e.g. adding additional items while maintaining consistency with the basic instrument.

- Efforts should be made to prevent 'survey fatigue', e.g. by administering to different representative samples in different years.

Recommendation 14: Establish a committee

LDAO supports this recommendation with the following comment:

- Committee membership needs to include representation from faculty, and from students with disabilities specifically.

Recommendation 15: Representation data collection

LDAO supports this recommendation with the following comments:

- The list of primary disabilities must include learning disabilities specifically, as they do not fit under the categories given as examples.
- There needs to be clarity on how any data would be gathered on human rights complaints, e.g. at the institution's Human Rights office or the Human Rights Tribunal of Ontario.

Recommendation 16: Metrics and performance measures

LDAO supports this recommendation with the following comments:

- Performance measures should include the number of students with disabilities who dropped courses, at what stage, and the reasons.
- Data collection and analyzing will require funding support.

Theme 3: Research and scholarship

Recommendation 17: Research and scholarship (non-regulatory)

LDAO supports this recommendation.

Theme 4: Awareness

Recommendation 18: Awareness

LDAO supports this recommendation.

Theme 5: Language

Recommendation 19: Language

LDAO supports this recommendation with the following comments:

- The new definitions in the glossary of terms need to be periodically reviewed and updated.
- Individuals with disabilities must have the right to choose the words that apply to themselves.

Barrier area 2: Awareness and training

Theme 1: Government leadership

Recommendations 20 - 22

LDAO supports these recommendations on employee training, with the following comment:

- The training described in 22 should lead to professional development goals involving accessibility, which should be reviewed in annual performance evaluations.

Theme 2: Training for specific audiences

Recommendation 23: Educators

LDAO supports this recommendation with the following comments:

- The institution's specific accommodation and appeal processes should be included in training.
- "textbooks" should be replaced by "teaching materials" in point 3, to be more inclusive.
- Educators should be aware of the resources available to students through *Alternate Education Resources Ontario (AERO)*.
- Professional development for educators should be ongoing, not just renewed every 3 years.

Recommendation 24: Postsecondary Education administrators and leadership

LDAO supports this recommendation with the following comment:

- It is very important that education administrators are accountable for faculty decisions that affect accommodations of students with disabilities.

Recommendation 25: Disability services staff

LDAO supports this recommendation with the following comments:

- Professional development should be ongoing, not just renewed every 3 years.
- Training on transition should include transitions into and out of postsecondary studies.

Recommendation 26: Career counsellors/advisors

LDAO strongly supports this recommendation.

Recommendation 27: Media/creative arts staff

LDAO supports this recommendation.

Recommendation 28: Information technology/communications

LDAO supports this recommendation with the following comment:

- Training should include a review of accessibility issues related the employee's specific area of work.

Recommendation 30: Event planners and hosts

LDAO supports this recommendation.

Barrier area 3: Assessment, curriculum and instruction

Theme 1: Pedagogy/andragogy

Recommendations 31 - 32

LDAO supports these recommendations on accessibility standards for teaching and learning.

Recommendation 33: Employable skills for students with disabilities in alternate pathway programs

LDAO supports the importance of employability skills but the intent of this recommendation is not clear, e.g. who would be responsible for completion of a portfolio of employability skills, and how employability skills would be assessed.

Theme 2: Accessible format educational materials

Recommendations 34 - 39

LDAO strongly supports all these recommendations, which are vital to the success of students with learning disabilities. The following additional comments are offered:

- All educational materials that are in current use, despite publication date, need to be made accessible.
- Support to convert educational materials to accessible formats needs to be available on campus, and all education staff need to be made aware of the service.

Recommendations 37 - 38

LDAO supports the role of the Ontario government in developing training resources on accessible documents and multimedia resources and in providing dedicated funding to the universities and colleges to support these standards.

Theme 3: Institutional responsibility

Recommendation 40: Linking assessments to essential academic requirements

LDAO strongly supports this recommendation with the following additional comment:

- Information on how each assessment connects to the essential academic requirements needs to be included in the student course outline/syllabus.

Recommendations 41 - 43

LDAO strongly supports all these recommendations with the following additional comment:

- Ensure that all education staff know about the dedicated experts on accessible and inclusive pedagogy/andragogy.

Theme 4: Quality Assurance**Recommendation 44: Adherence to accessible and inclusive pedagogy/andragogy standards**

LDAO supports this recommendation.

Recommendation 45: Identification and communication of bona fide and essential academic requirements

LDAO strongly supports this recommendation.

Recommendations 46 - 48

LDAO supports these recommendations.

Theme 5: Diversity of learning environments**Recommendation 49: Specialized discipline hubs (Science, Technology, Engineering and Mathematics, trades, healthcare and the arts) (non-regulatory)**

LDAO supports this recommendation.

Recommendation 50: Virtual and in-person labs and simulations (non-regulatory)

LDAO strongly supports this recommendation.

Recommendation 51: Symposia, seminars, colloquia and conferences

LDAO supports this recommendation.

Recommendation 52: Graduate supervision

LDAO strongly supports this recommendation and the importance of accessibility for graduate students.

Recommendations 53 - 57

LDAO supports all these recommendations.

Recommendation 58 - 63

LDAO supports all these recommendations.

Barrier area 4: Digital learning and technology

Theme 1: Accessible technology

Recommendations 64 - 67

LDAO strongly supports all these recommendations on usability of accessible technology and addressing barriers.

Theme 2: Accessibility plan

Recommendations 68 - 69

LDAO supports these recommendations on digital learning and technology planning.

Recommendation 70: Equitable access to digital technology

LDAO strongly supports this recommendation with the following additional comment:

- The institution must take responsibility for navigating funding options rather than leaving it up to the student.

Recommendation 71: Identify and communicate digital learning and technology intentions

LDAO strongly supports this recommendation with the following additional comment:

- The instructor should be responsible to address any accessibility issues with new technology introduced in class.

Recommendations 72 - 75: Accessibility of the technology

LDAO supports all these recommendations.

Theme 3: Accessible procurement support (non-regulatory)

Recommendations 76 - 77

LDAO supports these recommendations with the following comment:

- Accessibility design criteria and features for procurement should align with criteria in the Information and Communications Standard, particularly Section 14.

Theme 4: Accessibility training/practice

Recommendation 78: Time to practice and learn digital learning and technology accessibility features

LDAO supports this recommendation.

Recommendation 79: Mitigation of technology barriers

LDAO supports the need for an accessible feedback, tracking and reporting mechanism for students but recommends that feedback go to the accessibility office for follow-up, in addition to the accessible digital technology lead.

Recommendation 80: Assessment methods

LDAO strongly supports this recommendation.

Theme 5: Accessibility and inclusive pedagogy/andragogy

Recommendation 81: Accessibility of digital teaching and learning tools

LDAO offers the following comment:

- In addition to following Universal Design principles digital tools must allow for differentiation of instruction by the instructor.

Recommendation 82: Digital teaching and learning tools barriers

LDAO supports this recommendation.

Recommendation 83: Usability of digital learning and technology environments

LDAO is unclear how this recommendation relates to students with disabilities specifically.

Theme 6: Accessible content

Recommendations 85 - 87

LDAO supports all these recommendations.

Barrier area 5: Organizational barriers

Theme 1: Admission and accommodation processes

Recommendations 89 - 90

LDAO supports these recommendations on transition supports and admissions processes.

Recommendation 91: Access to disability accommodation information

LDAO strongly supports this recommendation.

Recommendation 92: Documentation policies for academic accommodations

LDAO supports the need for consistency in documentation policies and processes for determining access to accommodations. This a complex issue. [Ontario Human Rights](#)

[Commission's Policy on Accessible Education for Students with Disabilities \(March 2018\)](#), section 8.7 outlines a nuanced process rather than a set of strict criteria.

LDAO supports the need for postsecondary institutions to “develop 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.” Postsecondary institutions must have the flexibility to evaluate eligibility on a case-by-case basis following these consistent policies and practices.

Attention must be paid to the inequitable financial barriers to documentation for students with learning disabilities, especially those who do not qualify for the BSWD/CSG-PDSE.

Recommendation 93: Interim academic accommodations

LDAO strongly supports the provision of interim accommodations as outlined in the institution's practices. This is particularly important for students with learning disabilities, who may face many barriers in accessing assessment needed for documentation.

Recommendation 94: Full participation

LDAO supports this recommendation.

Recommendation 95: Clear policies and procedures

LDAO strongly supports these recommendations for the collaborative development of clear policies, procedures and best practice guidelines for accessing accommodations across all academically related learning activities.

Recommendation 96: Disability accommodation plans

LDAO supports a student-centred approach to development of accommodation plans, while maintaining the right to have a support person at meetings if the student requests this.

Recommendation 97 - 98: Disability accommodation caseload

LDAO strongly supports the need to address the increasing caseloads of Student Accessibility Services (SAS) staff, which is leading to lack of access for students to needed supports.

While a system caseload study may be warranted, this should not delay additional funding to the Accessibility Fund for Students with Disabilities to achieve reasonable client loads.

There is a danger that SAS services would need to deny access to services to eligible students in order to keep caseloads low.

Recommendation 100: Report on training

LDAO supports this recommendation.

Recommendation 101: Rights and needs of students with disabilities

LDAO strongly supports this recommendation.

Recommendation 102: Alternate program pathways

LDAO supports this recommendation in principle with the following comments:

- All programs need to be clear on bona fide program requirements.
- Since the issue of bona fide program requirements is complex, decisions on alternative pathways need to be made on a case-by-case basis, in consultation with the Accessibility office.

Recommendation 103: Transparent policies and procedures

LDAO supports this recommendation.

Recommendation 104: Accessible procurement policies and procedures

LDAO supports this recommendation but points out that accessible procurement standards for educational resources must align with **Recommendation 26: Purchase of accessible teaching/training materials** of the *Review of the Information and Communications Standards: 2020 Final Recommendations Report*.

Recommendation 105 - 106

LDAO supports these recommendations for alignment with procurement requirements in the Integrated Accessibility Standards Regulation, O. Reg. 191/11 (IASR) and procurement recommendations of the *Review of the Information and Communications Standards: 2020 Final Recommendations Report*.

Recommendation 107: Review policies and procedures

Comment Re: "Postsecondary institutions shall adopt an academic conflict resolution process for accessibility-related disputes that fall outside the classroom learning environment, for example in research labs, fieldwork or work integrated learning settings."

- Accessibility-related disputes involving placements outside the educational institution are complex and may require negotiation/mediation on the part of the Accessibility office.

Theme 3: Handling of accommodation requests

Recommendation 108: Accessibility and accommodation coordinator/champion

LDAO agrees with the goals of this set of recommendations but does not believe the specifics are realistic. In order to develop a culture of accessibility, institutions need to create their own structures to promote accessibility compliance in ways that work for them.

Recommendation 109: Refusal of disability accommodation request

LDAO supports the principle of transparency but has concerns that requiring written reasons for every accommodation request, as well as the proposed timelines, may be unrealistic. A tiered approach should be developed with written responses being required in stages of a dispute resolution process such as outlined in Recommendation 110.

Recommendation 110: Resolving disability accommodation refusal disputes

LDAO agrees in principle with this recommendation with the following comments.

- The tiered review process does not need to be so prescriptive, so we recommend replacing the word ‘should’ with ‘could’ in the sentence “This tiered review process should include the following”.
- In (d) a concern that it is not appropriate to include the Faculties of Education in in the list of possible leaders of initial review and dispute resolution processes.

Theme 4: Inclusive teaching and learning environments

Recommendation 111: Accessible education training

LDAO supports this recommendation with the following addition:

- “Universal Design in Learning” needs to be accompanied by ‘Differentiated Instruction’.

Theme 5: Service animals

Recommendation 112: Service animal definition for postsecondary institutions

LDAO supports the need for clarity on the definition of service animals.

Recommendation 113: Service and support animals policies and procedures

LDAO supports policies and procedures that include a tiered approach to decision-making on service and support animals.

Theme 6: Business continuity plans

Recommendation 114: Business continuity plans

LDAO supports this recommendation.

Respectfully submitted,

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Submission on the initial recommendations from the K-12 Education Standards Development Committee

A group of provincial parent organization worked together on this submission, following the release for the public consultation, through their connections at PAAC on SEAC, and their common interest in the important role of SEAC. Representatives from the following organizations reviewed and supported this submission:

- Association for Bright Children of Ontario
- AFPED+ Association francophone pour parents d'enfants ayant un trouble d'apprentissage
- Easter Seals Ontario
- Learning Disabilities Association of Ontario
- FASD-ONE Education Action Group
- Down Syndrome Association of Ontario
- Hydrocephalus Canada
- Ontario Association for Families of Children with Communication Disorders

This response starts with a few overall comments that speak to the importance of engaging SEACs and families as well as reducing stigma and enhancing professional development among other issues. More specific points related to individual recommendations follow.

Overall comments

- School board consultations should include parents/guardians/caregivers in addition to students with disabilities.
- Students with disabilities involved in consultations must be provided with appropriate accommodations and supports, such as outlined in their IEP. These could include interpretation and cultural support, assistive technology, support workers, sight/hearing support, person assisted language.
- Any school board level committees or oversight/review should include SEACs.
- Any time that Universal Instructional Design is mentioned in the recommendations Differentiated Instruction should also be mentioned. Both are needed.
- We strongly support recommendations on accountability, public reporting, transparency, and follow up both at the school board and Ministry of Education level. For example, when a school board is required to “ensure” something, mechanisms need to be put in place by the Ministry of Education which have evidence and data gathering for accountability and reporting, and which include meaningful participation of SEAC.

- We strongly support the emphasis on training and professional development for education staff, as outlined in several sections. Such training will only be effective if it is ongoing and mandatory.

Section one: Attitudes, behaviours, perceptions and assumptions

- The issue of stigma needs to be addressed under this section
- 1.1 should include parents/guardians in addition to students with disabilities.
- Teachers need to learn principles of universal design for learning as well as differentiated instruction as part of their university program in education (2.1).
- Special Education Core Content must include detailed information on a wide range of disability needs and an understanding of how to individualize supports to meet each student's unique disability needs (2.2).
- This training to school board staff should be mandatory for staff (3.1).

Section two: Awareness and training

- Training should include both Universal Design for Learning and Differentiated Instruction in order to meet individual disability needs. Consultation should include families of people who self-identify as having a disability (6).
- PAAC on SEAC could provide valuable input into the development of the training module (7).
- We strongly support recommendations 8.1 and 8.2.
- Should align with recommendations 32 and 33 in Section 4

Section three: curriculum, assessment and instruction

We generally support these recommendations, with specific focus on the following:

Diversity and accessibility in design and development recommendations (9 & 10)

- We strongly support the recommendations in 9.5, particularly c, h, and i.

Learning resources and self-assessment recommendations (11 & 12)

- We strongly support all the recommendations in 11 and 12.

Professional learning and development recommendations (13 & 14)

- We strongly support recommendations 13 and 14.

Student voice in barrier-free policy and practice recommendations (15 & 16)

- We strongly supports the recommendations in 15 and 16.

Early and on-going assessment for students with disabilities' needs recommendations (17)

- We strongly support the recommendations in 17. In addition to timely access to assessments there should be early screening and intervention as part of a tiered approach to assessment.
- Attention should be given to the need for ongoing and updated assessments as well as initial assessments of disability needs.

Interactive communication in accessible learning environments recommendations (18 & 19)

- We strongly support recommendations 18 and 19 but there needs to be more clarity in 19 on the need for accessible online formats.

Accessibility hub and shared practice recommendations (20 & 21)

- We strongly support sharing of research-informed practices.
- Consideration should be given to aligning such an accessibility hub with other hubs recommended by the K-12 SDC and the Transitions technical subcommittee.

Physical health and wellness, mental health and well-being recommendations (25)

- We strongly support the recommendations in 25, and in particular 25.6.

Specialized alternative and expanded curriculum and pathways recommendations (27 & 28)

- Alternative programming needs to be individualized to student and focus on building independence and successful interdependence and self-advocacy
- Curriculum and learning expectations in alternative curriculum should be individualized based on assessment of student strengths and needs.
- We strongly support recommendation 28.

Resource development and improvement planning recommendations (29 & 30)

- We strongly support the recommendations in 29.

Long term objectives and timeline alignment for curriculum, instruction and assessment recommendations (30)

- School board annual review processes should include consultation with SEACs

Section four: digital learning and technology

Section four recommendations 32 & 33

- Recommendation 32 should include consultation with SEACs.
- Accessible technology training for educational staff must be mandatory and ongoing (33).
- Accessible technology training should be offered to students and parents/caregivers in addition to staff (33).

Accessible digital and technology action plan (35)

- We strongly support the recommendations in this section
- 35.1 to 35.13 should be specific recommendations, not just 'examples'.
- The following should be included in 35.9 as well as in 35.11: "if a textbook is available in EPUB format, the textbooks must meet the international standard for that file format. For EPUB it is the W3C Digital Publishing Guidelines currently under review. If a textbook is available in print, the publisher should be required to provide the digital version of the textbook in an accessible format at the same time the print version is delivered to the school/Board"
- 35.12. "ensure that students who are provided assistive technology for use at school can also take them home for home use as well" – very important, and should include SEA claim-based equipment as well.

Recommendations for the Ministry of Education (36 – 39)

- We strongly support recommendation 36.
- We support the role of the Ministry of Education in developing training programs for school boards on use of assistive technologies. Development of such training could incorporate effective practices from existing school board training programs (37)
- We strongly support the recommendations in 38.1 to 38.5 on removing barriers.
- We strongly support the recommendations in 39.1 to 39.4 about accessible virtual meeting platforms.

- In 39.4, aggregate feedback shared with school boards should be shared with their SEACs.

Section five: Organizational barriers

Compliance with the *Accessibility for Ontarians with Disabilities Act, 2005*, the *Ontario Human Rights Code* and the *Canadian Charter of Rights and Freedoms* recommendations (40)

We support the direction of these recommendations with the following considerations:

- The provisions in 40.1 must in no way diminish the eligibility for special education processes and services that are currently available to students with special education needs, including students identified under Gifted.
- Broadening the definition of accommodations in 40.2 must take into account the important difference between accommodations and modifications.
- We strongly support the requirement that the Ministry of Education “ensure that school boards fulfil their duty to accommodate the disability-related needs of students with disabilities”. Accountability and reporting mechanisms which have evidence and data gathering must be put in place by the Ministry of Education.
- School board accountability mechanisms must include meaningful consultation with SEACs.

Inter-ministry collaboration: to ensure students with disabilities receive the support they need from other ministry-funded services at school recommendations (41)

We strongly support the need for Inter-ministerial collaboration. Recommendations need to include the following considerations:

- There need to be clear definitions on who is responsible for what, where the ultimate responsibility lies, and what is defined as health support and what is defined as education.
- To facilitate collaboration between the education sector and other ministries, including with parents, there needs to be clarity of language/terminology used in different ministries and roles and responsibilities of professionals.
- Education must be provided whether or not health, rehabilitation and mental health supports are in place, meeting health and safety requirements of students while providing necessary accommodations. Students should not be excluded from school because health, rehabilitation and mental health supports are not in place.
- Strong support for dispute resolution mechanisms at the student, school board and provincial level regarding access and delivery of student support services from provincial and community partners (41.10)

- Dispute resolution mechanisms should include the issues around timely access to health, rehabilitation & mental health supports.

Accountability recommendations (42)

We strongly support the accountability recommendations, with individual comments as follows.

- We strongly support recommendation 42.1 with the addition that accountability and reporting mechanisms which have evidence and data gathering must be put in place by the Ministry of Education.
- SEACs must be included in the oversight process and be given more responsibility on reporting and transparency.
- We strongly support recommendation 42.2 on an ombudsman.

Individual education plans recommendations (43 – 48)

We strongly support the recommendations on individual education plans with comments as follows.

- Specific recommendations should be made on the following items discussed under Barriers:
 - establishing a prompt, fair, independent and impartial process for parents /guardians of students with disabilities to go if they are not satisfied with the Individual Education Plan that a school board proposes, in order to get a review of the proposed Individual Education Plan.
 - establishing a prompt, fair, independent and impartial process which parents /guardians of students with disabilities can use, if they believe that the school board is not fully implementing a student's Individual Education Plan.
- We strongly support the recommendation for annual audits of IEP compliance (48), including reporting to SEAC and the public. The Ministry should review the audits and give feedback to school boards that is shared with SEACs.

Parent and student participation recommendations (49)

We strongly support the recommendations on parent and student participation, with individual comments as follows.

- There will need to be clarity on the difference between students with disabilities who have rights under the Ontario Human Rights Code and students entitled to special education services or students deemed to have special education needs who have rights under the Education Act and Regulations.
- We strongly support recommendations 49.1 and 49.2. The timely formal process/dispute resolution mechanism must be financially accessible to parents.

- Data should be gathered on these disputes in order to address systemic issues on IEPs.
- The formal process/dispute resolution process and data gathered should be reported in Special Education Plan.
- SEACs should be involved in the development of any resources for parent/guardians and students (49.4)
- We strongly support the requirement for school boards to provide written reasons for refusal of accommodation, service, or support. In addition information must be provided on the timely formal process/dispute resolution mechanism (49.11 f).
- Clarity is needed on two types of helpers/system navigators. Training on board policies and processes needs to be provided to existing system navigators through community agencies. In addition, there need to be trained 'mentors' available to families that don't qualify for existing system navigators through outside agencies. Information about both services needs to be available to the public (49.18).

Exclusions/refusals to admit to school/reduced school hours recommendations (50)

We strongly support the recommendations on exclusions/refusals to admit to school/reduced school hours with the following comments:

- The "rights of students with disabilities under the Ontario Human Rights Code, including their right to accommodation of their disability-related needs up to the point of undue hardship, take primacy over all other Ontario laws and policies" as stated in 50.4 should be pointed out at the beginning of these recommendations.
- There need to be clear definitions of what is included in 'exclusions/refusals to admit' and reduced school hours.
- School boards should collect data on instances of exclusions/refusals to admit and reduced school hours for students with disabilities. Aggregate, nonidentifying data should be shared with SEACs and made publicly available.

Data collection recommendations (51)

We strongly support the need for gathering and transparency of data related to students with disabilities, and supports the data collection recommendations with individual comments as follows.

- SEACs should have access to all data related to students with disabilities and special education (in aggregate, nonidentifying format).
- Collection & submission of data should coincide with dates for submission of ONSIS data.

School board accessibility committees and plans recommendations (52)

We support the recommendations of accessibility committees and plans, with the following provision:

- School board accessibility committees need to include representation from SEACs.

Professional learning recommendations (53)

We strongly support the recommendations on professional learning, with the following comments:

- It is very important that the Ministry work with district school boards and community organizations to collaborate on the development of joint professional learning resources to support students with disabilities at school, and that this includes working with non-educators such as occupational therapists, medical practitioners, and paraprofessionals and parent/guardians to ensure diverse perspectives and expertise. (53.3)
- In addition to the College of Teachers revising the guideline for accreditation of faculties of education to add more credits on teaching students with disabilities in the pre-service program (53.7), it is important that these be compulsory credits.
- All preservice teachers should be required to take courses on assistive technology.

SEACs need to be involved in designing the learning opportunities/resources outlined in 53.9 and 53.10.

Process for a school board identifying and making the placement of student with disabilities recommendations (54 – 56)

We support the direction of these recommendations with the following considerations:

- Because of the large ramifications of proposed changes the process needs to be undertaken with great care and clear guidelines.
- Any consideration of changes to the identification, placement and review committee process and regulation (54) must in no way diminish the eligibility for special education processes and services that are currently available to students with special education needs, including students identified under Gifted.
- Representation on the review panel (55) should include community organizations and PAAC on SEAC. School board representation should include SEACs.

Section six: Social realms

We support the recommendations on Social realms, with the following comments:

Transitions facilitator/navigator recommendations (58 & 59)

- The transitions facilitator/navigator role described in 58 is very important. It is unclear if the recommendation is for the school or school board level. It is also unclear how the recommendation in 58 aligns with the recommendations of the Transitions subcommittee to create a transition Facilitator/Navigator role (12).
- We support a transitions facilitator/navigator role at the school level, with support from the school board. The mandate of the transitions facilitator/navigator role should include supports to students for transitions within the school system as well as for transitions out of the school system.
- Information on transition supports needs to be available to parents.
- The creation of a centralized Transitions Hub is an effective practice.

Transportation recommendations (60 – 63)

- We strongly support individual consultation with each family to identify accessibility and accommodation needs of the student with disabilities in relation to transportation (61.1) and the designation and production of reachable official at the school board and the transportation, especially during the working hours when students are being transported, to receive and address phone calls, emails and text messages from a family about problems regarding the student's transportation (61.6).

Bullying/cyberbullying workshops recommendation (64)

- We recommend a comprehensive strategy to address stigmatization and ableism issues at all levels, with consultation from students, families, community agencies and SEACs.

Experiential / co-op learning opportunities recommendations (65 & 66)

- We strongly support the need for accessible experiential /co-op learning opportunities.
- Placement locations need to be pre-screened to ensure that they meet accessibility requirements and in particular the accessibility needs of the individual student planning to participate.
- Transportation to placements needs to be accessible and have supports in place as needed by the student.

Social isolation recommendation (67)

- Staff assistance for social interaction and play, particularly during unstructured or minimally supervised times, such as recess or lunch (67) should be provided only by staff trained to meet the individual IEP goals of the student, with input from parents.
- Education of peers is an important part of the planning.

Section seven: physical and architectural barriers

- When a consultation process is discussed regarding physical and architectural barriers, it should include experts from the field of accessibility planning, design and construction, such as accessCAN <https://www.access-can.ca/> or SPH Planning & Consulting <https://www.sphassociates.ca/sitemap.php>

Section eight: planning for emergencies and safety framework

We strongly support the need for planning for future disruptions to schooling.

Of particular importance are:

- various options to delivering education and health services (120. d). These need to be available to students based on individual student need, and in consultation with parents/guardians.
- measures to address the possible surge in demand and increase capacity to provide specialized disability supports (120.e), including enhanced staffing, for the return to in-class and distance learning (increase in in-class supports, social workers, psychologists, guidance counsellors).
- provision of digital resources and any communications during an emergency event is in a format that is accessible to students with disabilities and their parents (120. g)
- an interlinked, coordinated and inter-sectorial education approach in providing a seamless service delivery model to provide services and supports to students with disabilities (Psychology, Physical Therapy, Speech Therapy, Mental Health, etc.) during an emergency event (121. h).
- A Ministry list of acceptable accessible, cross platform virtual learning environments and synchronous teaching systems to be used by school boards to ensure remote access to education services during an emergency (136).
- Preparedness planning and review needs to involve SEACs.

Section nine: timelines and accountability

We strongly support the need for strong accountability measures for all the recommendations for K – 12 education. Specific comments follow:

- The compliance measures in 188 and 189, i.e. a public searchable database, and a widely publicized provincial toll-free number and dedicated email address to receive complaints and concerns from students with disabilities their families or others, are particularly important.
- SEACs should receive the nonidentifying summary of input/complaints received in relation to their school board.

- School board reports to the Ministry of Education on the results of their implementation actions and performance (194) should go to SEACs.
- Audits and reviews, with publicly available reports, are very important for compliance.
- Reviews by the Accessibility Directorate to ensure school boards have developed an implementation plan with performance metrics and designated responsibility centres and have started to move forward with the implementation of the Standards (195) should be followed by ongoing reviews to make sure boards are implementing their plans and continuing to work on accessibility.

Submission on the Initial Recommendations of the Education Technical Sub-Committee on Accessible Transitions

A group of provincial parent organization worked together on this submission, following the release for the public consultation, through their connections at PAAC on SEAC, and their common interest in the important role of SEAC. Representatives from the following organizations reviewed and supported this submission:

- Association for Bright Children of Ontario
- AFPED+ Association francophone pour parents d'enfants ayant un trouble d'apprentissage
- Easter Seals Ontario
- Learning Disabilities Association of Ontario
- FASD-ONE Education Action Group
- Down Syndrome Association of Ontario
- Hydrocephalus Canada
- Ontario Association for Families of Children with Communication Disorders

We strongly support the importance of transition planning and supports. There are many good recommendations in made by the Transitions sub-committee, with the following additional comments:

1. Transitions to and within K-12

- The transition plan component of the IEP is critical to supporting students throughout their school career and leaving secondary.
- Ministry of Education responsibilities should include ensuring that school boards collaborate with other ministries to make sure transitions are fully supported, and ensuring union contracts support transition planning and involvement as responsibilities of their members.
- De-streaming (9) issues for students with disabilities are complex, and often different than de-streaming concerns related to race or culture. Supports need to be in place early to allow options to be open. Please see Appendix: PAAC on SEAC submission on De-streaming issues for students with special education needs.
- Specific transition supports are needed from elementary to secondary education. These should include orientations for students and parents, coordination of IEPs including transition plans and of IPRCs, liaison between elementary and secondary educators, transition meetings involving educators and board staff at both levels as well as students and parents.

- School boards should create transition programs and processes that include Transition Facilitator/Navigator roles at both the board and school levels (12). This recommendation needs to be aligned with similar recommendations in Section 6 of the K - 12 Recommendations.
- Recommendations 21 - 27 on assessments do not address the issue of financial accessibility of updating assessments for postsecondary purposes. Options presented are not available to all families. Recommendation 41 suggests that the Ministry of Education should budget for students with disabilities in grade 11 or 12 to receive new or updated formal professional assessments. There should be a more specific recommendation on school board funding at the secondary level for such assessments.
- Recommendation 26 is inaccurate. Students do not require an IPRC to access accommodations at postsecondary, and parents should be informed that an IPRC identification is not sufficient to access accommodations at postsecondary (although sometimes can be used for interim accommodations pending full documentation).

2. Transitions from K-12 to postsecondary education

- Recommendation 32 should clarify that the Ministry of Education ensures that assistive technology training is provided *by school boards* to staff and students.
- Transition programs for incoming postsecondary students should be available at all colleges and universities (33).
- The list of areas to be included in such transition programs is thorough. The following two items should be included as stand alone items rather than under group work:
 - understanding how to manage synchronous/asynchronous course work
 - navigating learning management systems
- Documentation and funding barriers are very important areas to be addressed.

4. Transitions from secondary school to the workplace and community

- We were concerned about the lack of emphasis on transitions to the workplace and suggest that representatives from the employment sector should be consulted about important features of employment preparation.
- Employment preparation needs to include training in workplace safety, including requirements for workplace safety accreditation, and understanding of the right to refuse unsafe workplaces.
- More specific recommendations should be made about preparation for community involvement.
- Disability accommodations need to be available in Adult Education programs.

- Existing programs such as Community Integration through Co-operative Education need to be expanded to be available across Ontario so that students who need home supports have the opportunity to attend.

Appendix: PAAC on SEAC submission on De-streaming issues for Students with Special Education Needs

Issues and Comments

- Students in elementary grades often work toward modified curriculum expectations on their individual education plan. When this is started in early grades and continued through elementary school they will not have adequate academic preparation to do de-streamed courses in grade 9.
- Every attempt should be made throughout elementary grades to keep options open for all pathways in high school.
- Students in elementary grades may be working toward modified curriculum expectations when they could be working on grade level curriculum if they received adequate accommodations. For example, students with reading disabilities could make use of electronic versions of books or text-to-speech technologies to study grade level curriculum.
- Students in grade 9 will only be offered the option of a de-streamed course or a locally developed course. If parents or teachers decide that they are not likely to be successful in a de-streamed course, then a locally developed course may be seen as the only option.
- As an additional option to taking Learning Strategies 1 in the first semester or concurrently to a grade 9 de-streamed course, students should have the option to take a locally developed course to build their skills before taking the de-streamed course, e.g. in two consecutive semesters.
- It will be important to maintain and facilitate transitions from applied to academic levels beyond grade 9. Requirements to retake a course at academic level when a student has already earned a credit for the applied course at the same grade level is a barrier to changing pathways.

Questions

- Will students who have been working toward modified curriculum expectations in elementary grades be allowed modifications in de-streamed grade 9 courses and still receive credit? Currently students in high school are allowed only minor modifications to curriculum if they are to receive a credit.
- If students decide to take the grade 9 de-streamed course and are not successful, what options will be available to them?
- Will students who took applied math courses in 2020-21 have to take the mathematics transfer course this summer in order to have an option to transition to academic math in

Grade 10? What will happen after August 31st, 2021 if a student was not able to do the transfer course over the summer?

For Grade 9 math de-streaming specifically:

- Much attention will need to be made to building foundational math skills, and making sure they are understood, in elementary grades. There will need to be options for upgrading skills at all grades for students who are struggling.
- There will need to be opportunities at the beginning of the course to fill knowledge gaps that students may have from lack of appropriate math support in previous years.
- Teachers in de-streamed grade 9 math courses will need to have professional development on how to use universal design for learning (UDL) principles and how to differentiate instruction for students with different learning needs, in addition to having expertise in teaching math concepts.
- Support staff who work in de-streamed math classes should have professional development in math instruction, in addition to UDL and differentiated instruction.
- If there is no intention to lower class sizes for de-streamed math courses, a second teacher with math experience should co-teach, in order to provide extra support and differentiation.
- The curriculum should support skills needed for entering various pathways following secondary school (life, work, volunteer, academic, apprenticeship).
- Access to workplace math courses should be continued, with curriculum relevant to career and life paths.

Other issues:

- de-stigmatizing the need for extra support and differentiation
- improving educator understanding of brain differences in supporting learning
- changing educator bias favouring academic pathways, so that all pathways are considered

PAAC on SEAC strongly supports the guidelines that families should be treated as partners in their children's education and equipped with the skills and knowledge to actively participate in their children's choices and learning. *Engaging with grassroots community organizations should include parent organizations that support parents of students with special education needs.*

School boards should consult with their Special Education Advisory Committees (SEACs) in planning supports for students with special education needs in de-streamed classes, and use SEACs to help communicate with parents about these supports.

PAAC on SEAC strongly supports the need for wrap-around supports to address learning gaps before grade 9, including early math and reading intervention programs. This will be essential for successful de-streaming grade 9, in addition to wrap-around supports going into grade 9 (e.g. summer bridging programs) and during grade 9.

Memorandum to: Directors of Education
 Secretary/Treasurers of School Authorities
 Principals of Provincial and Demonstration Schools
 Chief Executive Officers and Executive Directors of
 Children's Treatment Centres
 Chief Executives of Home and Community Care Support
 Services, Ontario Health and the Children's Hospital of
 Eastern Ontario

From: Nancy Naylor
 Deputy Minister of Education

Dr. Catherine Zahn
 Deputy Minister of Health

Denise Cole
 Deputy Minister of Children, Community and Social
 Services

Subject: *Policy/Program Memorandum No. 81, Provision of
 Health Support Services in School Settings in 2021-22:
 New Expectations*

The ministries of Education (EDU), Children, Community and Social Services (MCCSS) and Health (MOH) are working together to support students that require health and rehabilitation services (speech and language therapy, occupational therapy and physiotherapy) to be successful in school. We are writing to inform you that we are undertaking a joint review of Policy/Program Memorandum No. 81 (PPM 81), *Provision of Health Support Services in School Settings in 2021-22*. Further details about consultations with key partners and how school boards/authorities, Children's Treatment Centres (CTCs) and Home and Community Care Support Services (the business name of the Local Health Integration Networks as of April 1, 2021), and other school health professional services delivery partners can contribute to the review will be forthcoming.

Some of the key objectives of the review are:

- Strengthening evidence-based practices;
- Improving access to health and rehabilitation services in schools; and
- Clarifying roles and responsibilities to address gaps in services.

The ministries will be in touch in the very near future to provide more details.

Pending the review, we are writing with some immediate updates to clarify the delivery of health and rehabilitation services in Ontario's publicly funded schools.

Streamlining Access to Rehabilitation Services

As of January 1, 2019, responsibility for the School-Based Rehabilitation Services (SBRS) program was transferred from the Local Health Integration Networks under the Ministry of Health to CTCs funded by MCCSS. This transfer allowed for school-based services to be better aligned and coordinated with community rehabilitation services – such as preschool and school-age services – and is a step toward more streamlined services for children and families. For greater clarity, rehabilitation services in publicly funded schools previously assigned to MOH (*as per memo sent August 31, 2018 - Transfer of Contracts for School-Based Rehabilitation Services from Local Health Integration Networks to Children's Treatment Centres*) under PPM 81 are the responsibility of MCCSS and their providers should continue to be welcomed into schools as laid out in the PPM.

Beginning January 2020 and in accordance with the terms of their transfer payment agreements with MCCSS, CTCs can adjust their service delivery models to offer services during summer and school breaks, and provide group and classroom interventions where appropriate, to best meet local needs. School boards are encouraged to work with CTC partners to implement changes to support the rehabilitation needs of students and their families.

Unified Speech and Language Services

School boards and children's rehabilitation service providers have identified the delineation between speech and language services as a service delivery challenge that is not aligned with best practices. The ministries understand that many local communities have already adopted a unified approach to providing speech and language pathology. The government is supportive of these local arrangements and encourages the community to adopt a unified approach when it will best serve students and reduce duplication.

In-School Delivery of Services

Although the public health situation resulting from COVID-19 continues to evolve, we remain committed to supporting students' access to the supports that they need to access learning. It continues to be the Ministry of Education's expectation that school boards work with their local partners to facilitate access to schools by service providers, including those providing school health professional services and CTCs and their delivery partners, as appropriate so that students learning in-person can receive access to support services. Remote delivery of services should only be considered for students learning in person as a last resort.

Please also note that school boards are expected to work with their local CTCs and with Home and Community Care Support Services, CHEO (providing pediatric home care services in the Champlain region) and other delivery partners to facilitate access to health and rehabilitation services for students enrolled in remote learning.

Thank you for your partnership as we work together to jointly support students who require these vital services.

Nancy Naylor
Deputy Minister
Ministry of Education
Children, Community and Social Services

Dr. Catherine Zahn
Deputy Minister
Ministry of Health

Denise Cole
Deputy Minister
Ministry of

Remote learning for students with special education needs:

Educator tip sheet

Universal design for remote learning and a tiered approach

Virtual learning, like classroom learning, should be inclusive and follow Universal Design for Learning. (UDL; Basham et al., 2020; Obiakor et al., 2010). UDL is based on the understanding that approaches to teaching, learning and assessment that respond to the particular needs of a student or groups of students can be useful for all. With UDL, teaching is tailored to draw on the strengths and meet the needs of all students (Learning for All, 2013).

The tiered approach “is based on frequent monitoring of student progress and the use of assessment data, focusing on

learning rate and level, to identify students who are facing challenges in learning and to plan specific assessment and instructional interventions of increasing intensity to address their needs effectively” (Learning for All, p. 24). Tier 1 can be described as good for all, Tier 2 as necessary for some, and Tier 3 as essential for few.

Tier 1 practices: Welcome, understand & partner

- Connect with students and families at the start of the course. Find out about their hopes and needs. Check if they have the supports and resources they need to access and navigate the virtual course. Let them know how and when staff can be contacted.
- Get to know your students, for example with a survey or an orientation meeting. Ask for information about access and inclusion, such as the assistive technologies that work best for the learner, their Internet access, and how they like to communicate.
- Virtual ice-breakers can help create community. Tools that allow for brainstorming or short videos can help build community and help students develop their technology skills.
- Digital 'check-ins' each day are used by many teachers when classes start. This could include asking students to share a special moment or event, a brief discussion of a current event, or taking the 'temperature' of the group using a poll
- Offer opportunities for students to learn more about one another and their teacher (e.g. create and post introduction videos that include name pronunciation and preferred pronouns, have a group of students share each week about a particular interest, experience or skill).
- Create learning spaces that reflect the community of learners (personalized avatars, images that reflect diversity, a range of student work displayed)
- Connect beyond the classroom for learning (e.g. bring in guest speakers from students' community, virtual field trips, connect with students in classrooms in other cities/provinces/countries, have students' family members contribute expertise or experience that relates to curricular expectations)

Tier 1 practices: Engagement, representation, structuring time and activities

Engagement

- Maximize opportunities for choice and autonomy for individual students and the class as a whole.
- Reflect student interests in instructional materials and assignment choices.
- Reflect linguistic and cultural diversity in options provided for instructional materials and assignments.
- Co-create and model guidelines for respectful virtual interactions and for online discussions. Have clear expectations and consequences for when guidelines are not followed.
- Discuss digital privacy as a class. Many school boards have existing guidelines for acceptable use of technology by staff & students that can be reviewed. Some students with special needs benefit from social stories.
- Establish communication guidelines for synchronous classes.
- Create leadership opportunities for students (e.g. create and share music playlists for breaks, act as discussion leaders, pose a 'why' question to spark a class inquiry, create class committees that organize weekly events, daily physical activity, etc.)
- Make some classroom activities collaborative, where success is dependent on student contributions through a range of roles.
- Offer opportunities for formal and informal learner-learner engagement (e.g. small group collaborative projects, time for chats).
- Invite feedback regularly.

Representation

- Pair text with oral and visual information (e.g. adding closed captioning and/or transcription, adding diagrams or models for orally presented information, add voice-overs to slides, add text and/or oral descriptions for images).
- Provide step-by-step instructions, ideally with a combination of video and text.
- Ensure assistive technologies are easily compatible with course offerings (e.g. Google Read & Write works well with Google sheets, slides & docs).
- Consider helpful sensory practices such as having the educator wear noise cancelling headphones with a microphone enabled, ensuring good lighting and camera placement, and spotlight the presenter for tools that have this option.
- Make sure web content is accessible (e.g. text descriptions or captions for images or video, captions, font and colour in documents).

Structuring time and activities

- Develop consistent class routines (e.g. start with a poll, move to large-group sharing, small group work, break).
- Develop and share consistent daily and weekly schedules for meetings, activities, and deadlines.
- Create clear and consistent tasks for each day/week/module with a checklist or other tracking structure. 'Chunk' tasks and assignments into smaller elements.
- Consider how/when outdoor activities can be encouraged or facilitated.
- Incorporate movement and/or relaxation exercises to start classes and/or during transition times. It can help to set a timer, or have students set a timer, to remind everyone to move in whatever way works for them.

Ideally, incorporate movement into the instruction and activity periods in ways that reflect the content and concepts being explored. Ensure that these options are inclusive for students (Guseynova & Manuilova, 2020).

- Create and share clear plans for student-teacher communication (e.g. medium, timeline).
- Consider participation alternatives/options (e.g. using chat function, submitting questions in advance, pre-recording oral presentations, answering poll

questions, generating ideas on a shared platform, think-pair-share or small group work with reporting by group) (Catalano, 2014).

- Provide detailed expectations and evaluation criteria for all assignments. Use exemplars where appropriate.
- Monitor individual & class progress closely and provide regular feedback (Rice & Carter, 2015; Ontario Ministry of Education, 2010).
- Provide feedback in multiple ways (audio, video, written) (Basham et al., 2015; Tobin, 2014).

Successful strategies at tiers 2 and 3

Each student will have unique strengths and needs and knowing your student is the best approach. Students may benefit from a range of practices that may or may not be associated with their particular exceptionality below. Many students without special education needs also benefit from these strategies.

A student's Individual Education Plan (IEP) may need to be adjusted for remote learning. The daily schedule that has been planned for the students' class may be a good fit for them, or it may need to be adapted and the IEP updated. Some students may benefit from having paper packages or lessons delivered so that activities or workbooks can be completed at home with the option of emailing photos of their completed work to their teachers.

Many school boards have developed ways of providing small group instruction, individual sessions with educational assistants, and/or therapeutic sessions with specialists virtually. For some students with special education needs and their families, regular support from educational assistants, particularly those with whom a student has a pre-existing relationship, is crucial to their program access.

Synchronous teaching strategies

Exceptionality category	Strategies
Behavioural	<ul style="list-style-type: none"> ● Explain the day's events or schedule before class begins. Where applicable, use the announcement feature in the Learning Management System or send an email (Ontario Teacher's Federation, n.d.). ● Provide students with consistent expectations, rules and routines (Ontario Teacher's Federation, n.d.). ● Affirm and reinforce desirable behaviours (Ontario Teacher's Federation, n.d.). ● Integrate peer collaboration and small group activities that support feelings of connection, belonging and affirm meaningful contributions. ● Provide alternative participation options that do not require students to turn on their camera. ● When behavioural supports such as token-systems or behavioural contracts are regularly used, coordinate and collaborate with at-home caregivers and learning support professionals to develop adapted versions for the remote learning context (Truchlicka et al., 1998). ● Plan for breaks and social time that allow peers to interact in unstructured, playful ways (Sullivan and Cousins, 2015)

	<ul style="list-style-type: none"> ● Integrate exercise, movement, relaxation and moments for mindfulness as part of regular synchronous remote learning schedule. ● Support engagement by integrating games from time to time ● Modify screen time as needed in collaboration with students and parents (Ontario Teacher's Federation, n.d.) ● Monitor attendance. Call parents or send a personal email or note to check in on students who are not attending.
Communicational	<ul style="list-style-type: none"> ● Remove all technical barriers so that pictures, signs and speech can be used. ● Use subtitles and simultaneous closed captioning (Canadian Hearing Society, 2015). ● Use gestures that support student learning and understanding. ● Model speech patterns and create opportunities for students to use these patterns during synchronous participation (University of New Brunswick, n.d.). ● Be patient when students are speaking; do not rush them (Do2Learn, n.d.). ● Focus on interactive communication and active listening (Autism Training and Technical Assistance Project, 2020). ● Integrate texts that appeal to learners ● Ensure students have ways to express wants and needs (Autism Training and Technical Assistance Project, 2020). ● Reinforce communication attempts when student is non-verbal or emerging verbal (Do2Learn, n.d.). ● Paraphrase what student has said or indicated. ● Speak clearly and with an audible tone (National Deaf Center, 2020).

	<ul style="list-style-type: none"> Encourage use of speech-language therapist when needed and allow them to participate in class with student(s) (Do2Learn, n.d.).
Intellectual	<ul style="list-style-type: none"> Provide instruction focused on social norms in digital spaces; model ways of interacting in the online environment (Lussier-Desrochers et al., 2017). Support technical skill development through modelling, 1:1 check-ins and small-group discussion (Parmigiani et al., 2020). Monitor and adjust pacing based on student feedback. Prioritise social interaction; create time for playful social time with peers in addition to regular recess breaks. When and as possible with at-home supervision, integrate high-interest, relevant at-home activities into instruction (e.g., baking, fixing, making with materials on hand). Gifted learners particularly benefit from: Development of virtual peer connections with students in other classes or schools based on shared interest Opportunities to spend time in higher grade classes Flexibility in pacing to allow for acceleration or compacting (Stargardter, 2021).
Physical	<ul style="list-style-type: none"> Invite and encourage use of assistive support professionals such as notetakers, sign-language interpreters where needed. Check navigability of videoconferencing platform; ask students/caregivers to identify what they need to participate fully; check in to find out what worked and didn't work. Use simultaneous transcription applications. Adjust screen time requirements in consultation with students and families.

Multiple	<ul style="list-style-type: none"> Consult with students, parents and learning support professionals to understand the student's interests, strengths and their needs in terms of digital skills, required assistive technologies, communication needs, and physical needs in a synchronous videoconferencing environment (Lombardi, 2019). Offer alternate methods of participation, communication, action and representation that align with the student's unique strengths and needs (Lombardi, 2019).
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Asynchronous teaching practices

Exceptionality category	Strategies that remove known sensemaking barriers
Behavioural	<ul style="list-style-type: none"> Be flexible with deadlines and responsive to students' social-emotional needs. Use recorded video instructions that enable students to revisit expectations (Anderson & Sorenson, 2017). Design alternative assignments for students who are struggling with the demands of remote learning. Use analytics in Learning Management Systems (LMS) to monitor participation. If students are not participating, check in quickly with a personal note or telephone call. Participation is a significant predictor of success in online learning (Bae Kwon, DeBruler & Kennedy, 2019).
Communicational	<ul style="list-style-type: none"> Provide incremental opportunities for success so students are able to tackle more complex tasks over time. When appropriate and needed, ensure that learning materials such as adapted books, math manipulatives, picture-word

	<p>cards, augmentative and alternative communications devices, and visual schedules are provided.</p> <ul style="list-style-type: none"> ● Integrate high-interest texts. ● Check that all learning materials are Perceivable, Operable, Understandable and Robust (POUR). ● Integrate approved resources for literacy and numeracy instruction (e.g., Empower Reading; NetMath; Calcularis). ● Encourage and where needed, teach use of assistive technologies such as speech-to-text, text-to-speech, translation applications, and text summarizers that can enable students to work independently (e.g., Read & Write, WordQ, Kurzweil 3000, DeepL, Google Translate, MS Interactive Reader, Quillbot, TextCompactor) (Pierson, 2021). ● Invite the use of Voice Recordings, Video Recordings for student assignments using built-in assistive applications such as Voice Notes or smart-phone cameras (Ontario Teachers' Federation, n.d.).
Intellectual	<ul style="list-style-type: none"> ● Send updates at a predictable time each week; don't overwhelm students with too many alerts or updates. ● Where possible, use settings in the Learning Management System to manage the release of updates to students. ● Anticipate and remove navigational barriers; reduce the number of clicks needed to find, reply, participate, submit. ● Use consistent, predictable structures in the presentation of tasks. ● Prioritize organization. Use checklists, to-do lists, visual schedules, visual cues such as icons that signal organizational structure or task type (Disability Issues Canada, n.d.). ● Encourage and teach use of assistive technologies that can reduce online distractions (e.g., focus mode) and provide multimodal access to ideas (e.g., text-to-speech) (see above).

	<ul style="list-style-type: none"> ● Provide access to additional resources that enable interested students to explore high-interest topics independently. ● Introduce digital platforms that support communication, expression through multiple modes, choice and autonomy (e.g., Flipgrid, Padlet). ● Gifted learners particularly benefit from: <ul style="list-style-type: none"> ● Pacing options (curriculum compacting, acceleration) ● Ensuring enrichment opportunities are pre-established on digital platforms. ● Using discussion boards for critical/creative thinking (Potts, 2019).
Physical	<ul style="list-style-type: none"> ● Provide access to printed materials in accessible format (screen readers, Braille, large print, magnification) (Ontario Teachers' Federation, n.d.). ● Offer enlarged print versions of assignments or different size text on platform (Ontario Teachers' Federation, n.d.). ● Ensure font size and type are legible (Ontario Teachers' Federation, n.d.). ● Use alternative text for all images. ● Work with assistive technology specialists, students and families to determine alignment between assignment expectations and the assistive technologies that students are using at home.
Multiple	<ul style="list-style-type: none"> ● Monitor participation. ● Communicate quickly and regularly with the student, parents and learning support professionals to build relationships, and networks of support around the student.

Remote learning for students with special education needs:

Parent tip sheet

Supporting your child

Help your child choose a place to work. For some students, this is a spot where a family member can be nearby; for others, a private area is better. Some students work well independently. Others need parents to take a more active role.

Support your child to manage their time. Help your child set up a calendar with specific due dates and reminders. You might want to add important dates and times to your calendar, too.

Set a timer to help your child work through assignments in smaller pieces or “chunks”.

Remind your child to take breaks to move around. Try to spend time outside during the day, if possible.

Have conversations with your child. If they become overwhelmed, try problem solving with them or reaching out to a teacher.

Give your child choice in when and where they complete their work, when possible.

Prioritize your child’s wellbeing. Contact your child’s school if you think they have a mental health concern or if they could use wellness supports.

Help your child communicate with their teacher. Sit with your child while they draft an e-mail to their teacher to ask for help.

Communicating with the School

Talk to your child's teachers about how you can communicate. Find something that works for everyone.

- How will you communicate? Will you use a virtual communication book, email or a phone check-in?
- When will you communicate? How long should it take each person to respond?
- Who will you communicate with? Is there one member of a student's school-based team who will take responsibility for remaining in regular contact?

Talk about your expectations and come to a shared understanding about what families and school staff are each going to provide.

Help educators understand your child

Families have unique insight into how remote learning is working for their child.

Let school staff know:

- how long your child can focus during synchronous learning

- what your child finds most engaging
- if your child feels like they can participate
- If they can understand the material
- if assignments being sent home are a good fit for the child or need to be adapted
- what is working well at home
- if tools from school (e.g. equipment, fidget toys) could help at home

Talk to your child's teacher about how their Individual Education Plan (IEP) might need to be updated to support remote learning.

Working with technology

Ask your child's school about help available for you and your child. Some schools offer video tutorials or helplines. This might help you if your child usually uses assistive technology at school and has brought it home for remote learning.

Talk to your child about cyber security and privacy. Some students with special education needs might need parents and teachers to teach safety rules using tools like social stories.

RECEIVED

OCT 20 2021

October 5, 2021

The Honorable Stephen Lecce
Minister of Education
Mowat Block 22nd Floor
900 Bay Street
Toronto ON, M7A 1L2

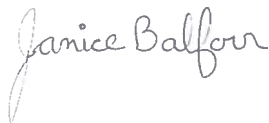
Dear Minister Lecce,

Re: Support for Bill 172 An Act in Relation to Fetal Alcohol Spectrum Disorder

Trillium Lakelands District School Board's Special Education Advisory Committee is in full support of Bill 172. This proposed legislation will require all boards of education throughout Ontario to develop policies and guidelines with respect to FASD and require the Ontario College of Teachers and ECE programs to provide training with respect to FASD.

The high prevalence of FASD in Ontario makes it imperative that we offer comprehensive services to those impacted. The Ontario government has supported communities by providing funding for FASD Workers, an online information portal, indigenous FASD/child nutrition programs, and family and caregiver support groups. This support needs to be expanded to ensure that our educators have the knowledge and skills they need to support children and youth impacted by FASD to reach their full potential.

Thank you for acknowledging our support for Bill 172.



Janice Balfour
Chair of SEAC, TLDSB

Cc: Norm Miller, MPP
Laurie Scott, MPP
SEAC Chairs