ONTARIO PUBLIC SCHOOL BOARDS' ASSOCATION

AND

ONTARIO CATHOLIC SCHOOL TRUSTEES' ASSOCIATION

JOINT RESPONSE TO

PROPOSED AODA STANDARD FOR ACCESSIBLE INFORMATION AND COMMUNICATIONS

The Ontario Public School Boards' Association and the Ontario Catholic School Trustees Association together represent 60 district school boards in Ontario and collectively provide services to close to two million students. Our Associations commend the Standards Development Committee responsible for the Proposed Accessible Information and Communication Standard for the scope and depth of their work. Clearly, implementation of all the measures proposed will result in comprehensive levels of accessibility for persons with disabilities and huge improvements in accessibility options for the Ontario population as a whole.

Under the proposed Standard, by December 31, 2011, school boards will have the obligation to:

- Inform persons with disabilities that there is accessible information and communication available;
- Charge no more for alternate accessible formats than the regular cost paid by other consumers;
- Ensure that individuals with disabilities are not disadvantaged in terms of the timeliness, quality and availability of communication, given or received;
- Establish a user request, feedback and complaints process that allows persons with disabilities (whether they are consumers or employees) to identify their comunication needs and to communicate with the organization;
- Provide emergency and public safety information required under existing law (e.g., evacuation procedures) to the public and employees in formats and communication methods that can be used and understood by persons with disabilities;
- Develop, implement and maintain policies, procedures and practices to comply with the standard for accessible information and communication and write a statement of commitment to accessibility;
- Ensure that employees, volunteers and others who are responsible for designing or providing and receiving information and communication on behalf of the organization receive accessibility training.

Capacity to meet these obligations involves some targeted planning, changes to systems and processes, and allocation of resources. Meeting the timelines contemplated by the standards is

highly connected to identifying and securing necessary financial resources and having commitments from other partners involved. With regard to the latter, for example, a school board's capacity to offer accessible educational texts is largely dependent on the steps taken by both the Ministry of Education and the publishers of educational texts. Some specific comments follow.

3.0 IT-based information and communication systems

Making the user interfaces of existing IT based systems accessible will be a substantial undertaking for the school board sector. In addition to the central board websites of the 72 publicly funded boards in the province, most, if not all, of the 5,000 schools within these school boards have their own websites. While in many cases there are standard features in the school websites across a given board, there is also a significant degree of individualization. Compliance with the proposed standard will involve ensuring that not just the central board website but all school websites are upgraded or modified with a level of functionality to ensure fully accessible user interface. In the absence of specific additional funding to make this happen by 2011, an alternative approach of phasing in the improvements over a longer timeframe may need to be considered. It should be noted as well that, even with availability of funding, there is no uniform use of technology and broadband connectivity across all school boards and schools and it will take time for all sites to achieve the same levels of compliance.

It needs to be said as well that school boards are funded entirely through the Ontario Ministry of Education and the funding stream for Information and Communications technology is far from robust. School boards are already experiencing challenges with inadequate funding to replace obsolescent administrative and instructional systems and to bring classrooms up to a standard compatible with teaching and learning needs of the 21st century. Ideally, funding would be forthcoming for upgrading in technology in general with the implementation plan incorporating accessibility needs. At this time, this is not yet the case.

4.0 Business Enterprise Systems

OPSBA appreciates the consideration of an additional two years to both plan for the acquisition of new systems that meet accessibility standards and to modify the functionality of existing systems. In the case of school boards, the main enterprise systems would be:

- Student information system (SIS)
- Financial information system (FIS)
- Human resources information system (HRIS)

In addition there are many subsystems that staff use in departments and schools such as maintenance tracking systems, school success planning software, facilities rental system. The new AODA standards would require that these systems all be upgraded. In certain situations the vendors that provide these systems are common to many school boards. For example, student information systems in many school boards are provided by Trillium, financial information systems in many school boards are provided by SRB. This is important because the cost of

redeveloping or upgrading a system will be shared over the various school boards using that specific system. It would be difficult to do a quick estimate of what this may all cost but it is a reasonable assumption that the cost across the province would be in the hundreds of millions of dollars. In costings made available to the Information and Communications Standards Development Committee, the cost for one mid-size community college was upwards of $6 million. The school board sector has 72 school boards with over 2 million students in 5,000 sites.

The positive impetus inherent in the timeframes in the proposed Standard is that the timelines are the same for every school board and will promote the move to more common software and systems. However, given the current range of systems now in place in school boards across the province there is a number of factors to be considered including: the capacity of existing business enterprise systems to be sufficiently upgraded to comply with accessibility standards; the scope for streamlining the infrastructure currently in place; analysis of the cost-benefit implications of modifying existing business systems as opposed to acquiring new ones; clarity around the allocation of funding to change/acquire systems within the timelines proposed under the Information and Communication Standard. It needs to be emphasized that support on the part of the Ministry of Education, as the funding body of school boards, is critical to successful and timely change in this area.

5.0 Accessible formats and methods

From a resources allocation perspective, particularly with regard to funding, the full range of alternative formats and methods for responding to the needs of parents and the broader public would have to be built up over time. While schools and school boards have a depth of experience in providing services for students across the full spectrum of disabilities, the requirements in the Draft Standard are, as indeed they need to be, much broader in scope and design, serving as they do the broader public.

Public meetings of a school board, parent-teacher interviews, school performances, and sports events are just some of the events that involve parents, guardians, extended family and the broader public. Making the information and communication aspects of such events equally and fully accessible for persons with disabilities, as they are for persons without disabilities, will, in some instances, involve interpretation in alternate formats including sign language interpretation. This is an area where capacity needs to be built and may have an impact on proposed timelines for compliance. To take the example of sign language interpretation, consideration will need to be given to the availability of this resource in relation to the potential need. It is our view that there will need to be a substantial increase in the number of sign language interpreters. It should be noted as well that, in the school board sector, it is not unusual for the events mentioned above, such as parent-teacher interviews, to occur across the province on the same day.

6.0 Requirements for Educational Organizations and Regulatory Bodies

The proposed requirements in this section call for a significant level of change in practice and policy, as well as a need for coherent approaches to the changes among the Ministry of

Education, school boards, libraries and the educational publishing sector. The Standard will require boards to order resources for classrooms and libraries from publishers so that accessible electronic versions are available at the same time as textbooks and multi-media materials and that one version is not at a higher cost than the other.

Since the Ontario Ministry of Education, for example, establishes curriculum policy for Kindergarten through Grade 12 and is responsible for a list of approved resources for use in schools, as a first step it will be vital that they are ready to implement the requirements within the timeframe proposed in the Draft Standard so that school boards are in a position to choose resources that result in compliance with the standard.

The educational publishing sector which develops text-based materials that conform with Ontario curriculum will also need to be ready to meet the requirements of the Draft Standard to enable school boards to be compliant. An obvious pressure is the fact that the timeline for compliance for the public sector (school boards) is December 31, 2011 and the timeline for compliance for the private sector (education publishers) is December 31, 2012. Additional factors that have an impact on compliance are the capacity of publishers in a shrinking market to comply with the "no extra cost" requirement and concerns about safeguarding copyright/intellectual property in an electronic environment.

School libraries will be required to ensure that all new acquisitions are in accessible electronic format and that existing materials be made available in accessible formats upon request. Aside from having the funding to comply, there will be difficulties in providing materials in alternative accessible formats where there is no capacity to do so; examples include comics and trade magazines. With regard to new acquisitions, another consideration for school boards will be how to handle additions to holdings that currently come through parent fundraising or donations. Will school boards have to ask third parties to offer electronic versions?

There is a requirement for organizations that provide education on the design, production, and/or delivery of information and communication products (such as software applications, web applications and sites, computer hardware, marketing and public relations content to provide training in: information and communication barriers and requirements of persons with disabilities; inclusive design principles, resources and tools, and; testing of information and communication products to ensure they meet the accessibility needs of persons with disabilities. While this requirement may be seen as having primary applicability to the college/university sector, it also has an impact on courses taught in senior elementary and secondary schools. Compliance will require revisions to Ontario curriculum at the Ministry of Education level and will also have implications for teacher training both at the Faculty of Education level and in school board professional development.

We see a great deal of work needed to develop policies, in collaboration with school boards, around accessible educational resources so that school boards can meet the needs of all users in an equitable way. A further and very necessary aspect of readiness will be professional development for teachers on the range of accessible educational resources and their optimum use.

We would suggest that there has not been enough input from the Ministry of Education regarding readiness to comply and assessment of the funding required to achieve compliance. We further suggest that there has been insufficient dialogue with education publishers who will play a key role in supporting compliance by school boards. We would recommend that during the post-public review period, a roundtable be convened involving Ministry staff from Education Finance and Curriculum branches, representatives of the publishers of educational resources and, in support of teacher readiness, representatives of the Ministry of Training, Colleges and Universities. This would facilitate articulation of provisions and timelines that are achievable. Without confirmation from these parties that the provisions and timelines are achievable, school boards will not be in a position to comply.

7.0 Municipal Candidates in Municipal Elections

The proposed Standard makes no distinction between persons running for the office of school trustee and those running within the auspices of a political party for provincial office. School trustees represent local communities on matters related to implementation of educational policy and the governance and operation of school boards. Until recently, this was a quasi-volunteer position attracting an honorarium of $5,000 a year. (In smaller school boards in the province, the honorarium remains close to this amount and the largest boards are permitted to offer honoraria in the neighbourhood of $20,000.)

Those running for the office of school board trustee hold full-time jobs in their local community or are raising families without remuneration. Trustees are individuals not organizations and it is arguable that they should not be a part of the standard. The costs of running for office are self-funded and any campaign support that candidates may receive is ad hoc, voluntary and rare. Trustees have no access to the resources that tend to be available to candidates running for election to the office of MPP as members of a particular political party that receives campaign donations nor can trustees give tax receipts for donations. The proposed standard would require school trustees to provide their election materials in alternate formats and ensure that public meetings related to elections provide persons with disabilities the opportunity to participate in such meetings and pose and receive answers to questions through the use of relevant formats and processes. Trustee candidates across Ontario may not have equal access to services that would allow them to comply with these requirements, especially in view of the fact that candidates would all potentially be seeking the same services during the same relatively brief election period.

OPSBA completely supports measures that will ensure that persons with disabilities have the opportunity to participate fully in the electoral process. If municipal candidates are to be subject to this Standard, we urge the establishment of an appropriately funded resource within the Ministry of Municipal Affairs and Housing that will provide candidates running for municipal office full support in offering election/candidate materials and running candidates' meetings in formats that are fully accessible to persons with disabilities.   School board trustees have no access to any other source of funding for this purpose.

Summary

As noted throughout, the Ontario Public School Boards' Association supports the directions of the proposed Standard on Accessible Information and Communications. It must be said, however, that there is an obvious link between meeting compliance deadlines and the resources available to organizations to put in place the necessary changes that represent compliance.

It is not in the best interests of Ontario society as a whole to delay deadlines that will bring about changes ensuring dignity, independence, integration and equal opportunity for persons with disabilities in matters of access to information and communications.

If we are to meet the compliance deadlines, the government of Ontario and its ministries need to provide expertise and financial resources to support organizations in building the capacity required to be compliant. As was noted earlier, school boards are funded entirely by the Ministry of Education and rely on the Ministry to fund changes of this magnitude. Absent this kind of support, we believe that compliance procedures will need to (a) incorporate the concept of more graduated progress towards meeting the standards and (b) provide supports for organizations that are experiencing difficulties with full implementation. Our preferred approach is a proactive, holistic, fully-funded implementation strategy on the part of the government that has pioneered this ground-breaking legislation.

Respectfully submitted by

Ontario Catholic School Trustees Association
Ontario Public School Boards' Association

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