

### Report on Coordinated Accessibility Strategy Feedback Consultation Meetings, Feedback Sessions, Online Feedback

#### Date: September 5, 2019

### Overview

The following report is a summary of the feedback received related to the Coordinated Accessibility Strategy throughout the listening phase of the consultation work plan.

#### **Consultation Meetings**

Throughout the listening phase of the consultation process, Boris Vukovic (Director, READ Initiative) and/or Adrian Chan (Professor and Director of READ Initiative) met with key stakeholder groups on campus. Consultation meetings occurred with:

- CUASA
- CUPE 910
- CUPE 2424

- CUPE 4600
- PSAC 77000
- Individual consultation meetings

#### **Feedback Sessions**

A total of 3 feedback sessions took place for members of the Carleton community, which were open to students, faculty and staff and facilitated by the Office of Quality Initiatives.

#### **Online Feedback**

At the end of this report, the online feedback is presented as it was submitted. However, please note that any information that was deemed to be identifying in nature was redacted.



### **Broad Themes**

Throughout the listening phase of the consultation process, we sought feedback in seven broad themes:

- Coordination and leadership
- o Education and training
- Information and communication
- o Physical campus
- Employment and employee support
- Student support services
- o Research and development

This report has been organized by these themes and has the aggregated feedback of the listening phase. The submitted feedback received online is also included at the end of the report. This feedback has been examined and assessed in the creation of the Coordinated Accessibility Strategy.



# **Coordination and Leadership**

This theme refers to the need to better coordinate the various accessibility initiatives at Carleton. Strategic and coordinated activities can enhance effectiveness and impact of efforts to promote accessibility. An accessibility lens should be given to many activities, including building, renovations, research, pedagogical development, student services, and information technology. Policies, guidelines, and best practices related to accessibility need to be shared and well communicated. Increased awareness and promotion of accessibility should be done both within Carleton and beyond. The goals of the Coordinated Accessibility Strategy should be supported and sustained long term.

The following feedback was received regarding the Coordination and Leadership theme:

- Nothing about us without us
- People with lived experience need to have a voice, other voices can't overshadow this
- The current draft could be improved by bringing perspectives of people who are impacted by inequality and exclusion to the table for more effective policy-making
- Don't rely solely on persons with disabilities for these discussions. There can be some equity burnout. Don't just go ask the persons' with disabilities; don't just ask the leader with a disability to be the champion. The community as a whole has a role to play
- Important to include persons with disabilities as expert knowers and makers of access and accessibility
- We aren't hearing the stories from persons with disabilities
- Establish a Centre of Excellence in Accessibility
  - Advocate strategies for hiring faculty members with disabilities
- There should be an office/unit charged with leading this
- Having accessibility consultants could help connect experts with different people on campus seeking support and guidance around accessibility
- Attitudinal barriers and culture around persons with disabilities/accessibility needs to be addressed
- · Coordination needs to happen at the highest levels of the university
- Ensure accessibility is considered at a high level when making campus wide decisions. For example, when removing plastic straws for sustainability, there is an impact on accessibility that must be considered
- Conduct accessibility audits in all areas of campus (communications, digital, physical, etc.) to identify gaps and areas of improvement
- There needs to be increased focus on making all environments more accessible, instead of relying on individuals to identify a need for accommodation
- Changing attitudes/educating have a disability awareness week
- By heading towards a more formal and systematic approach to accommodation, we may be inadvertently reducing the ability for persons with disabilities to access support ad hoc/informally. Important to consider what people are already accessing at the university to ensure that the Strategy isn't reducing access



- Accessibility champions (help individuals navigate, advocate for gaps, provide information to others, etc.)
- Accessible procurement work being done in this area by the Accessible Procurement working group
- AVPs, directors, managers, etc. have to be on board. If the individuals at the top are on board, this will trickle down. If the people in these positions aren't modeling appropriately, there will be resistance
- Accessibility needs to be championed by administration at the highest level. Championship can't just slide onto employees, it needs to be done at the highest levels.
- Understand the scope of accessibility initiatives already in existence at Carleton
- To be a recognized leader globally and locally
- To have leaders who are champions for disabled people
- To adopt philosophy of UDL at highest level
- Central coordinating office, so increased awareness and amplification of effort
- Elevate importance
- Sustain and grow accessibility culture on campus
- Sustain momentum
- Coordinate connectedness among various initiatives
- Realize Coordinated Accessibility Strategy outcomes
- Conduct a thorough environmental scan of all accessibility initiatives in existence at Carleton
- Create a living document of all accessibility initiatives at Carleton to be maintained by someone
- Suite of training/workshops for Carleton staff, faculty and students
- Well organized website
- "Make" accessibility part of screening of new software tools
- Chief Accessibility Officer senior leadership where it is their central responsibility
- Establish university wide accessibility office (eg. READ)
- Conduct a review of ALL university policies to ensure inclusivity
- Have disabled people in key positions of leadership
- Vice-President accessibility
- Dedicated resources/hub
- Central point of contact
- We don't have a shared language to speak about disability, which creates barriers. People become uncomfortable about what they can and can't say
- Carleton takes an overly narrow view of the Ontario Human Rights Commission policy on accommodation.
- Have minimum standards for accessibility
- More events highlighting disability studies and the value of disabled culture
- The "duty to accommodate" under the OHR Code is not limited to basic classroom or test accommodations but also includes "both procedural and substantive obligations" but also includes (among other things) "design[ing] and develop[ing] new or revised facilities, services, policies, processes, courses, programs or curricula inclusively, with the needs of students with disability in mind". The OHR policy also states that "organizational policies, procedures and



practices must satisfy both of these components". Also, "factors such as business or institutional inconvenience, student or instructor morale, third-party preferences, and collective agreements are not valid considerations in assessing whether an accommodation would cause undue hardship."

- Misconceptions on campus about the prevalence of students with invisible disabilities
- Accessibility is always evolving as it is defined by individuals and their needs
- Coordinated Accessibility Strategy needs to outline the need for accessibility to be defined and understood at the unit level within each context. The Strategy should be a starting point for discussions and continued contextualization within particular units
- University administration must be willing to allocate sufficient financial resources towards accessibility and following through on this initiative. Love the idea, but nothing will ever progress without the financial commitment.
- There is a circular argument where people say they can't accommodate because there aren't enough financial resources, but then no financial resources ever get allocated
- Need to separate the reality of accessibility from political positions. Need to carve out accessibility from the politics of the topic, or we'll just spin our wheels on this topic.
- Health and safety used to be part of this process, but perhaps they were disempowered at some point? Lost attention or funding? Could we rejuvenate some of these original gatekeepers?
- Coordinated Accessibility Strategy should be asking to tap into strategic initiatives fund.
- Have a coordinator join the joint health and safety committee to hear issues around accessibility. This person would need to have enough power and resources to leverage to get things fixed quickly. If this role isn't going to be created, then it needs to be someone of significance within the university who can take responsibility for this.
- Perhaps data from safety's injury reporting form could help to inform accessibility related decisions. Also could help to provide support to people who have a temporary disability?
- A barrier is a lack of information, coordination, and accountability among departments and services
- A barrier is inadequate funding and investment in accessible structures and services, compared to strategic investment in other funding priorities such as new buildings and infrastructure.
- The current draft could be improved by prioritizing funding for accessibility issues and services.



The Coordinated Accessibility Strategy proposes the following objectives and recommendations in the Coordination and Leadership theme:

### **Objectives:**

- 1. Accessibility as a priority at all levels of leadership, with a commitment to continuous improvement.
- 2. Dedicated University resources for coordination, leadership, and expertise in accessibility.
- 3. Increased awareness and internalized culture of accessibility among the entire Carleton community, where accessibility is a consideration in everything we do.
- 4. Recognition as a leader in accessibility internally by faculty, staff, and students, as well as the external community.

- A. Conduct a thorough environmental scan and create a living document of all accessibility initiatives at Carleton.
- B. Establish an interdisciplinary centre of excellence in accessibility that provides leadership, coordination, best practices, research, support, training, and knowledge mobilization.
- C. Formalize the senior leadership responsibility for accessibility across the university portfolios.
- D. Increase depth of accessibility training of people in leadership positions.
- E. Expand university-wide and community events and campaigns to increase awareness and foster a culture of accessibility.
- F. Develop membership and contributions to accessibility partnerships, organizations, and consortium, partnering at the local, provincial, national, and global level.
- G. Establish a central resource to disseminate and receive information on accessibility.



# **Education and Training**

This theme refers to best practices in accessibility for teaching and learning (e.g., Universal Design for Learning) as well as developing relevant policies, knowledge, skills, and attitudes within Carleton's academic programs.

The theme also refers to skills-focused certification training programs (e.g., Rick Hansen Foundation Accessibility Certification Professional, International Association of Accessibility Professionals Certification).

The following feedback was received regarding the Education and Training theme:

- Provide classroom sound systems with the capacity for 2-3 mics to be plugged in at once to support accessibility in classrooms with experiential learning components
- Universal design for learning. Supports and resources to help instructors create more accessible learning environments
- What supports/accommodations are in place for persons with disabilities participating in academic practicums?
- Need for faculty that are trained and supported to deliver accessible content
- Need additional training for managers, staff and faculty beyond the modules provided by the province. Lack of practical resources to enable AODA compliance and enhance accessibility on campus
- Need contextualized training for Carleton, instead of the more generic AODA training
  - Fear that AODA training currently gives a false sense of knowledge around accessibility and does not encourage adaptation to address individual needs.
- More information readily available to staff and faculty about how to make their content more accessible, for example, toolkit that provides accessible templates, checklist and instructions to produce accessible materials
- Integrate more of a critical disabilities studies lens into other faculties (ex. architecture, policy)
- Any person who supervises another person (staff, chairs, instructors, TAs, etc.) should be receiving training on accessibility
- More in depth online training and in person training to connect people with experts in the field
- Student-teacher evaluations are made public at other schools, perhaps they should also be public at Carleton to increase a sense of accountability
- Student-teacher evaluations do not account for lab instructors, should be a mechanism to give feedback
- Students who most need help and wish to provide feedback are denied the ability to do so because the teacher evaluation surveys are only e-mailed to students in the final week of the semester. If you happen to be a student who had to drop-out earlier in the semester, you have no voice in the feedback collected.
- Onboard employees with accessibility
- Use UDL principles to guide course design



- Encourage an inclusive academic culture by contributing to standards for inclusive teaching and learning
- Create environments where all students are presumed competent
- Increase number of students on campus
- Build expertise
- Make accessibility an integral part of teaching and learning services
- Increase academic programs in accessibility and disability studies
- Minor in disability studies
- Workshops/certificate in accessibility
- Public standards for faculty
- Include accessibility education in all academic programs
- Offer training for professional certification-
- Create resources and best practices for inclusive classroom (with campaign around what it is and isn't) maybe training certificate
- Review recruitment practices
- Create/establish professional training certification for accessibility consultants (like RICP). Create certification for campuses.
- Encourage an inclusive academic culture
- Contribute to respectable standards for inclusive teaching and learning
- All students will have equitable opportunity to be included in learning environment
- Demystify and destigmatize disability
- Disabled students' experience to inform design
- Increase CU's thought leaders HIP in accessibility and inclusion
- Share list of best practices for inclusive classrooms
- Create a campaign(s) around what inclusivity means at CU
- Develop programming for professors and staff to provide them with resources
- Develop "incentive" system (certification?) to encourage participation in training
- Establish a training center for inclusion/accessibility
- Create a government approved certificate for accessibility consultants (similar to the regulated immigration consultant program)
- Empower the "lived experience" to inform and co-design programming and services
- It should be mandatory for all educators to attend periodic seminars to familiarize themselves with their obligations to accessibility and how to teach inclusively
- Effort needs to be made to improve teaching at the institutional level. Students should be able to expect that Carleton is making sincere and serious effort to provide quality and inclusive education
- Professors/instructors should indicate a time range in which students should be able to complete their various assignments.
- It seems fairly clear that the so-called 4-year "normal" timeline to graduate is in fact nothing more than a lofty goal and suggests that course-loads are too heavy for most students. University should be assessing to ensure the workload on students is not unrealistic



- It's not healthy for students to be given so much work without adequate tools, resources, supports, or consistent quality teaching that allows them to effectively manage it.
   Overworked students are isolated and depressed because their lifestyle is toxic and very unbalanced
- Consider the role of well-being when creating inclusive learning environments. How do we
  proactively create conditions for well-being in learning environments as part of designing
  inclusive spaces? Consider the work being done at Simon Fraser University:
  https://www.sfu.ca/content/dam/sfu/healthycampuscommunity/WLE-Tools/WLE-Printouts\_v5.pdf
- AODA was not done well. As long as this is the style of approach being used, we're going to go nowhere.
- A barrier is a lack of awareness on accessibility/inaccessibility issues within existing programs and courses
- A barrier is a lack of accessible conditions for disabled researchers and students
- The current draft could be improved by Integrating a Disability Studies perspective into existing courses and programs
- The current draft could be improved by making provisions to hire disabled faculty members

The Coordinated Accessibility Strategy proposes the following objectives and recommendations in the Education and Training theme:

### **Objectives:**

- 1. Greater awareness and understanding of accessibility and disabilities, and increased capacity to respond to accessibility needs.
- 2. Accessible teaching and learning environments with relevant supports and resources.
- 3. Comprehensive academic, educational and professional development programming in accessibility.
- 4. Academic culture that supports accessibility.

- A. Increase the number of in-depth training opportunities in accessibility on campus that are relevant to different settings.
- B. Increase the number of community activities that build greater awareness and understanding of accessibility and disabilities.
- C. Provide educators on campus with skills and resources to consider accessibility in the design of courses, such as using the Universal Design for Learning guidelines.
- D. Include persons with disabilities and their lived experience as a resource in the design of teaching and learning.
- E. Expand interdisciplinary academic programming and professional development in accessibility for members of the internal and external community.
- F. Address issues of disabilities and accessibility within the Faculties and Departments and encourage faculty to utilize relevant teaching and learning services.



# Information and Communication

This theme refers to the accessibility of all information and communication content and technologies at Carleton, including websites, documents, and events.

The following feedback was received regarding the Information and Communication theme:

- Accessibility of course materials (such as textbooks, journal articles, course packs, videos, podcasts, print content, etc.) should be considered. Scanned documents and course packs are particularly problematic
- Communications are not always AODA compliant
- Various campus systems are not fully accessible (cuLearn, Banner, etc.)
- All Carleton websites should be accessible
- Need more assistive technologies for students, such as FM systems
- Ensure accessibility in all knowledge creation and sharing (each faculty/staff/student creates documents, presentation, websites, etc.)
- All information systems, including website compliant with standards
- Fully compliant with AODA by 2025
- Redo AODA Training
- Workshop top 10 things
- Single website
- Best practices (documents, presentations, conferences, meetings, etc.)
- Perform system audits (driven by individual units)
- Need our web experts to be trained in accessibility, so this information can be disseminated
- Need improved communication when there are changes in physical space that will impact mobility on campus. Perhaps a mobile push alert.
- Based on AODA we are supposed to be identifying who people should be calling when they have issues. This should be simple.
- Information and communication must be made simple, perhaps centralized.
- Need to consider not just information and communication from an information technology perceptive, but also an information management flow. How is information being disseminated?



The Coordinated Accessibility Strategy proposes the following objectives and recommendations in the Information and Communication theme:

### **Objectives:**

- 1. Compliance that exceeds accessibility standards for all University information and communications systems.
- 2. Accessibility and accommodation resources for information and communications needs on campus that are built-in or readily available.
- 3. Increased knowledge, skills, and attitudes in all Carleton faculty and staff in accessibility in information and communications technologies.

- A. Perform system audits for accessibility, driven by individual units.
- B. Establish process for support for providing accommodations, and adaptive and assistive devices for Carleton events.
- C. Establish a reporting protocol to identify information and communication related accessibility barriers and areas for improvement.
- D. Establish best practices for accessibility in all knowledge creation and sharing (e.g., documents, presentation, websites, conferences), which are shared internally and externally.
- E. Provide information and training opportunities on accessibility in knowledge creation and sharing for faculty and staff.
- F. Ensure accessibility to be part of the procurement requirements.



# **Physical Campus**

This theme refers to the reduction and elimination of physical barriers at Carleton University, consideration of accessibility in future development of spaces and buildings on campus, as well as accessible signage and wayfinding.

The following feedback was received regarding the Physical Campus theme:

- Built environments are not fully accessible (e.g. automatic door openers, inaccessible bathrooms, very loud hand dryers, elevator doors should sense someone, high taps and deep sinks in washrooms, not every floor having an accessible washroom, automatic door buttons located too high/too small, cement floors are waxed so they are slippery, etc.)
- Accessibility supports frequently broken on campus (e.g. elevators out of service, automatic door openers not working, there is a railing for steps that go down from the Tory building to the tunnels where the top of the railing has been damaged and is jagged metal, etc). Can take time to fix, creating barriers
- Not all tunnels are accessible (e.g. tunnels do not include tactile signposts for students with visual impairments; much longer time needed to get around the tunnels, etc.)
- When service is down, there should be a number to call emergency services.
- Provide plastic straws upon request
- There should be brail on campus

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- Infrastructure needs to be maintained as well as our ideas are.
- We should be taking care of everything that AODA requires us to without exception
- Desire to go beyond the minimum building code requirements. Award winning buildings for accessibility.
  - Closing staircases and ramps in the winter removes accessible options
    - All stairs and sidewalks should be cleared and maintained so people can go outside if they would like to.
    - $\circ$  Stop blocking off the quad and exterior staircases in the winter.
- Wayfinding on campus can be improved (eg. tunnel names, clearly marked accessible pathways, etc.)
  - New 'Under Carleton' tunnel maps have received positive comments for wayfinding
- Brighter outdoor lighting and sidewalk and curb re-painting for visibility in low lighting
- Conduct an accessibility audit of building infrastructure with a focus on barrier free design
- Should be a considering existing documentation in the accessibility audit. For example, minutes from Joint Health and Safety Committee has lots of examples of issues. Focus on fixing things that have been identified issues for years. Minutes should be reviewed.
- Can't just leave it at the audit, need to have processes in place for what happens next
- Repair cracks and tripping hazards
- High traffic areas in the tunnels become congested by students campaigning/tabling, which decreases accessibility
- Not enough special permit parking available in central campus locations for individuals with mobility issues. Spaces have been removed due to construction or repurposing



- More effort to remove snow banks in the winter time, particularly around Unicentre which is a hub
  of activity for disabled parking
- More ticketing/patrol around special permit parking spots to deter misuse
- Create a designated, clearly marked commercial loading zone to avoid blockage of special permit parking near unicentre.
- Complete audit of the campus or campus survey
- Dedicated accessibility budget (base)
- Retrofitting is currently coming from maintenance budget, which people have been told there isn't enough resources to fix things. Recommended to make accessible retrofits come from capital funding or strategic funding.
- Retrofits on campus need to be done ASAP. To not have door buttons in 2019 is not accessible.
- Multiyear implementation plan
- When buildings are built, certification
- Spaces for people to congregate
- Better classrooms
- Create a CU Standard that goes above minimum requirements
- Create a more accessible campus
- Fully compliant with AODA by 2025
- Hire qualified consultant to develop a report
- Put request in for 19/20 budget
- Develop an approved, public, multiyear plan to include interior and exterior space based on a prioritized list of projects
- Make buildings/washrooms accessible
- Aim for certain standards and recognitions (eg. RHF Gold)
- Complete an assessment informed by users and create action plan with public results
- Create ways for campus community members to provide feedback on barriers they face and suggestions for change
- Prioritize making classrooms more accessible for faculty and students
- Improve bus stops on campus as currently 100's of people wait at the same stop for many different buses making it very difficult to catch a bus
- Go beyond the code
- Reduce/eliminate barriers on campus
- Do better than the minimum required
- Improve campus navigation
- Complete a campus assessment informed by CU community. Includes a plan to address issues results are made public
- Create a Carleton code of physical accessibility (eg. accessible doors with the bar not the button)
- Accessible signage that clearly indicates what IS and what IS NOT accessible (e.g. in tunnels, the non-accessible entrances to Mackenzie are marked at the main tunnel level)
- Need more communication around how to report near misses (CU Work Safe)
  - Need to ensure the reporting mechanism is accessible
- Better access to sports game



The Coordinated Accessibility Strategy proposes the following objectives and recommendations in the Physical Campus theme:

### **Objectives:**

- 1. Standards for accessibility of the physical campus that go beyond the minimum requirements.
- 2. Continual commitment to the elimination of existing physical barriers at Carleton University.
- 3. University policies and practices regarding the use of space, which supports the accessibility of the physical campus.

- A. Create a Carleton University standard for accessibility of physical spaces based on best practice guidelines and certifications that surpass minimum requirements.
- B. Perform a full accessibility audit of the physical campus with input from the campus community, particularly persons with disabilities.
- C. Undertake systematic retrofitting to address current problems and meet the new standards for the physical campus.
- D. Establish a reporting protocol to identify physical accessibility barriers and areas for improvement.
- E. Establish a permanent University budget and related supporting resources for accessibility of physical spaces.
- F. Review University policies and practices to consider accessibility where relevant to the physical campus.



# Employment and Employee Support

This theme refers to inclusive hiring of persons with disabilities at Carleton University, and ensuring an accessible and inclusive work environment, as well as contributing to employment initiatives.

The following feedback was received regarding the Employment and Employee Support theme:

- No designated accessibility resource/support/system in place for employees. Need formalized processes. People don't know where to go for support currently.
- Desire for more involvement from HR in supporting the accessibility needs of faculty and staff
- Academic hires must negotiate accommodations and support with their Chair, which can be problematic for numerous reasons (e.g. appropriate training, power dynamics, funding, discretion, etc.)
- Accommodations that are granted on a discretionary basis (from supervisor, manager, Instructor, etc.) can be problematic. Further, using discretionary funds to grant accommodations is problematic (e.g. creates tensions, no allocated funds exist specifically for accommodations, etc.)
- Difficult for persons with disabilities to find work. Carleton offering jobs for persons with disabilities is a step toward inclusion
- There is a feedback loop. If your classes are designed to accommodate a broad variety of disabilities, if you get employee accommodation right, the implicit message that is sent is that persons with disabilities can be in employment positions. This can serve as a recruitment tactic as well.
- Students don't visibly see students with disabilities working. People with disabilities working on campus should not be an anomaly.
- More inclusive hiring practices
- Formalized procedures for asking for accommodations during the hiring process
- Focus on long term employment
- Stigma and attitudinal barriers exist among some employees. Can result in a reluctance to disclose in some circumstances
- Student staff accommodations/support doesn't seem to be a formal process for this, it is the discretion/responsibility of the supervisor
- All employees are free from ableism inclusive
- Clarify accessibility and accommodation process
- Ensure representation
- Prioritize hiring disabled faculty
- Support accommodation needs of all employees
- Ensure that employees have tools and devices
- Central accessibility budget
- Central office including HR and Equity
- Stats on persons with disability employment and bridge gaps including hiring
- Create a budget to pay for access needs
- Dedicated HR Support for accommodations/accessibility



- Access to funding to implement accommodations right now the financial burden is with the hiring department
- Create a non-profit social enterprise for hiring students from PSI in Ottawa
- Include employee feedback in space design
- Hire an accommodations ombudsperson
- Create clear policies around flexible work environments it is possible to balance productivity and employee wellness
- RHFAC rating of gold complete as the next phase of healthy workplace
- Student support services are sometimes relied upon by non-students to receive support, even though this is outside their mandate (support can be discretionary and inconsistent)
- When issues arise, they need to be fixed in a timely manner
- There should be a clear and documented process for requesting an accommodation
- Getting accessibility support through the union can feel like all or nothing. You grieve or say nothing. Grieving feels combative.
- TA's aren't getting specific training on accessibility
- Career development funds should be available for people with disabilities to be able to transition employment with the university (eg. Contract Instructor to full time, contract staff to permanent staff, etc.)
- Sometimes doctor's notes say exactly what the employee wants, not what the functional limitations are, which can feed into a perception that it is easy to go to the medical centre and get an excused note, that some people might be abusing this.

The Coordinated Accessibility Strategy proposes the following objectives and recommendations in the Employment and Employee Support theme:

### **Objectives:**

- 1. Greater representation of persons with disabilities at all levels among Carleton employees.
- 2. Inclusive and accessible hiring policies and practices, and working environments.

- A. Improve processes on campus for disability-related accommodations and supports for employees.
- B. Review employment-related policies and practices that support accessibility and accommodations.
- C. Provide targeted opportunities across campus that promote career development and training for Carleton employees with disabilities.
- D. Evolve supports for accessibility and accommodations to meet the needs of employees.



# **Student Support Services**

This theme refers to a range of student support services related to accessibility (e.g., Paul Menton Centre, Health and Counselling Services, Carleton Disability Awareness Centre (CDAC), and Career Services).

The following feedback was received regarding the Student Support Services theme:

- Not enough supports for co-op students with disabilities.
- Attendant care
  - o Job description needs to be more clear as to the actual requirements of the job
  - More training for employees is required
  - More employees should be hired
  - Increased communication about this job opportunity could increase interest from trained/experienced students
- Should be 24 hours student support services available
- Services should focus on the needs of the student
- PMC on the 5<sup>th</sup> floor of University Centre (only one elevator that goes to 5<sup>th</sup> floor, which experiences outages). Location of PMC does not make sense given the infrastructure
- Work study and coop supports for students with disabilities
- Participation in clubs and societies for students with disabilities. Are clubs and societies accessible, how do they accommodate and where do the funds (if needed for accommodation supports) come from?
- Must be mechanisms in place for students to give feedback about services (such as PMC), and whether they are meeting needs, accessible, ect.
- The PMC should analyze its data for students with disabilities to improve its services. For example, if the PMC could identify things like how common certain disabilities are, what cofactors tend to be associated with them, what accommodations were effective and ineffective, and what the outcomes were, it might be better able to assist or make suggestions for students.
- The PMC might also consider seeking some input or assistance from the university's neurology, psychology, sociology, and human rights departments as they might have helpful insight into improving services.
- Need to have opportunities for students to build self-advocacy skills.
- Getting accommodations can feel adversarial, which may be a barrier
- Desire for PMC to take on an advocacy role on behalf of students with disabilities. PMC should not only be accommodating on an individual level, but be actively involved in remediating institutional problems that cause barriers to inclusive education
- PMC not having the time/resources to meet the needs/requests of all students. Some delays in response/service.
- Ensure students have access to services
- Make opportunities for student with disabilities to participate in engaging HIPS
- Welcome students with disabilities
- Go beyond accommodations (while continuing to accommodate)
- Have each unit develop accessibility objectives



- Increased training for student volunteers and staff (for example note-takers) around accessibility to mitigate need for person with disabilities to have to always communicate their needs. Can create tension or discomfort for person with disability.
- Need dual focus on helping students be more effective learners and instructors to teach more effectively
- All accommodation staff and accommodation providers should be required to read through Ontario's Human Rights Commission's policy on "Accessible Education For Students With Disabilities"
- Resources need to be in place to accommodate when necessary. If the answer to an
  accommodation request is a denial based on lack of resources, evidence should have to be
  provided that it is not feasible.
- Some people saying no to accommodation requests without justification, should have to be substantive evidence provided
- The financial withdrawal deadline and putting a withdrawal on the transcript might be discriminating against students with disabilities. Need time to try before deciding to withdraw, the deadline should be pushed back.
- Costs more to take a part time course load, which could be discriminatory for people with disabilities
- Help provided should be personalized, this is an impediment to accessibility
- Improve accessibility by alleviating some of the burden on students by making teaching and learning environments more accessible.
  - Just because some students may meet the diagnostic criteria for a disability doesn't mean that labeling them with one and then blaming the label for the problem always does an adequate and good job describing the full nature and cause those difficulties. Without a holistic understanding and acknowledgement of the root cause(s) of student difficulties, it's hard to provide appropriate and meaningful help; it also results in students being faulted while institutional problems (such as problems with teaching) are largely ignored and left to endure.
- PMC learning strategists don't always have the level of expertise the student needs
- Accessibility could be a factor that students consider when selecting Carleton
- Increased knowledge about accessibility supports for students
- Students should be able to get support without being registered with PMC
- Improved campus tours to highlight accessibility and disability supports
- Two types of accommodation: compensatory and remedial. If it truly cares about meaningful and inclusive access to education, Carleton needs to provide both types of accommodation concurrently--not just compensatory (low-cost and low-impact) accommodation. The interventions provided by Carleton are almost entirely generic, low-impact, compensatory ones (rather than remedial) that focus exclusively on the student and ignore institutional issues.
- For all accommodations, the efficacy of any measures should be monitored, steps taken to understand why they may not be working, and to improve and adjust them if they are ineffectual for individual students. If necessary, professionals with appropriate and relevant expertise should be hired by the university to assist.



- A barrier is the lack of access to mental health services, including excessive and long waiting list; stigmas and exclusion facing students with mental health
- The current draft could be improved by creating co-op programs to support future employment for students with disabilities;
- The current draft could be improved by enhancing student support through services provided by the student support centre: Carleton Disability Awareness Centre (CDAC)
- The current draft could be improved by improving access to mental health services and tackling stigmas against mental health

The Coordinated Accessibility Strategy proposes the following objectives and recommendations in the Student Support Services theme:

### **Objectives:**

- 1. Ongoing capacity for services to fully support students with disabilities to achieve academic success.
- 2. Supports for students with disabilities and accessibility expertise across all students services and the broader campus community.
- 3. Excellence in services for students with disabilities.

- A. Optimize resources to be responsive to the growing needs for accommodation and support of students with disabilities.
- B. Review student services programming with consideration of students with disabilities.
- C. Provide accessibility and disability-related training specific to different student services programs.
- D. Build knowledge, awareness, and attitudes in accessibility and accommodations across all student facing services and points of contact on campus.
- E. Establish formal student feedback and program evaluation protocols for disability-related student services for continuous quality improvement.



### **Research and Development**

This theme refers to academic research and application of research to campus and community development in accessibility.

The following feedback was received regarding the Research and Development theme:

- More public facing research outputs to help address attitudinal barriers
- Interdisciplinary/cross-faculty 'research clusters' dedicated to accessibility/disability
- The voices of persons with disabilities need to be included in the research and development being done in the area of accessibility
- Need to ensure we are doing research with persons with disabilities, not on persons with disabilities.
- Funding should be given to persons with disabilities doing research regarding disability rather than an able bodied person
- Increase interdisciplinary community based participatory research
- Build the knowledge base in accessibility
- Research chair(s) in accessibility
- Create research chairs in disabilities studies and accessibility
- Develop DBST minor into a major and grad program and create faculty hires to build the program
- Stimulate R&D in this area (e.g. research chairs)
- Encourage research impacts to inform campus culture
- Increase research funding
- Increase research visibility and leadership
- Foster opportunities for students and community to work together
- Adopt CU as a Living Lab where research impact can inform and be put into practice
- Incorporate research advances into our campus (e.g. AFI idea)
- Create a concentrated research strategy for Accessibility and Disability
- Create 2-3 research chairs in accessibility and disability Tri-agency secretariat indicated this is essential
- Provide institutional resources to help support BOTH accessibility and disability research on campus
- Provide training of importance of EDI in research team and partnership development.
- Stronger ties with federal and provincial governments
- National Centre of Excellence
- Lack of accessible condition for disabled researchers and students



The Coordinated Accessibility Strategy proposes the following objectives and recommendations in the Research and Development theme:

### **Objectives:**

- 1. Increased research activity in accessibility; particularly interdisciplinary, participatory research, including those that address systemic and attitudinal barriers.
- 2. Community of world-class accessibility researchers, particularly researchers with disabilities.
- 3. Increased awareness, recognition, and coordination of research activities in accessibility both internally and externally.
- 4. Significant contribution and leadership of Carleton University researchers to building a published knowledge base in accessibility.

- A. Develop a strategic plan for accessibility research and knowledge mobilization (e.g., research informed campus initiatives).
- B. Create a university-wide network of researchers in accessibility.
- C. Grow the research capacity in accessibility, including increasing the number and retention of researchers, research funding, research infrastructure, and community partnerships.
- D. Pursue research chair(s) in accessibility.
- E. Establish academic programming to support accessibility research.



# General Feedback

The following feedback was identified as more general feedback related to the Coordinated Accessibility Strategy, which has influenced the holistic development of the Strategy.

- Generally, I feel Carleton pays a lot of lip service to accessibility but is falling very short on execution.
- Challenges with accessibility definition. Suggested to reframe the definition of disability in line
  with national and international human rights standards, such as the Convention on the Rights of
  Persons with Disabilities (CRPD) and the Accessible Canada Act. According to the
  CRPD, disability is defined as "an evolving concept and that disability results from the interaction
  between persons with impairments and attitudinal and environmental barriers that hinders their
  full and effective participation in society on an equal basis with others."
- Definition of accessibility in the document is dated, reactive rather than proactive and puts the onus on the individual to reach out and identify what they need or adapt. Feedback that the definition is based on accommodation model rather than a system-wide approach to access
- Should be looking at Accessibility definition from local legislation, such as AODA. This should be superior to UN definition.
- The definition of accessibility in this draft is generally individualized, which puts the onus on individual student and faculty to have to approach services, rather than holding the institution accountable for its responsibility to ensure an accessible campus for all.
- There is a culture of ableism on campus
- Need to tackle the stigma around Mental Health
- The scope of this conversation is already laid out by things like the Human rights code, the administration does not need to decide what it is, and we need to look at the perspectives out there. There is already a series of obligations and defined scope
- Creating a Coordinated Accessibility Strategy is a good idea
- There is a lot of responsibility on the people with disabilities to do the work and advocate for their needs.
- Too much emphasis is put on the person with the disability having the problem, not enough of a holistic focus, not looking at the larger problems
- The current framework reflects the use of an able-bodied/ able-minded norm, which focuses on individual's need, rather than on tackling existing structural barriers.
- The individual's need and preference is specific and diverse, which reflects the challenges of creating universal design on campus. However, the Coordinated Accessibility Strategy must address structural conditions of inequality in relation to education, employment, funding, services, and hiring priorities.
- Increase communication about the consultation for the Coordinated Accessibility Strategy, particularly for students.
  - Students registered with the PMC should have been directly e-mail about the project
- The committee should review Ontario's Human Rights Commission's policy on "Accessible Education For Students With Disabilities" to help inform the creation of the strategy.



- The Ontario Human Rights education policy makes it clear that accommodation is an \*\*institutional\*\* responsibility and does not reside solely with the Office for Students with Disabilities.
- It's not necessarily conscious attitudes that contribute to inaccessibility, it is the status quo.
- We need to stop thinking about whose fault it is, and focus on who is going to fix it.
- Coordinated Accessibility Strategy Committee should be representative of the diversity in the community in terms of accessibility.
- Different people prefer different language around disability and how they chose to self-identify
- Accessibility should feel like an automatic part of the conversation around anything (vis-à-vis environmental sustainability)
- The main "Listening Phase" of the consultation process should also be a longer than just two months--especially since it was scheduled for November-December when the semester was ending and exams and holidays are happening.
- Consider consulting with alumni as part of the creation of the Coordinated Accessibility Strategy
- Consider different mechanisms for consulting with stakeholders for the creation of the Coordinated Accessibility Strategy (town halls, individual interviews, online, Carleton App, etc.)
- Concerned that feedback won't be adequately reflected in the strategy, there should be an opportunity to provide additional feedback
- Generally, it was observed that the current draft is broad, which may be difficult to generate specific comments but can provide room for consultation and create change. While we suggest some issues and strategies for improving access and accessibility below, we highlight the need to question key assumptions/motivations underlying the construction of the Coordinated Accessibility Strategy:
  - Does this policy aim to create an accessible culture for all students and faculty/staff (with disabilities), or does it aim to address the AODA's compliance requirements?
  - Does this policy aim to create a barrier-free, equitable and accessible campus, or does it seek to accommodate individual difference?
  - How can we tackle structural conditions of inequality of disabled people, which go beyond the provisions of individual accommodation?
  - Who benefits from the development of this policy?
  - Accessibility to what? Accessible for whom?
- The current draft could be improved by reframing "accessibility" in line with the creation of an accessible culture which tackles inequality on and off campus



### **Online Feedback**

The following feedback was received through email and the anonymous feedback online form.

Date	Format	Content	Theme
		I think the timeline looks good. One area of interest is physical campus - while we are doing many great things, this is still a definite area of	
		improvement. The recent decision to remove plastic straws from dining services locations has actually made us LESS accessible. Many	
		individuals with disability require plastic straws, as paper straws can easily weaken in hot liquids or may not be flexible enough. We should	
26-		add back the option to provide plastic straws on request across campus, so we're not disadvantaging one of our important groups across	Physical
Oct-18	Form	campus.	Campus
		I'm glad to see this strategy and timeline in progress. What is disappointing, however, is that even the newest building on campus (the	
		Health Sciences building), is not fully accessible. There are no automatic door openers in place for any of the internal doors leading to the	
		hallways where the faculty and administration offices can be found. These heavy wooden doors are always closed, and apparently need to	
26-		be kept closed for fire regulations, thus making the faculty and administrative offices inaccessible to many students with physical	Physical
Oct-18	Form	disabilities.	Campus
		I believe that incorporating tunnel names on campus would allow us to be more accessible and user friendly to students with disabilities.	
27-		Being able to give directions with tunnel names would likely greatly help all students. After all we have street names on campus, why not	Physical
Oct-18	Form	name our tunnels too?	Campus
		One accessibility concern I have noticed around campus are the many washrooms in various buildings that are labelled as accessible but in	
		reality are not. An example is room 2282 Mackenzie building, with a wheelchair sign on the door - see image attached. This door must be	
28-		opened manually as there is no accessible button to open the door, so I'm not sure how this and other doors get labelled as wheelchair	Physical
Oct-18	E-mail	accessible?	Campus
29-	_	More security cameras and bright outdoor lighting should be installed on the campus. Many of the curbs and sidewalks also need to be	Physical
Oct-18	Form	painted or re-painted with fluorescent yellow paint in order to be visible in low lighting. Thank you.	Campus
		[Redacted]. It is beyond my comprehension that Carleton does not yet have accessible doors on all campus classrooms or, at the very	
		least, on classrooms that also contain accessible workstations and thus could be expected to be assigned to classes with students or	
		faculty who need such a door! My class has also been moved [redacted], with each new room having new accessibility challenges for my	
- • •		students. Is there really no way to put a note on the file for my class that we should not be moved to an inaccessible classroom, forcing my	
7-Nov-	-	students' learning to suffer while I try to find us a new room [redacted]? I am glad there is a new attention to accessibility, but good grief,	Physical
18	Form	this all seems very basic to me.	Campus
		Dear VPs:	
		Thenk you for heading up this important initiative 9 for the experiment of provide input. I have elected to represe define the to you with an	Employment
		Thank you for heading up this important initiative & for the opportunity to provide input. I have elected to respond directly to you rather	Employment
		than via the website as I am not certain my suggestion falls within the scope of this initiative.	and employee support
8-Nov-		The info at the end of this email is contained in the standard offer of faculty employment under the Workload section & I wish to draw	support
18	E-mail	your attention to the last clause that requests new hires to discuss accommodation needs with their Chair. Including this clause in the	
10	L-IIIali		

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		<ul> <li>Workload section certainly signals CU's commitment to address accommodations within the context of teaching, research. &amp; service duties but it also raises at least2 concerns.</li> <li>One is it places new hires who are in need of an accommodation, are less than comfortable negotiating with their Chair shortly after arriving on campus. In addition, I suspect many Chairs have not been briefed on how to address these concerns, which could lead to uneven interpretations of what is needed, how to manage the discussion &amp; how to address the matter.</li> <li>The other issue is accommodations, whether these be a single intervention such as a specialized desk or office renovation or a longer-term reoccurring financial commitment such as salary &amp; travel for a sign language professional, might best be considered as "routine" workplace needs that should be part of the employment offer rather than added onto a position after both parties have signed terms of employment documents. And there can be substantial costs, especially with longer term reoccurring commitments that should be factored into decisions from the outset.</li> <li>For these reasons, I am asking if a discussion on moving workplace accommodations from the post-hiring stage to the employment negotiation stage is warranted?</li> <li>At this time, my intention is limited to drawing attention to this concern &amp; if appropriate, adding it to the agenda of the Ctte responsible for the Coordinated Accessibility Strategy Consultation. In addition, I have focused on the concern rather than solutions and not addressed similar concerns regarding professional staff &amp; the workplace. These &amp; other matters can be left for another time.</li> </ul>	
		[Redacted] Hello,	
		<ul> <li>There has a been concentrated effort over the past few years to ensure that documents visible to the public are accessible by visually-impaired clients who screen-reading software. These are mostly administrative and promotional material.</li> <li>[Redacted] the PMC is ensuring that course readings for visually-impaired students are accessible. Readings come from many sources such as textbooks, journal articles, PDF's of select chapters posted on cuLearn, and course packs. All can be available as PDF's and the layout of text books journal articles make conversion to an accessible Word format relatively easily, albeit with the intervention of a support person [redacted]. However, scanned documents and course packs are often of poor quality for even sighted students and conversion can be time consuming to ensure accuracy.</li> <li>What would help is a concentrated effort by several stakeholders – PMC, Library, EDC, Chairs and Deans, for example – to encourage:</li> <li>1. Clear PDF and paper articles posted on cuLearn and course packs, respectively. This would mean to not use material that is blurred,</li> </ul>	Education and training
15-		underlined, or have other marking that is often difficult for even a sighted student to read. As well, clear copies represent the University	
Nov-18	E-mail	well. The Library can help source clean copies and also handle fair-use under the copyright laws to help eliminate paper coursepacks.	



		2. Ensure that course readings (be the podcasts, videos, print content) that are via web links to sources outside the University are links to accessible content.	
		It is, of course, important that instructor retain full control of what content they want to deliver. Delivering inaccessible content is never deliberate but from a lack of awareness.	
		I would like to contribute my findings and experience to any committee.	
		[Redacted]	
		As a campus with many different levels and interconnected buildings, it is very challenging to navigate if you cannot climb stairs. The	
		number of elevators is limited, especially in the Student Centre and much of the physical infrastructure (walkways and tunnels included) is	Physical
16- Nov-18	Form	aging and needs repairs. Please evaluate main routes and tunnels for accessibility (elevators, automatic door openers). A review of flooring, sidewalks and pathways for cracks and tripping hazards would also be very helpful.	Campus
		Hi!	
		[Redacted] here, writing in response to the recent call for feedback in response to Carleton's Coordinated Accessibility Strategy. First and	
		foremost, I wanted to say that I think this is a wonderful initiative and I would like to thank the members of the READ initiative, as well as	
		the Provost's office, and everyone else involved. Thank you!	
		In addition, I have one suggestion that would fall under the physical campus theme. The washrooms in the Loeb Building recently	
		underwent some much needed renovations, including the addition of some wheelchair-accessible washrooms. This was a very good thing	
		of course. However, in my view, one change to the washrooms is problematic, namely the new automatic hand dryers. They are	
		exceptionally—and, I believe, ear-damaginglyloud. They are so loud that I no longer use them; I would rather have wet hands. Also, I am	
		[redacted] inches tall, so my ears are almost [redacted] above the hand dryers. I can't imagine how loud those dryers must seem to a	Physical
		person who uses a wheelchair or to a little person for whom the dryers would be closer to head-height. I know several students who are	Campus
		on the Autism spectrum who cannot tolerate the volume of new hand dryers, and I know of at least one student who brings ear protection	
		to campus specifically because of them.	
		If the university would like to make the campus more broadly accessible, I would suggest replacing those hand dryers, not just in Loeb but	
		wherever they are installed on campus. Perhaps they could be replaced with quieter automatic hand dryers or, better yet, nice quiet paper	
		towels.	
		Thank you again for undertaking this important initiative.	
19-		Best wishes,	
Nov-18	Form	[Redacted]	
			l



20- Nov-18	Form	The physical campus needs to be audited for accessibility and include the feedback of experts in barrier-free design. The campus should be inclusive of people requiring a wide range of physical accommodations - for example, mobility, visual, sound, sensory (i.e. autism), etc. I have noticed that many of our new buildings and recent renovations that claim to be accessible but are not very accessible. For example, the ramp and door connecting Steacie to the tunnel; a bathroom on the 8th floor of Dunton Tower was renovated to be a barrier-free washroom but is not at all accessible for anyone in a wheelchair; etc.	Physical Campus
20- Nov-18	Form	There should be an audit and review of our current communications for accessibility, not only websites and brochures, but should also include a random selection of course materials as well. We need to know where we are in order to prioritize what needs to be done first.	Information and Communication
20- Nov-18	Form	I am interested and excited by this Coordinated Accessibility Strategy, perhaps most especially by the theme dedicated to "Research and Development". One of the most critical aspects to ensuring genuine accessibility is to address attitudinal barriers, which further public-facing research outputs can help with. There are a few researchers on campus, even outside the Disability Studies Minor, who do just this. For instance Carleton University Disability Research Group: https://cudisabilityresearchgroup.wordpress.com/ I have heard about hoped for interdisciplinary / cross-faculty 'research clusters' and one dedicated to accessibility / disability seems very warranted and could offer further support for this strategy in the long term.	Research and Development
		Hello, I would like to provide some practical-level input to the accessibility strategy. Last year I had a student in [redacted] who requires an FM system to be able to hear. As my course involves a significant experiential learning project, the student needed to be able to hear other students speaking. The lecture rooms at Carleton (or seminar rooms actually) are not set up for this. The sound systems are designed for a one-way flow of information. It required a heroic effort on the part of IMS to design and bring a satellite sound system into the room that added two wireless microphones which my T.A.s carried around the room for students to speak into. (That worked well.) The current direction of educational development is toward increasing the experiential learning components of courses. The lack of ability for students to engage in a conversation with the instructor and each other will become more of an issue over time. Even hearing students cannot really hear each other speak in a room of 50 or 100 or more students. Addressing this issue, by providing sound systems with the capacity for 2 or 3 mics to be plugged in at once, will help all of us.	
3-Jan- 19	E-mail	Best, [Redacted]	
18-Jan- 19	Form	I think there are many barriers within our physical campus. Often accessible door buttons are not functioning or are not positioned in an accessible place for someone in a wheelchair. Elevators doors that should sense and reopen when something is between them are not a common standard, or if it is, are not functioning properly. I have witnessed renovations of washrooms to make them barrier free that have failed. It seems that barrier free standards are not being applied. For example, the women's bathroom on the 8th floor of Dunton Tower. It is configured poorly and would not permit a wheelchair to maneuver in the space. The automatic dryer does not function well and the sink is high with taps and a deep sink so that someone with mobility issues would have problems reaching the sink. The tunnel junction between Tory Building near the Galleria and the tunnels leading toward the library or River Building is often full of students campaigning for various issues. There is little space to pass and someone with mobility issues would encounter problems passing through safely and easily.	Physical Campus



18-Jan- 19	Form	I find that many of our communications continue to be in formats that do not comply to AODA. For example, I receive on a regular basis email invitations that use text in flat images or flat PDFs that are not accessible. There is little information for staff and faculty on how to make their communications accessible or the minimum standards of compliance. There should be an online toolkit for administrative managers, faculty and staff that provides accessible templates, checklists and instructions of how to produce accessible materials. There should be ongoing communications with easy to apply best practices, such as clear print guidelines for printed materials, how to make videos more accessible, etc.	Information and Communication
		Carleton has general guidelines regarding accessiblity in place but they are insufficient to meets AODA requirements. There is nothing for	Coordination
18-Jan-		front line managers, staff and faculty beyond the awareness modules provided by the province. We are lacking practical resources to	and Leadership
19	Form	enable everyone to comply to AODA and enhance accessibility on campus.	Theme
18-Jan-			General
19	Form	Generally, I feel Carleton pays a lot of lip service to accessibility but is falling very short on execution.	Feedback
18-Jan- 19	Form	There are many classrooms without accessible door buttons. Many accessible door and elevator buttons are located too high for students with disabilities to use without assistance from an able-bodied individual. I believe censored pads would be very useful to increase independence of our student with disabilities.	Physical Campus
23-Jan- 19	Form	<ul> <li>Equal access for everyone</li> <li>Ensuring the conditions that allow people to reach their full potential without barriers.</li> <li>Equity</li> <li>Why do you think these areas are important (or not)?</li> <li>each area is important because without even one of the themes, people with a disability are excluded or discriminated against and are not given the full opportunities they should be given.</li> <li>Without these areas, many people with disabilities are not able to reach their full potential as they do not have equal access to basic needs and resources.</li> <li>What are the assumptions underlying this construction?</li> <li>Are there other themes that are excluded?</li> <li>Assumed that the university wasn't as accessible as they claimed to be so there had to be more resources and programs available for those with disabilities.</li> <li>Select two themes which you are familiar with.</li> <li>Information and communication</li> <li>There isn't enough information as lots of people don't fully identify as disabled due to the stigma that follows and some people may feel targeted or uncomfortable.</li> <li>Since a lot of people are conducting these information systems and do not take into account what does and does not work with people with disabilities so the research lots of the time is single-sided and focused on one perspective (mainly the able-bodied) and developments are done based on what they believe needs to be done, not what actually needs to be done in accordance to someone with a disability.</li> <li>This lack of communication creates a barrier and a further developmental issue as people living with a disability do not have a voice in what's going on, and again they're being worked against not with.</li> </ul>	General Feedback



19	Form	- Change formating. Digital Stratgey.	communication
23-Jan-		- Carleton's websites should be digitally accesable for all indivudlas using the website.	and
		- Create a digital theme.	Information
10		More communitation/ information from the university. Critiques on disability studies and ableism.	
23-Jan- 19	Form	- Closing off staircases and ramps in the winter which doesnt make it accesable for everyone in need.	Campus
22 101		- Not all tunnels properly accessable. Only accesable for one type of disability. Hearing loss, vission loss. Not accessable for all all students and thier needs.	Physical
		All buildings MUST have elevators.	
19	Form	ensure long time empolyment	support
23-Jan-		Be more inclusive.	and employee
		Students dont visably see students with disabilites working.	Employment
19	Form	Focus on the needs of the student.	Services
23-Jan-		Students lives shouldnt change/suffer. Provide a better service that works for the invidudual	Support
19		24 hour student support services.	Student
23-Jan- 19	Form	Accoutability for research. How are they maintaining research? How are we maintainng information and what are we doing with that information?	Research and Development
19 22 Jan	Form	We should be intergrating more of a crtitque to disability studies and other fauculties i.e. Archetecture, Policy.	training Descareb and
23-Jan-	E a maa		Education and
		them.	
		disabilities and make sure their needs are being met sufficiently and are not based on able-bodied people making those decisions for	
		- If there is going to be accessible universities and themes surrounding it, then there has to be communication between people with	
		<ul> <li>Students and adults living with a disability are sometimes unaware of what's going on and what implementations are taking place.</li> <li>Most times there is very little confrontation and inclusion.</li> </ul>	
		ways in which to make Carleton an accessible University.	
		- Voices of people with disabilities have been missed out in each area. They have been included very little when developing policies and	
		What have been missed out in each of these areas?	
		to class, when the job posting did not explain or list any of these requirements).	
		- Issues in job postings around disabled people (unaware of what the job entails, ex. Attendant care; washing, feeding, and bringing people	
		- Putting in more training for attendant care is needed, as well as more employees.	
		most jobs are not accessible.	
		- Nothing for co-op students with disabilities. Someone with a disability goes through the same hiring process as non-disabled people and	
		- A lot of people cannot find jobs. Carleton offers jobs for people with disabilities as a step towards inclusion. Although, PMC should hire	
		3) Employment	
		<ul> <li>Not with but on disabled people</li> <li>Doesn't specify where they're doing the research</li> </ul>	
		- Doesn't mention who they're going to fund to do the research.	
		2) Research and development	



23-Jan-		Having a disability awareness week. How can we change/ educate.	Coordination
19	Form	- Bring more advertisments for clubs.	and Leadership
23-Jan-		Who is the funding going to? It would be good if funding goes to people with disabilities to do research regarding disability, rather than an	Research and
19	Form	able-bodied person.	Development
		Need to improve the 24 hours attendant care service and provide better training for attendants to learn how to properly assist and meet the needs of student clients. There needs to be more knowledge in the general campus community about the 24 hour attendant care	Student
23-Jan-		service to increase the interest in trained/experienced students working on campus to improve and meet our fellow students' individual	Support
23-Jan- 19	Form	care needs.	Services
-	-		Information
23-Jan-		Need to consider technologies such as FM systems (updated versions for newer hearing aids and cochlear implants) and more assistive	and
19	Form	technologies for students.	Communication
		Accessibility is equal access for everyone and ensuring the conditions that allow people to reach their full potential without barriers.	
		Each area/theme is important because without even one of the themes, people with a disability are excluded or discriminated against and	
		are not given the full opportunities they should be given. Without these areas, many people with disabilities are not able to reach their full	General
		potential as they do not have equal access to basic needs and resources.	Feedback
23-Jan-		Are there other themes that are excluded? Assumed that the university wasn't as accessible as they claimed to be so there had to be more	
19	Form	resources and programs available for those with disabilities.	
		NOTE: All the feedback below is meant to be constructive and is intended to assist Carleton with its goal to improve access to education	
		and inclusively.	
		I would **strongly** encourage the committee receiving the feedback I have submitted to read though Ontario's Human Rights	
		Commission's policy on "Accessible Education For Students With Disabilities" as it considers how to improve inclusiveness and meaningful access to education	
		(http://ohrc.on.ca/sites/default/files/Policy%20on%20accessible%20education%20for%20students%20with%20disabilities_FINAL_EN.pdf).	
		There is a wealth of very useful information in this policy document that would greatly benefit, inform, and guide Carleton as to how to	
		improve access and inclusively to educationassuming of course that Carleton is sincere and serious in its stated endeavor. It would be a	Education and
		travesty and enormously neglectful to ignore this public recourseespecially as it comes from the Human Rights Commission itself and is	training
		specifically about improving inclusively of education. (Coincidently, there are also other educational-related links and documents available	0
		on the OHR website which are also worth looking at. I would encourage Carleton to begin with the educational policy document.)	
		Also, accommodation staff and accommodation providers should be required to read through the Ontario Human Rights Commission's	
		policy as a condition of employment. Otherwise, they cannot do their jobs effectively. The sense I get from talking with university staff and	
		from how they approach accommodation is that they are not familiar with it (or only vaguely so) and of the extent of their obligations. As	
		well, I sense that Carleton is taking an overly narrow interpretation of the OHR Code. The OHR educational policy describes and	
28-		exemplifies the intent of the OHR Code. Carleton should be striving for more and aim to follow the OHR's policy if it is serious and sincere	
Feb-19	Form	about providing meaningful accommodation.	



The argument given by [redacted] that "there are inconsistencies with the application and requirements of human rights" is largely irrelevant and seems more like an excuse to maintain the status quo and resist improving services so that changes and accomodations are meaningfully helpful. As Appendix B in the OHR policy states: the policy exists to "provide guidance on interpreting provisions of the [Human Rights] Code. The OHRC's policies and guidelines set standards for how individuals, employers, service providers and policy-makers should act to ensure compliance with the Code." The policy also states that "OHRC policies have been given great deference by the courts and the HRTO, applied to the facts of a case before the court or the HRTO, and quoted in the decisions of these bodies". So, although some inconsistencies/flexibility do exist on certain issues, the fact of the matter is that overall, the intent and sprit of the policy seems more consistent than inconsistent and the policy makes fairly clear the intent of the OHR Code and how it should be applied.

-- It should be \*mandatory\* for all educators (eg. professors, instructors, etc.) to attend periodic seminars that (a) teach them how to teach inclusively (such as teaching for students with disabilities) and (b) that familiarize them with their obligations under the Ontario Human Rights Educational policy. This is necessary because with some instructors there are serious problems with the quality of teaching which cause significant problems and negative long-term consequences for some students.

With regards to human rights educational obligations and policy in the Ontario, educators at Carleton do not seem fully aware of how to properly accommodate students with disabilities nor of the full scope of their obligations. Educators need to be informed about their human rights obligations and learn how to teach all students effectively and inclusively. Happenstance whereby only some instructors are coincidently effective at teaching while other are not should not be the norm nor tolerated. Steps need to be taken to ensure all teachers are effective at teaching. The Ontario Human Rights educational policy makes it clear that post-secondary institutions, including universities, are required by law to be inclusive to and accommodate students with disabilities. It also gives numerous examples and descriptions of what this means. None of this would result in nor requires lowering academic standards.

To paraphrase [redacted], "some professors have been there a long time, are used to teaching a certain way, and that it would be unfair to expect them to change," and that, "its up to the professors to decide whether to grant accommodations". These statements are disingenuous. Standards change and educators need to keep up with the times and job requirements. To do otherwise is to ignore the Code, human rights policy, accept mediocrity, and demonstrates apathy and/or discrimination by the university to the needs (not wants) of students who are paying for and deserve \*quality\* (not sub-par) education. Any serious attempt to improve inclusively of education and fully apply the OHR policy must improving teaching at the institutional level. Students work very hard, struggling students even more so, and they deserve and expect that their school is making a serious and sincere effort to provide quality and inclusive education. As long as administrators and staff resist doing what's necessary to meaningfully accommodate and when they adopt an overly-narrow view of the human rights Code (either out of simple ignorance of the policy or because of ableistic attitudes), then students will not be meaningfully accommodated and education at Carleton will not be as inclusive as both human rights and morality requires.

-- As part of Carleton's broader OHR obligations to improve and facilitate meaningful access to education for all students, including students with disabilities, the office for students with disabilities (i.e. the Paul Menton Centre) needs to be actively involved in engaging with other departments to help remediate specific institutional problems (such as specific teaching problems that are identified) as part of the accommodations it should be providing.

If the PMC believes this is beyond the scope of its OHR obligations it is mistaken (more on this below). The PMC is in a unique position to do this. As a consequence of conversing with students, the department should be most aware of what the actual needs of those students are and what the institutional barriers and problems they encounter are. (Also, ideally and to improve accountability, the PMC should also



be periodically be requesting feedback from all PMC students at least once a year--which it currently does not do.) Since the PMC is part of Carleton and since accommodation is an "institutional" responsibility as explained in the OHR educational policy, then as part of accommodating students individually, the PMC also has a shared responsibility to be actively involved in remediating institutional problems (like lack of mandatory teacher training or poor quality teaching) that cause barriers to inclusive education. This does not mean that the PMC must be directly involved in training teachers--it only means that if it's not doing so already, the PMC needs to be proactive and do things like schedule meetings with faculty administrators to raise awareness of institutional problems (like poor quality teaching), propose solutions, and press changes at the institutional level so that, as a whole, the university makes improvements. In cases where students raises teaching problems with specific classes, the disability office has a direct responsibility to assist students by ensuring that these problems are resolved up to the point of undue hardship. Action by the university to resolve teaching problems in specific courses should be taken regardless of whether students are currently enrolled in those courses or planning to re-enroll. Failing to act to address institutional problems such as teaching problems is a failure by the university to meaningfully improve inclusively and accommodation.

The Ontario Human Rights education policy makes it clear that accommodation is an \*\*institutional\*\* responsibility and does not reside solely with the Office for Students with Disabilities. Furthermore the "duty to accommodate" under the OHR Code is not limited to basic classroom or test accommodations but also includes "both procedural and substantive obligations" but also includes (among other things) "design[ing] and develop[ing] new or revised facilities, services, policies, processes, courses, programs or curricula inclusively, with the needs of students with disability in mind". The OHR policy also states that "organizational policies, procedures and practices must satisfy both of these components". Also, "factors such as business or institutional inconvenience, student or instructor morale, third-party preferences, and collective agreements are not valid considerations in assessing whether an accommodation would cause undue hardship." The suggestion [redacted] that (to paraphrase) "it's up to the instructors to decide whether they will accommodate" is disingenuous. Unless the administration is committed to fully applying intent of the human rights Code (as explained in the policy), the effectiveness of accommodation and inclusively measures will be greatly diminished and largely ineffectual.

-- One of the primary reasons students have a hard time learning is because material is not presented/communicated in a way that is easily remembered.

It's true that when people are engaged with material they tend to remember it better. However, engaging students with material will only be beneficial if it's done correctly and not to excess; it must not overload working memory capacity which would hamper long-term storage of new information.

The article "The reason why modern teaching methods don't work" (https://www.irishtimes.com/news/science/the-reason-why-modern-teaching-methods-don-t-work-1.2115219) does a good job summarizing why:

"[C]onsideration of the short and long-term memory architecture of human cognitive structures clearly shows that child-centered minimum-guidance-during-instruction teaching methods cannot lead to effective learning. Long-term memory is the dominant structure of human cognition. Problem-solving skills draw on the extensive experience stored in long-term memory. The aim of all instruction is to add to long-term memory, and, if nothing is added, nothing is learned.

"Working memory can only process a small number of elements, and almost all information stored there and not rehearsed is quickly lost. Minimal guidance methods proceed as though working memory has no relevant limitations when dealing with novel information.

[Simultaneously trying to remember novel information while processing it often overwhelms working memory.] On the other hand, wholeclass teaching aims to give specific guidance on how to cognitively manipulate information and store the results in long-term memory."



		This is why, for example, that the presentation and quality of lecture notes from professors, as well as the clarity of instructions and explanations in labs matters. If the information is not organized well or incomplete, explanations are not clear, etc., then digesting and remembering this new and novel information becomes an extremely difficult task. It is important to keep in mind that having a disability does not mean a student is incapable of understanding, learning, and applying course material. However, they may not be able to learn at the same rate as non-disabled students or keep, especially without accommodation and consideration/knowledge by educators of how human cogitation and learning works.	
		Every semester (or annually) the Paul Menton Centre (PMC) should contact and request feedback from their clients (i.e. students with disabilities). It is a mistake to presume that top-down decision making, while excluding the users of the system is adequate. The PMC and Carleton should then assess student feedback and act to improve services and address deficiencies. This will help improve accountability and hopefully the quality of service provided.	
		The PMC should analyze its data for students with disabilities to improve its services. For example, if the PMC could identify things like how common certain disabilities are, what cofactors tend to be associated with them, what accommodations were effective and ineffective, and what the outcomes were, it might be better able to assist or make suggestions for students.	Research and Development
28- Feb-19	Form	The PMC might also consider seeking some input or assistance from the university's neurology, psychology, sociology, and human rights departments as they might have helpful insight into improving services.	
		Quality support is more important than quantity. Unless the help (aka. accommodation) is meaningfully helpful (e.g. targeting the root causes of problems than just tying to treat the symptoms), having several "compensatory" support services is not very effectual. Professors/instructors should indicate a time range in which students should be able to complete their various assignments. School administrators and accommodation providers would then look at the official program calendar ( https://calendar.carleton.ca/undergrad/undergradprograms/) and create mock weekly schedules (for administrative purposes) for each program to ensure that the amount of work being assigned by professors is realistic. (These mock schedules could also be posted publicly for reference purposes.) For instance, if with a full course load the amount of time each assignment requires cannot be fit into a weekly schedule, along with all the other necessary weekly elements (classes, study time, commuting, sleep, some free time, etc.) this indicates that the workload expected of students is unrealistic and suggests that the university is partly responsible for creating conditions in which students be unrealistic. The workload must be reasonableotherwise, in addition to being unhealthy, it can create significant (and potentially insurmountable) problems for some students. The university should also start tracking how long students are spending on assignments and studying to more accurately determine what is realistic and to help improve teaching efficiency. I don't think it's a mystery why mental health is continuing to decline for students. Simply: Many students are probably overworked, fighting burnout, are stressed, and depressed. It's tempting for some to bursh off struggling students by saying only those with disabilities are having problems but there are various datasets that seem to indicate otherwise.	Student Support Services
28-		Accountability Report Backs") which is for the 2015-2016 academic year (https://carleton.ca/about/university-reports/), only 9.64% of all	
Feb-19	Form	full-time students at Carleton are registered with the office of disabilities. (The actual percentage of students with disabilities will be	



		slightly higher as the figure excludes part-time students with disabilities, students who haven't registered with the centre, absent students not enrolled in courses, or students who dropped out). Now, let's try and put that into perspective. Consider "Carleton's MAESD Key Performance Indicators (KPI) – 2017/18" ( https://carleton.ca/about/wp-content/uploads/MAESD-PI-for-website-2017-18.pdf, http://www.iaccess.gov.on.ca/OsapRatesWeb/enterapp/home.xhtml ) which is for the entire student population. On average, only 70% of undergraduate students graduate from Carleton, and of those who do, it takes them an average of 7 years. Considering that "a normal course load" is defined in the university calendar as 2.5 credits per semester (i.e. 5 courses per semester) ( https://calendar.carleton.ca/undergrad/regulations/academicregulationsoftheuniversity/acadregsuniv6/#6.4 ), the implied expectation is that students should be able to finish an undergraduate honors degree (20 credits) within 4 years. I think it's quite noteworthy that most students seem unable graduate within 4 years (and we're talking about all undergraduate students not just those with disabilities). In that context, it seems fairly clear that the so-called 4-year "normal" timeline to graduate is in fact nothing more than a lofty goal and suggests that course-loads are too heavy for most students. So, although most students are graduating, this obscures the fact that the majority of the student population is probably struggling. (Note: Of those students in co-op programs, one of those 7-years can be subtracted because co-op adds an extra year, but that still means that most students are need at least 2-3 more years than what the official expectation is.) Part of improving accessibility and inclusively on campus for education means ensuring the health and well-being of students. A toxic workload harms more than it helps, makes it harder to learn and graduate than necessary, and is antithetical to the goal of inclusive education. By posting time-ranges for	
28- Feb-19	Form	tell how much time is they should be aiming to spend on certain tasks. Carleton should do a better job ensuring that the campus is structurally safe. Although overall the campus seems structurally safe, I'm not confident that there's adequate periodic inspection of the premises. For example, there is a railing for steps that go down from the Tory building to the tunnels. The top of the railing has been damaged and is jagged metal. In fact, it has been this way for a few years at least. An unsuspecting student climbing up the steps could injure themselves if they tried to grab the railing at the top but didn't know it was damaged.	Physical Campus
28-		Carleton's READ Initiative (i.e. its coordinated accessibility strategy project) to which this feedback has been submitted should have been much better communicated to students. Not doing so gives the impression that Carleton isn't sincerely trying to increase inclusively and accessibility to education. For example, all students registered with the Paul Menton Centre should have **driectly** been e-mailed to inform them that this project exists and that they could submit feedbackbut this was not done. I would strongly recommend that the committee e-mail all PMC students to correct this before the opportunity to submit feedback entirely passes. What do I mean by "directly"? "Directly" means that the title of the e-mail should be relevant. As it stands, the only public e-mail I automatically received was buried within a university news packet with the title "State of the Raven: Winter Welcome Week, Capital Hoops Tickets and more!"which I (and I am sure other busy students) don't always read. It is only by coincidence that I learned about this consultation initiative. Lastly, the main "Listening Phase" of READ's consultation process should also be a longer than just two monthsespecially since it was	Information and Communication Theme
Feb-19	Form	scheduled for November-December when the semester was ending and exams and holidays are happening. Although READ is apparently	



		still taking in feedback while it continues its study and prepares its report, late feedback given during later phases of the study may not get	
		adequate attention and might have a reduced impact on recommendations the study ends up making.	
		Student-teacher feedback mechanisms need to be improved. Student-teacher feedback is collected at the end of every semester (i.e.	
		students rate their professor and leave some written feedback). The purpose is ostensibly to promote accountability and help ensure	
		quality teaching. However, there are several aspects to this initiative that are lacking that severely compromise its intended mandate and	
		bias the results. Carleton seems to be cherry-picking its statistics.	
		The two problems with the survey's are: (i) Ironically (or on purpose), students who most need help and wish to provide feedback are	
		denied the ability to do so. They simply fall though the cracks. Surveys are only e-mailed to students in the final week of the semester. So,	
		if you happen to be a student who had to drop-out earlier in the semester, you have no voice in the feedback collected. (ii) The surveys are	
		only with regard to lecture professors; they completely ignore laboratory instructors, which also play a vital role in courses.	
		I have brought up this matter on multiple occasions with numerous people but it seems to no avail.	
		Need to reduce ableism, stereotyping, and discrimination on campus. In particular, the university needs to stop jumping to conclusions	
		and presuming that problems with learning that students-diagnosed-with-a-disability have are entirely a result of their disability. The	
		university needs be more accountable by looking at the root cause(s) of student problems holistically (considering external problems that	
		might be causing/contributing to student difficulties instead of simply relying the stereotype that it's just because the student has a	
		disability), resolving teaching problems at the university when identified (instead of ignoring or not acting meaningfully to resolve them),	
		and providing "meaningful" accommodation (instead of accommodation that is overly-narrow and so generic in scope that it doesn't meet	
		the actual needs of students with disabilities).	
		Comments such as "that's the way you learn", "science is hard", "have you considered college" *without* any action being taken to fix any	General
		of the teaching problems and trying to provide meaningful accommodation are inappropriate. It is symptomatic of a culture of ableism	Feedback
		and complacency that exists to an extent among university personal on campus. It also diminishes students' trust that the university is	
		meaningfully trying help them.	
		Likewise, ad-lib responses such as "we don't have the resources to accommodate" or "we're too busy" without proof that	
		accommodations would exceed "undue hardship" as required and defined in the human rights code are inappropriate and pose barriers to	
		accommodation and inclusive education. Stating that an accommodation cannot be granted because it doesn't meet a certain arbitrary	
		requirement that isn't a bona-fide course requirement is inappropriate. (Note: Bona-fide course requirements should be publicly published	
		to increase transparency and accountability.) Dogging accommodation requests by making suggestions *without also* answering whether	
		the requested accommodation can be granted (or explaining why it can't be) is inappropriate. Saying that interim accommodations	
		(pending the receipt of a psycheducational report) cannot be provided is contrary to the requirements of OHR policy (and contradicts a	
		commitment made by Carleton in a written letter to the OHR commission; see Carleton's reply letter to the OHRC on page 326 of	
		www.ohrc.on.ca/en/learning-mind in response to the OHRC's letter in Appendix #1 on pages 15-18.). All this is not just my opinionthat's	
		consistent with what the Ontario Human Rights educational policy states (	
		http://ohrc.on.ca/sites/default/files/Policy%20on%20accessible%20education%20for%20students%20with%20disabilities_FINAL_EN.pdf ).	
		Although I believe that individually-tailored face-to-face assistance is the best kind, as part of the discourse into increasing inclusively and	
		accessibility on campus, I asked a Carleton staff member why Carleton wasn't focusing on remediatory interventions, a small part of which	
28-		might include suggesting self-help books that teach metacognative strategies (such as "Teach Yourself How to Learn: Strategies You Can	
Feb-19	Form	Use to Ace Any Course at Any Level" by Saundra and Stephanie McGuire) that might be part of a multifaceted approach to help improve	



their learning efficiency? The response I received was that interventions for adults with disabilities are ineffective. That response is \*\*not\*\* ok--it's based on assumptions and stereotypes and yet another symptom of a culture of ableism (even if inadvertent) among campus staff. Also, am I supposed to believe that adults, even those with disabilities, are incapable of learning and modifying their behavior? Obviously that's not true; just because you're an adult doesn't mean you can't learn and change. It might be harder for adults because established patterns might be harder to change--but that's different than it not being possible, given the right circumstances and assistance. Students who actively seek out help actually need it--badly. It's not ok to abandon students and not make a serious, holistic, and meaningful effort to help just because they are adults. What are these otherwise capable students with potential supposed to do if they can't get meaningful and sincere help? It's \*not\* an option (and goes against institutions' human rights obligations) to basically imply that students with disabilities are not worth investing in except with cheap, generic and overly-basic compensatory accommodations that don't really help them. (Side note: The university should not expect that the recommendations in psychoeducational reports are necessarily going to be very helpful overall. Unfortunately, many of the recommendations in psychoeducational reports may tend to be extremely generic and/or not necessarily applicable or particularly helpful to students.)

Stereotypes and misconceptions among staff regarding the nature of student difficulties seem to be common and need to be countered. In particular, the university needs to stop taking a black-and-white view of the cause(s) of problems struggling students are facing. Factors causing or contributing to student difficulties can be both internal and external to the student. This is why university needs to adopt a holistic view of things in order to try and be as objective as possible.

As part of providing \*meaningfully helpful\* accommodation and making the campus more inclusive, Carleton also needs to establish a comprehensive mechanism for communication and collaboration with other departments to address and resolve certain problems (such as with teaching). Under Ontario human rights educational policy, accommodation is an "institutional" responsibility. While there are some steps being taken in the right direction (such as Carleton's current accessibility study), the university overall seems to be insular and stubborn in its administrative thinking.

If struggling students are diagnosed with a disability, when providing accommodation, it's very telling that the university ignores acknowledging or resists meaningfully dealing with institutional problems that are negatively affecting those students. For example, problems with the quality and inclusively of teaching can cause or exacerbate student difficulties. Academic literature on effective accommodation emphasizes the vital importance of providing effective teaching and resolving teaching problems--yet the interventions provided by Carleton almost entirely generic, low-impact, compensatory ones (rather than remedial) that focus exclusively on the student and ignore institutional issues.

True, there are students who nonetheless succeed and finish their degree in spite of institutional problems. However, would those same students have done as well if circumstances in their life had been different? Not everyone's past and current situation is the same; their life experience and circumstances are among factors that impact their emotional well-being and cognitive development--all of which influences current academic performance.

Diagnosing a disability is not a fine science in the way that math or physics is--it relies heavily on correlations and has a subjective interpretative component. As every good scientist knows, correlation does not always necessarily mean causation. A diagnosis of disability



doesn't necessarily mean anything. This is because a disability diagnosis doesn't necessarily identify the specific underlying root cause(s) of a student's problem; all it mainly does is re-label an existent problem by a different name and points a target at the student while overall conveniently ignoring the influence of external factors. The university should consider that perhaps in some cases, student difficulties that are severe enough and which happen to satisfy certain diagnostic criteria to \*symptomatically\* qualify as disabilities might themselves actually be symptomatic and a result of problems caused/influenced/exacerbated by external problems (e.g. societal, systemic, developmental environment). For example, everyone knows and agrees that stress and depression negatively impact cognition. However, stress and depression are usually symptoms of external problems a person is experiencing rather than a pure result of genetics. Is it really wrong to consider the possibility that, for some students, long-term unresolved problems in a person's life may in part account for the symptoms that are later diagnosed as a disability? The university should not limit the help it provides because it \*thinks\* that a disability is immutable. Not all disabilities are necessarily permanent and with appropriate interventions some might even be remediated. If staff assume and treat people like they can't improve, then aren't we to a degree setting them up for failure? It's a fine like to walk to be sure. Regardless of whether some disabilities are genetic or immutable, all students labeled with disabilities deserve and \*need\* meaningful help in order to get though school--it's also the lawful obligation of every post-secondary institution in Ontario under the human rights policy. Besides problems with teaching, some additional examples of external causes/contributors of student problems include:

(1) A significant and increasing number of mental health problems among students in general in Canada and in Western society (not just those with disabilities) (eg. www.thestar.com/news/canada/2017/05/29/youth-mental-health-demand-is-exploding-how-universities-and-business-are-scrambling-to-react.html). Are we going to stereotype and blame everyone experiencing mental health problems as having permanent disabilities because of circumstances not entirely in their control?;

(2) The phenomenon of the widening gender-gap in education (e.g.:

www.conferenceboard.ca/(X(1)S(xkcmstdgoymukl1gi5fvgwh2))/hcp/details/education/gender-gap-

tertiary.aspx?aspxautodetectcookiesupport=1&pf=true , www.universityaffairs.ca/features/feature-article/minding-the-gendergap/#comments ) where more females are enrolled and graduating from higher education than males. In fact, "Canadian women aged 25 to 64 are 17% more likely than Canadian men to have a tertiary education" and "for every 100 Canadian men aged 25 to 34 with a tertiary education there are 125 women with the same" (Conference Board of Canada, see link above) . Maybe past reforms to make education more inclusive to females failed to sufficiently take into account neurological differences in how males and females learn--leading to an unbalanced curriculum that inadvertently discriminates against males?;

(3) The fact that the Canadian version of the WAIS-IV test regimen used in psychoeducational assessments has been found to have a flawed scoring system (Google the news) that tends to result in depressed IQ scores;

(4) Educational institutions' preferential but controversial use of inquiry-based learning verses direct instruction

(https://www.irishtimes.com/news/science/the-reason-why-modern-teaching-methods-don-t-work-1.2115219,

https://eic.rsc.org/opinion/the-case-against-inquiry-based-learning/2010103.article). Although teaching by actively engaging students in the learning process by having them learn on their own or in groups can facilitate understanding and retention, \*how\* that is done and \*to what extent\* is also extremely important as this affects how much information makes it into long-term memory (and if little information does, then little information is learned). If not done and balanced correctly, the extent and efficiency of learning will be compromised. The articles talk about how, for example, in a study direct-instruction was 30% more effective than the inquiry-based approach.;

(5) Province-wide documentation standards for mental disabilities do not exist and there is wide variation with regard to which



dimensions are being assessed and how limitations are being scaled. Also, with regard to recommendations in pschoeducational reports, on page 9 of the Academic Accommodations Project report (www.stlawrencecollege.ca/-/media/files/documents/about/mental-health-research/recommendations-accessible-version-sept-20-final-(1).pdf?la=en), it states "[...] the researches were aware of concerns expressed regarding some psychoeducational assessments in relation to both [in]consistent use of diagnostic criteria and recommendations for accommodations which were not consistent with test results [...],"; and

(6) As mentioned: psychoeducational assessments are not fully objective because they depend to an extent on the subjective interpretation of the examiner;

(7) It is known that long-term social isolation/exclusion can have negative neurological repercussions. It can cause depression which can damage the hippocampus (which causes problems, such as with memory). Social isolation and depression can decrease growth factors in the brain and lead to a vicious cycle where these growth factors are suppressed. It's not healthy for students to be given so much work without adequate tools, resources, supports, or consistent quality teaching that allows them to effectively manage it. Overworked students are isolated and depressed because their lifestyle is toxic and very unbalanced--they spend almost all their time alone studying and working in and outside of school. When do they have the opportunity to relax or have fun when they're so busy? Simply being around people (such as in a library or lecture hall at school) doesn't necessarily mean you're not socially isolated. Interactions on campus may not necessarily be meaningful because the primary focus is predominantly on getting the large amount of work done and moving on to the next assignment. For students who know how and are able to manage the workload with adequate efficiency, they pull though and graduate--but for others who struggle to cope the outcome is very negative. Is it really fair to jump to the conclusion that a "disability" is at fault and the root cause of the struggling students' problems? That's disingenuous and narrow-minded. There are many nuanced issues here, like isolation, that deserve meaningful objective consideration and remediation. ;

(8) " 'Labeling theory' is the theory of how the self-identity and behavior of individuals may be determined or influenced by the terms used to describe or classify them. It is associated with the concepts of self-fulfilling prophecy and stereotyping." That's another reason why Carleton shouldn't just \*assume\* "it's how you learn" and that problems can't be remediated for students with disabilities, and therefore never try to provide any remedial help (including resolving teaching problems that are identified).

Unfortunately, psychologists, schools, and government tend to conflate all these and other various issues and lump them symptomatically under the umbrella term of disability. This is disingenuous, perpetuates a narrow-minded and oversimplified view of the causes of mental disabilities, and leads to stereotyping and prejudice. Just because some students may meet the diagnostic criteria for a disability doesn't mean that labeling them with one and then blaming the label for the problem always does an adequate and good job describing the full nature and cause those difficulties. Without a holistic understanding and acknowledgement of the root cause(s) of student difficulties, it's hard to provide appropriate and meaningful help; it also results in students being faulted while institutional problems (such as problems with teaching) are largely ignored and left to endure.

It should be noted that the "human rights approach to disability...identifies wide variations in cognitive, sensory, and motor ability as inherent to the human condition and consequently, recognizes the variations as expected events and not as rationales for limiting the potential of persons with disabilities to contribute to society.' This approach recognizes 'the condition of disability as inherent to society, not some kind of anomaly to normalcy" (footnote 62 of the OHR educational policy).

Meera Ulysses from the Toronto student newspaper summarizes the gist of the problem fairly succinctly: "[...] [If ableism was less prevalent] the disabled student might be assumed as a natural inhabitant of the university environment and not as an outsider who must constantly prove their case [...]. However, we can ascertain that this subsuming of the disabled student into the university environment is



a process to which the university is [overall] actively opposed" (https://thevarsity.ca/2018/09/23/conceptualizing-inaccessibility-on-campus/).

There seems to be a misconception at Carleton about what the word "accommodation" means. "Accommodation" is just a simpler or alternative way of saying "providing help". Accommodation is necessary (and legally mandated under Ontario human rights) to facilitate access to education for students with disabilities. As mentioned, there are two types of accommodation: compensatory and remedial. If it truly cares about meaningful and inclusive access to education, Carleton needs to provide both types of accommodation concurrently--not just compensatory (low-cost and low-impact) accommodation. [Examples of compensatory accommodation include: extra time on tests, voice-recording pens, note takers, quite rooms to study, extra time on tests, mindfulness, rudimentary time-management tips, organizing software, etc..] Generic help is fine but only for simple problems and is not adequate or suitable for more complex problems. It is necessary to provide specialized help for complex problems and it should be tailored to address students' actual difficulties. Carleton is not focusing enough on remedial measures that would be more meaningfully helpful and anything less seems to be a dereliction of it's obligation under human rights to be meaningfully inclusive to students with disabilities.

Remedial accommodations to improve accessibility to education for students with disabilities should be two fold: (1) attempts should be made to improve students learning efficiency though individualized and guided help from specialized qualified professionals and (such as teaching them metagcognitive strategies), and (2) systemic problems (such as teaching problems or problematic policies/procedures) that are identified by students (and others) should be acknowledged and resolved (not ignored), regardless of whether the student has registered in or will retake a course. This is consistent with the Ontario human rights educational policy under which post-secondary institutions have an duty to make educational inclusive.

For all accommodations, the efficacy of any measures should be monitored, steps taken to understand why they may not be working, and to improve and adjust them if they are ineffectual for individual students. If necessary, professionals with appropriate and relevant expertise should be hired by the university to assist.

Carleton seems to have an overly-narrow interpretation of what its human rights obligations are for providing accessible and inclusive education which is extremely problematic. As stated in the Ontario Human Rights (OHR) educational policy the "duty to accommodate" is not limited only to very basic things like extra time on tests and note-takers, it also may include several other interventions, including improving the quality and inclusively of teaching. It also "includes both procedural and substantive obligations" that relate to "organizational policies, procedures and practices". As a report for OHR commission clarifies: "accommodation is an institutional responsibility and does not reside solely with the Office for Students with Disabilities" (www.stlawrencecollege.ca/-

/media/files/documents/about/mental-health-research/recommendations-accessible-version-sept-20-final-(1).pdf?la=en). It should also be emphasized that the OHR educational policy also states that "factors such as business or institutional inconvenience, student or instructor morale, third-party preferences, and collective agreements are not valid considerations in assessing whether an accommodation would cause undue hardship". So, for example, the PMC has a responsibility to engage with other departments to ensure that problems with teaching are adequately resolved. To do otherwise is to adopt a overly-narrow interpretation of the human rights Code that is inconsistent with the spirit of the Code as exemplified and described in the OHR's educational policy.

Accessing meaningful accommodation should not be a adversarial enterprise for students as it currently seems to be. The existence of ableism on campus, a lack of meaningful accommodation, and the failure to resolve institutional problems (such as problems with teaching, or procedural barriers), are all barriers to inclusive education and seems to demonstrate a degree of ignorance or apathy by Carleton regarding its human rights obligations and with Ontario's human rights educational policy.

In conclusion: A myopic approach to accommodation is inadequate, ineffectual, and inconsistent with the intent of the OHR Code as



explained in the OHR's educational policy. It's also morally questionable. Note: I would like to make clear that that staff/professors/administrators are kind and I believe are generally well-intentioned. Ableistic attitudes among some university personnel are not necessarily intentional but are nonetheless present in general. There's room for improvement. I'm glad Carleton is doing an accessibility study and seeking feedback from members of the Carleton community. I appreciate being provided the opportunity to provide feedback. I hope that everyone understands that my feedback is meant to be constructive and it's not my intent to cause conflict nor animosity.	
Inclusive education means that fewer students need to ask for accommodations and this reduces the cost on the university	