

Centre for Gender Advocacy Mapping Project

Revision Recommendations:

Concordia University's Student Accessibility Policy

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Contents

6	The need for a revised Student Accessibility Policy
8	Acknowledgements & Thanks
9	Background Information
10	1.0 Recommendations
14	2.0 Definitions
22	3.0 Recognition of intersecting identities and Experiences
25	4.0 Confidentiality
26	5.0 Responsibilities & Accountability
30	6.0 Admissions and Practicums
32	7.0 Self Advocacy
33	8.0 Training
36	9.0 Student Appeals
38	Bibliography

The need for a revised Student Accessibility Policy

[Concordia University's Policy PRVPA-14. Accessibility for Students with Disabilities¹](#) (Hereafter Concordia's Access Policy) was drafted over 16 years ago and implemented on April 2, 2003, from the Office of the Provost and Vice-President, Academic. Since 2003, the discourse and approach to Accessibility and Disability has greatly changed. In 2005, the Accessibility for Ontarians with Disabilities Act (AODA) was implemented requiring all post-secondary institutions across Ontario to meet certain standards of accessibility. We have also seen universities start to adopt new terminology and conceptualization of disability that aligns closer to the Social Model of Disability and Universal Design. Furthermore, many universities² across Canada are in the midst of carrying out multi-year access plans that indicate some progress. While many of the examples we draw upon are specific to Ontario, it is time for accessibility to be at the forefront of all universities' strategic plans whether or not provincial legislation guides that process.

An updated Accessibility policy based upon these recommendations authored by Concordia disabled alumni, aligns with Concordia's commitment to engage in partnerships that draw upon the diversity within Concordia's community.³ Furthermore, this review also contributes to Concordia's commitment to creating opportunity by "embracing" diversity⁴ through filling the gaps that currently create barriers for students with disabilities and hinder their ability to be full members of the Concordia community.

University Accessibility services centres such as Concordia's Access Centre for Students with Disabilities (ACSD) greatly contribute to the reduction of barriers for disabled students. Alongside the ACSD, we know there are many stakeholders within Concordia University who are committed to creating a welcoming community for students with disabilities. An updated policy will further create the environment for these commitments to flourish by guiding all stakeholders within the University.

Process

We reviewed Concordia's Student Accessibility policy based on a case study we conducted of accessibility policies from four different universities⁵ as well as the 2018 NEADS Landscape of Accessibility and Accommodation for Post-Secondary Students With Disabilities in Canada⁶ report. Furthermore, we draw upon principles from Universal Design, The Social Model of Disability, Disability Justice, and our own experiences as disabled people.

This review is tied to a larger community-based research initiative called The Mapping Project that came to completion in August 2020. Through the Mapping Project we highlight recommendations from Concordia students who identify as LGBTQ2S and/or disabled. You can access our full Mapping Project report on the Centre for Gender Advocacy's website.

¹ Concordia University Policy on Accessibility for Students with Disabilities can be found by [clicking here](#)

² See Ryerson University 2016-2019 ([click here](#)), Mohawk College 2016-2018 ([click here](#)), Western University 2017-2021, Brock University, Queens University 2016-2025.

³Concordia Mission Statement

⁴ <http://www.concordia.ca/academics/undergraduate/calendar/current/mission.html>

⁵Ryerson University, Brock University, McGill University, University of British Columbia.

⁶ NEADS, Landscape of Accessibility and Accommodation for Post-Secondary Students With Disabilities in Canada report can be found by [clicking here](#).

Barriers Students with Disabilities experience

It is difficult to provide accurate estimates of how many Students with Disabilities are enrolled in Higher Education as many universities do not collect statistics on students' disability status. While Accessibility Centres will have statistics on how many students are registered, not all students with disabilities are able to access these services due to financial barriers to receiving a diagnosis (specifically surrounding diagnosis for Neurodiversity that can be upwards of \$3000) among other barriers. The barriers that Students with Disabilities experience in higher education are well documented (e.g. Dolmage 2017, Ontario Human Rights Commission 2020). Some of the main barriers being, physical accessibility, attitudinal, ineffective dispute resolution and lack of individualization on accommodation requests.⁷ Additionally, budgetary restrictions have also been documented as a structural barrier that influences Accessibility Centre's abilities to fully accommodate students.⁸

Through focus groups, interviews and a survey we collected data from Students with Disabilities at Concordia. While this is further outlined in our Mapping Project report, below are some of the barriers that came from our analysis and have influenced our policy recommendations within this report.

1

Attitudinal barriers, including;

Professors dismissing reasonable accommodation requests from students.

Professors exhibiting stigmatizing attitudes towards students with disabilities.

Professors lacking training on how to respectfully receive a disclosure of a disability.

Professors who are uncertain regarding the kind of accommodations students can receive.

3

Inaccessible infrastructure and classroom layouts

2

Pedagogical barriers

Professors not teaching for a diversity of learners (i.e. using one method of curriculum delivery that is inaccessible to Neurodivergent students)

Lack of clarity surrounding evaluation criteria.

Inflexible attendance policies.

4

Service level barriers

Service providers having infrequent training on accessibility.

Students being denied documentation.

⁷ Main Barriers to Education for Students with Disabilities (Fact Sheet),” Ontario Human Rights Commission, n.d. <http://www.ohrc.on.ca/en/main-barriers-education-students-disabilities-fact-sheet>

⁸ Ibid

Acknowledgements & Thanks

This work took place in unceded Kanien'keháka territory by people who are settlers to this land. We recognize the Kanien'keháka as the custodians of Tiohtá:ke/Montreal where we have the privilege to conduct research and work on community-based projects like this.

We are extremely grateful for the hard work and dedication of our Research Assistants, who gave us their invaluable feedback and assisted with research, scribing, and developing this review. Another thank you goes to our Mapping project advisory committee (who is listed in full on our main report), especially to those who reviewed and edited this report, Joseph-Alexandre Darrous, Noah Eidelman, Monica van Schaik and Mikaela Clark-Gardner who are members of our Mapping project's community advisory committee. We also would like to thank the Concordia Council on Student Life and the Concordia Student Union for the financial support that made this project possible.

Background Information

Though this review was conducted mainly by people with disabilities, we do not collectively represent one disabled community as each person with a disability has a unique experience identifying with a disability and navigating barriers. We have chosen to switch between the use of identity-first (i.e. disabled person) and person-first (person with a disability) terminology in order to represent both the choices of the authors and disabled advisory committee members who use identity-first terminology and the use of person-first language in the University.

Our work has been shaped by many disability movements and activists who work tirelessly to create a more accessible world. We would like to acknowledge Disability Justice in particular as it often goes unmentioned in Disability related work. The term Disability Justice was coined in 2005 through conversations between Patty Berne, Mia Mingus & and the late Stacy Milber.⁹ Disability Justice seeks to respond to the fact that Disability

Rights Movement and Studies often fail to recognize intersecting experiences within our communities such as those of “disabled people of colour, immigrants with disabilities, queer people with disabilities, queers with disabilities, trans and gender non-conforming people with disabilities....” add layers of complexity to the experiences and needs of students with disabilities.¹⁰ Disability Justice urges us to meaningfully incorporate these experiences into disability work, especially within Higher Education.

⁹ Project LETS, <https://www.letserasethestigma.com/disability-justice>

¹⁰ Ibid

1.0 Recommendations

Before we present our recommendations, we want to emphasize the importance of Concordia engaging in meaningful paid collaboration with disabled students before a revised policy is implemented. It is necessary that disabled Black students, Indigenous students, and Students of Colour (Hereafter, BIPOC) are not only at the table but hold an integral part of any disability work done on campus.

¹¹An example can be found in Brock Univeristy's Accessibility Policy

¹²Brock University Accessibility (AODA) Policy, [page 1 can be found here](#).

Commitment to policy revision

A policy is only effective if it responds to the continuously evolving environment that affects accessibility. Therefore, our first recommendation is:

1 That the Access Policy is revised every five years through;

1.1 Establishing an ongoing committee of students, faculty, and staff with disabilities that meaningfully represents the many intersections of lived experiences people with disabilities have.

1.2 Clearly articulating within the policy who is responsible to do a review and what accountability mechanisms are in place should the University not adhere to its own commitment.

1.3 Publicly documenting where policy reviews and committee meeting minutes will be uploaded to that is accessible to the Concordia community.

1.4 Specifying the revision history dates and next review date within the policy¹¹

1.5 A commitment to meaningful involvement of non-institutional parties in the review process (i.e. off campus disability groups).

1.6 An outline of how BIPOC students with disabilities will be intentionally recruited to participate and in defining what this inclusion looks like

1.1 Scope & Purpose

To begin, we reviewed Concordia's current Access Policy's purpose and scope statements. We consider these the guiding principles of an Accessibility policy given that these are the first commitments we read that articulate

who is responsible to meet standards of accessibility at Concordia and how the policy is applied within different contexts. Through our policy scan, we concluded that Brock University's Accessibility Policy provides the most comprehensive example of a purpose statement and scope. This is clear when compared to Concordia's current Access Policy scope and purpose as seen below:

Brock's Policy Purpose

"The purpose of this policy is to outline the commitment of Brock University (the "University") in promoting accessibility, equal participation and inclusion as an inherent right of persons with disabilities by implementing the requirements of the Accessibility for Ontarians with Disabilities Act, S.O. 2005, c. 11 ("AODA") and its regulations: Integrated Accessibility Standards, O. Reg. 191/11("IASR")"

Brock's Policy Scope

"This policy applies to all University employees, faculty, volunteers, students or others who are responsible for delivering goods, services or facilities. This policy applies to the University's efforts to remove barriers to participation among persons with disabilities, including attitudinal, communication, physical, policy, programmatic, social, and transportation, towards creating an inclusive environment for all Brock Community members."¹²

Concordia's Access policy Purpose

"The purpose of this policy is to outline the respective roles and responsibilities of the University and of students with disabilities with respect to accessibility to the academic programs and physical facilities of the University."

Concordia's Access policy's Scope

"This policy covers the treatment of all students with disabilities."

Concordia's Access Policy's purpose advises that the policy stipulates the "roles and responsibilities." However, the stakeholders who create the Concordia community and have responsibilities to uphold accessibility are not explicitly named. This current format does not create accountability nor provide clarity concerning the roles of the many departments and individuals who

make up "The University". Furthermore, homogenizing "The University" as one entity yet naming "students with disabilities" as a separate responsible party, creates a visible gap concerning the roles for students without disabilities. Within this context, "The University" could be interpreted as a term only being applied to paid staff of Concordia.

Therefore it is recommended:

- 1 That Concordia's Access Policy's purpose & scope is updated to clarify the commitments the University is making to Accessibility and who is responsible by;
 - 1.1 Naming the stakeholders including service providers, faculty, volunteers, transportation services, students and/or anyone who is responsible for providing goods and services.
 - 1.2 As modeled within [Brock University's Access Policy](#), identifying the specific barriers that Concordia commits to removing, including, but not limited to, attitudinal, communication/information, infrastructural/physical, and systemic barriers currently present within the University environment.
 - 1.3 Expanding on what equitable treatment of disabled students means under the definitions of the policy.

¹²Brock University Accessibility (AODA) Policy, page 1 can be found [here](#).

2.0 Definitions

Definitions within Disabled communities are in constant flux and have evolved and resisted a long history of pathologizing rhetoric. Though we are committed to disabled people defining their own identities, we understand that the accommodations process within Higher Education is regulated by the government and connected to a medical diagnosis of disability. Our below recommendations have worked to keep this in mind.

2.1 Definition of Disability

Within its Student Accessibility Policy, Concordia currently uses the following definition for disability;

*“A student with a disability” means a student who 1) has a physical or mental impairment or a learning disability that substantially limits one or more major life activities; and 2) has a history or record of such an impairment. Examples of recognized disabilities include, but are not limited to, **blindness, deafness, paralysis, cystic fibrosis, lupus, multiple sclerosis, mental illness, HIV/AIDS and specific learning disabilities including Attention Deficit Hyperactivity Disorder (ADHD).**”¹³*

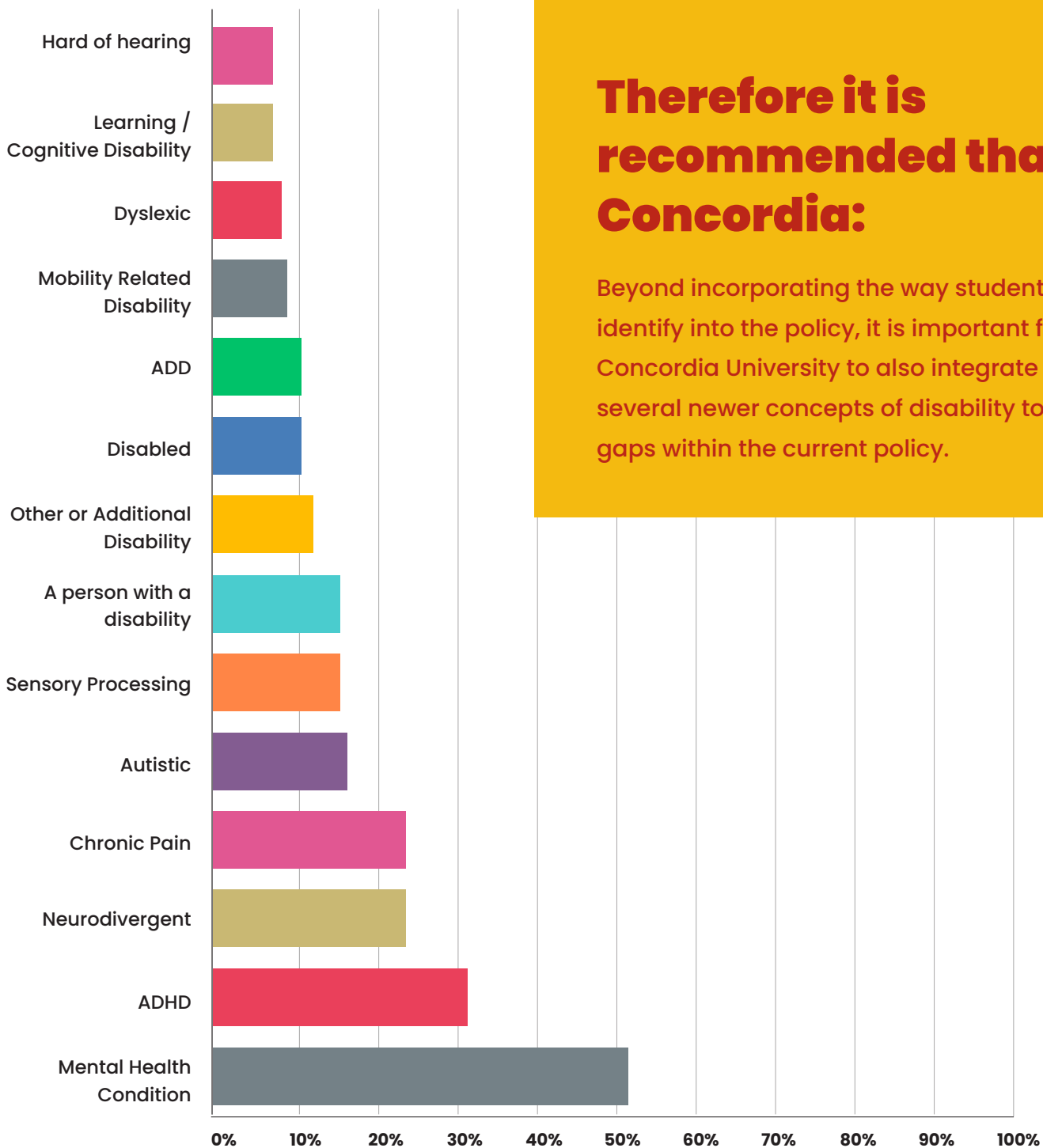
“Learning disabilities” refer to a number of disorders which may affect the acquisition, organization, retention, understanding or use of verbal or non-verbal information. These disorders affect learning in individuals who otherwise demonstrate at least average abilities essential for thinking and/or reasoning. As such, learning disabilities are distinct from global intellectual deficiency.”¹⁴

It is important for definitions of disability to resonate with communities and individuals that the policy is here to serve. Within our survey, 50% of all student respondents identified as having a disability 51% identifying as having a mental health condition, 31% with ADHD, and 24% as Neurodivergent.¹⁵ For further demographic information, please review the Mapping Project report in full.

¹³ Concordia, Accessibility Policy, page 1–2

¹⁴ Concordia, Accessibility Policy, page 2

¹⁵ Gift Tshuma and Shayna Hadley, The Mapping Project, Centre for Gender Advocacy, Concordia University, 2020.



Therefore it is recommended that Concordia:

Beyond incorporating the way students identify into the policy, it is important for Concordia University to also integrate several newer concepts of disability to fill gaps within the current policy.

¹⁶ Thomas Armstrong, *The Power of Neurodiversity Unleashing the Advantages of Your Differently Wired Brain* (Cambridge, MA: Da Capo Lifelong, 2011).

¹⁷ NEADS. *Enhancing Accessibility in Post-Secondary Education Institutions: A Guide for Disability Service Providers*. PDF file. (March 2012), p 5, https://www.neads.ca/en/norc/eag/eag_en.pdf

¹⁸ Brock University, *Accessibility (AODA) Policy*, section 3, pg 1-2. which can be found by clicking [here](#).

1 Incorporate the terminology of Neurodiversity into the disability definition and the policy's understanding of learning disabilities (LDs). It is important to also acknowledge that many people with LDs, as well as some with developmental disabilities such as Autism, prefer to define their disability under the umbrella term of Neurodiversity. One example of a definition of Neurodiversity that could be drawn from being:

"The term neurodiversity refers to variation in the human brain regarding sociability, learning, attention, mood and other mental functions in a non-pathological sense." 16

2 Add a recognition that episodic or intermittent disabilities.

3 Recognition that students with invisible / hidden disabilities face specific barriers in postsecondary institutions.

4 As Disability is a multifaceted and complex experience, it is important that postsecondary institutions acknowledge the need for flexible solutions to inaccessibility and accommodations.¹⁷

4.1 One example to draw from is Brock University's Accessibility AODA Policy where they state a commitment to "ensuring the University will make efforts to view disability as a flexible concept that is impacted by social Accessibility Policy and environmental barriers that prevent full participation"¹⁸

5 Clarify the inclusion of HIV/ AIDS within the definition of disability and the type of accommodations provided to students living with HIV/ AIDS. In review of this it was assumed that there was a connection to the side effects of ART drugs.

2.2 Defining Ableism & Disablism

While Ableism, is the most common way to refer to disability-related oppression, there have been many conversations within disability communities and scholarship surrounding the use of Disablism as an alternative framework.

In his 2018 book *Academic Ableism*, scholar Jay T. Dolmage articulates that,

“Higher Education employs logics of both ableism as well as disablism. He goes on to explain that “[d]isablism constructs disability as negative quite directly and literally. [while] Ableism renders disability as abject, invisible, disposable, less than human, while able-bodiedness is represented as at once ideal, normal, and the mean or default.”

Within other discourse, some suggest that we stop solely using the framework of Ableism and have chosen to switch to using Disablism discourse. A.J. Withers, a prominent Disabled, Queer and Trans activist and scholar posits this change is needed because:

“Ableism makes it really easy for people to equate ableism with discrimination based on ability. This is a very problematic association ... Many people can be disabled and able-bodied at the same time as there are a number of different aspects of disability, not solely physical disability. We all have able bodies ... The opposite of disabled is not able-bodied, it is non-disabled.”

While we feel it is important to highlight some of this discourse, we do not feel equipped to recommend the use of one definition above the other because of its debated nature within our communities. However, we do believe it is important that the University include at least one in its policy. Within its Student Accessibility Policy, Concordia currently uses the following definition for disability;

¹⁹ Jay Dolmage, *Academic Ableism: Disability and Higher Education* (Ann Arbor, MI: University of Michigan Press, 2017), pp. 6-7.

²⁰ A.J. Withers, “Disablism or Ableism?,” Stillmyrevolution (blog), January 1, 2013, <https://stillmyrevolution.org/2013/01/01/disablism-or-ableism/>

²¹ “Terminologies of Oppression.” The Anti-Oppression Network, March 10, 2018.

Therefore, we recommend consideration of the following:

- 1** Any definition chosen does not focus solely on the discrimination of “major functional disabilities” (e.g. “visible” and physical) but instead casts light on the discrimination Neurodivergent, chronically ill, and people with mental health conditions face.
- 2** That it demonstrates how Ableism / Disablism is inextricably interlinked to other forms of oppression including but not limited to racism, sexism, ageism, classism, cisheteropatriarchy, ethnocentrism etc.²¹
- 3** Provides examples of behaviours that are ableist including paternalistic, patronizing, and dismissive attitudes towards disabled people.

As ableism is still the prominent term used in North America, we will close this section by providing one example of an institutionalized definition of Ableism by the AODA alongside two from organizations by people with disabilities:

AODA

“[Ableism] may be defined as a belief system, analogous to racism, sexism or ageism, that sees persons with disabilities as being less worthy of respect and consideration, less able to contribute and participate, or of less inherent value than others. Ableism may be conscious or unconscious and may be embedded in institutions, systems or the broader culture of a society. It can limit the opportunities of persons with disabilities and reduce their inclusion in the life of their communities. Ableist attitudes are often based on the view that disability is an “anomaly to normalcy,” rather than an inherent and expected variation in the human condition. Ableism may also be expressed in ongoing paternalistic and patronizing behavior toward people with disabilities”²²

²² [Ontario Human Rights Commission \(OHRC\), Policy on ableism and discrimination based on disability. PDF file. June 27, 2016, pp 3.](#)

²³ [Stacey Milbern and Patty Berne, “Ableism Is the Bane of My Motherfuckin’ Existence,” Sins Invalid \(May 12, 2017\)](#)

²⁴ [Michelle R Nario-Redmond, “Ableism: The Causes and Consequences of Disability Prejudice,” Disability Visibility Project, November 27, 2019,](#)

Sins Invalid

“Ableism functions as a dehumanizing system that favors able-bodied people at the expense of people with disabilities, producing barriers from internalized ableism and shame, to interpersonal conflicts between non-disabled people and people with disabilities, lack of access to education, employment, and housing, social control imposed through the medical-industrial complex and criminalization, and the severe isolation caused by institutionalization and incarceration.”²³

Disability Visibility Network – Alice Wong

“I prefer a simple definition as the prejudice and discrimination toward individuals and groups simply because they are disabled. Similar to definitions of prejudice more broadly, the ABC’s of ableism include our Affective, emotional and attitudinal reactions; the Behaviors, actions, practices and policies that discriminate, and the Cognitive beliefs, stereotypes and ideologies that go beyond general negativity.”²⁴

3.0 Recognition of intersecting identities and experiences

Becoming more popular within universities approaches to Equity Diversity and Inclusion (EDI) work and policies, the term Intersectionality is often used to refer to the application of an analysis that works to understand that people navigate multiple forms of systemic oppression dependent on their social position²⁵ (i.e. if they are racialized and disabled). Coined in 1989 by Black feminist lawyer, and Civil Rights advocate Kimberlé Crenshaw. The framework of intersectionality has been used by many disability scholars, organizers, and activists, and is a fundamental framework in Disability Justice.

Currently Concordia's Access Policy does not mention how access and barriers affect students differently because of their interactions with other forms of oppression. Given the breadth of this project and the continued work that needs to be done at Concordia to challenge structural inequity, we

cannot offer one solution. However, a commitment to intersectionality within further accessibility work is imperative, especially because Concordia University's recent EDI ²⁶ recommendations do not touch on any intersectional experiences of Students with Disabilities.

Through our policy scan, we found that many universities mentioned intersectionality but did not concretely outline the steps they take to remove barriers for Disabled Students with overlapping identities. Any policy statement committing to an intersectional approach to accessibility needs to be attached to the concrete application, or it's' simply an affirmation of values.

²⁵ [“What Is Intersectionality, and What Does It Have to Do with Me?” YW Boston, July 2, 2020.](#)

Below are questions we posit to assist in informing a more inclusive approach to accessibility on campus:

1. How is Concordia University acknowledging and removing barriers that BIPOC Students with Disabilities experience?
2. What other policies within the University are connected to the Student Accessibility Policy (e.g. The Policy on Sexual Violence, The Rights and Responsibilities²⁷) and are the processes outlined within them accessible and related to the needs of BIPOC students?
3. Who guides hiring practices to ensure that Concordia University is addressing the well-known gap of BIPOC staff and faculty in Higher Education? What is the current university-wide commitment to this? Is it meaningful? Who currently defines this process as collaborative, how are they directly connected to the needs and lived experiences of BIPOC academic and non-academic communities and individuals?
4. What are the ways campus services do not take into account the unique experiences of BIPOC students with disabilities?
5. How are Women of Colour with disabilities a part of decision-making processes within the University?
6. How does the current and historical colonial context of the institution impact accessibility practices and affect Indigenous students?
7. Does the University have an understanding of how Indigenous communities understand and conceptualize disability?

Continued on next page



8. How are Two-Spirit students with disabilities included in the decision-making processes?
9. What is the relationship of the Access Center for Students with Disabilities (Hereafter ACSD) to the Aboriginal Resource Centre and Indigenous Directions at Concordia? Does it directly inform what and how Indigenous students with disabilities access supports?
10. How can queer, trans, Black, Indigenous, People of Color (Hereafter, QTBIPOC) with disabilities be supported within the institution?
11. What are the services and workshops that can be developed by and for disabled QTBIPOC students?
12. How does the policy and EDI work of the University address the needs of queer and trans students with disabilities and/or mental health conditions?
13. What is the ACSD's connection to student groups that serve queer, transgender, gender non-conforming, and non-binary students? Can they be stronger?
14. What are the links between the ACSD and the International Students Office? Can they be stronger?
15. How does citizenship affect Students with Disabilities accessing services?

4.0 Confidentiality

We understand that the ACSD prioritizes student confidentiality. However, how confidentiality is upheld goes unmentioned within Concordia's Access Policy. This is important to rectify as confidentiality statements help establish trust between the student and the office, whenever disclosure

or handling of medical documentation is involved. To our knowledge, Concordia's ACSD does not currently outline confidentiality requirements on their website unlike other services within Concordia (e.g. Health Services.)²⁸

Therefore it is recommended that;

- 1** Adding a section illustrating the University's commitment and legal requirements concerning confidentiality where it concerns students with disabilities by:
 - 1.1** Outlining how confidentiality will be carried out within the ACSD (i.e. how documents are secured and information on whether a disclosure is done on a need-to-know basis).
 - 1.2** Outlining other University stakeholders' responsibility to uphold confidentiality.
 - 1.3** Clearly specify confidentiality as per the policy's relationship to Federal and Provincial policies by naming those policies and their implication.

The above section extrapolates from both Ryerson University Accessibility policy and University of British Columbia's (UBC)

²⁸ "Confidentiality," Concordia University, n.d., <http://www.concordia.ca/students/health/confidentiality.html>

5.0 Responsibilities & Accountability

Throughout their time at Concordia, Students with Disabilities interact with many different stakeholders (classmates, Faculty, service Staff, volunteers, Resident Assistants, Teaching Assistants, etc.) and can encounter barriers in all aspects of academic life. Given this, it is important that each stakeholder knows their role in promoting accessibility and removing barriers for Students with Disabilities.

5.1 Roles and Responsibilities for the Concordia Community

Upon revision of the Access Policy, attending to institutional accountability and defining stakeholder's roles and responsibilities must be prioritized. To contextualize, the current policy outlines the University's responsibilities in the below format:

The University acknowledges that qualified students with disabilities have a right, subject to the University's capacity to respond to the request and the University's financial and other resource constraints, to:

a. full access to all educational programs of the University;

b. full access to the educational process and learning environment (including but not limited to, classes, laboratories, and libraries)

c. full access to the University campuses

d. full access to University facilities and services. ²⁹

²⁹ Concordia. Accessibility Policy, page 2.

As full access is not defined within the policy, it could be widely interpreted. A lack of stakeholder recognition creates barriers for Students with Disabilities as it is unclear who is responsible to address challenges they experience, albeit informational, structural, attitudinal etc. It is not sustainable to rely solely on the ACSD to address every barrier as they are found throughout all facets of University life. Everyone has a part to play in ensuring accessibility is addressed comprehensively.

Through the Mapping Project, we have identified that many of the access barriers that Concordia students face are within the classroom environment.³⁰ This means that particular attention needs to be paid to articulating the responsibilities of Deans, Department Chairs, and Professors in creating barrier-free classrooms.

³⁰ The Mapping Project, 2020.

Therefore it is recommended that;

1 That Concordia University amends its section of Responsibilities within its Access Policy to;

1.1 Outline specific roles and responsibilities along with accountability mechanisms (e.g. how feedback from Disabled Students is received) for but not limited to:

Department Chair / Director /
Principle
Deans
Learning & Teaching Office
Professors
Registrar

Support Staff
Students
Student Services
Student fee-levy groups
Transportation services

We recommend reviewing Ryerson University Accessibility Policy, pages 2-11, for a reference to how this has been outlined within another Canadian university.

5.2 Commitment to Physical Accessibility

There are at least six buildings on Mackay and Bishop street on the Concordia SGW campus that are known for their inaccessibility. This includes student spaces, classrooms, and departmental spaces. Through years of community conversation, we know anecdotally that Disabled Students with physical disabilities (especially those who use mobility devices) have chosen their programs at Concordia based on physical accessibility. For example, students who are wheelchair users may avoid Women Studies because the departmental library and professor offices are in a building that has no ramp or elevator.

While departments have made efforts to accommodate students by moving classrooms, or by meeting students outside of the departmental building, this inaccessibility creates many obstacles to navigate and promotes the exclusion of Disabled Students from these programs and services.

While understanding the difficulty of changing physically inaccessible spaces, we recommend Concordia acknowledge this inaccessibility and commit to barrier-free access through publishing an action plan, within the next 2 years, that demonstrates this commitment

6.0 Admissions and Practicums

Currently, the Concordia Access Policy does not outline how the admissions and practicum process adapts to preemptively reduce barriers for Students with Disabilities. Though we recognize that Concordia University is certainly offering accommodations for potential students and current students doing practicums, what is offered is unclear. The accommodations available need to be summarized in the policy to create accountability and transparency within the University, as well as clarity for students needing these accommodations. Additionally, having a preemptive approach to offering these accommodations shows potential students that Concordia is committed to meeting their accessibility needs.

The policy be updated with the ways in which non-academic accommodations also extend to potential students by;

- 1.1** Advising potential students on how to provide advanced notice of accommodation they require in order to fully submit their application or meet any interview requirements.
- 1.2** Clearly outline which stakeholders are responsible to carry out these accommodations.
- 1.3** List the alternative formats of application process available (i.e. Braille, Large print, formatting into an accessible font such as OpenDyslexic ³¹, audio recording, etc.
- 1.4** Provide assistance in the form of a scribe, depending on the barrier the student may be facing.

6.1 Practicum Accommodations

Undergraduate and graduate students at Concordia University are involved in a variety of placements depending on the program that is often fulfilled outside of the University. Although it is not mentioned as an accommodation on the ACSD website, we know that they provide accommodations for field placements. In order to ensure students with disabilities can advocate for themselves and know the boundaries of accommodation within field placements, it is recommended that:

- 1.1 Concordia adds a section within their Access Policy that clearly outlines how placement accommodations are conducted and which parties are involved throughout the process. In addition, the responsibilities of each stakeholder, including the student, must be outlined.
- 1.2 This section should also be added to the ACSD website so students who know their degree will require a placement can make informed decisions.
- 1.3 The section stipulates that the University is responsible for ensuring the field placement can accommodate the student before assigning them to a specific placement.

Currently, out of the universities we reviewed, only Ryerson University mentions accommodation for field placements as shown below:

“Ensure that field placements/practicums are informed of, and able to respond to, accommodation requirements of students with disabilities prior to assigning students to a specific placement setting”³²

³¹ Open Dyslexic: A typeface for Dyslexia, <https://opendyslexic.org/>

³² Ryerson University, Academic Accommodation of Students with Disabilities. PDF file. (September 1, 2016): p. 7, <https://www.ryerson.ca/senate/policies/pol159.pdf>.

7.0 Self Advocacy

7.1 Responsibility to self-advocate

Within Concordia's Access policy, Disabilities ³³, it states that students are “expected to undertake a reasonable measure of self-advocacy”. However, neither self-advocacy nor what is considered a reasonable measure is further defined. As certain accountability mechanisms are missing from the policy (e.g. stakeholder responsibilities, an appeals process, and an outline of how training is undertaken for staff and faculty) the current requirement for students to self-advocate creates further barriers for Disabled Students. We know from our research that Students with Disabilities are currently self-advocating and are often met with dismissive or belittling attitudes from professors. ³⁴

Furthermore, none of the university Access policies we scanned mention self-advocacy.

Therefore it is recommended that;

- 1.1** If the reference to self-advocacy is included in a policy revision then the University needs to clearly define “reasonable self-advocacy.”
- 1.2** That it is tied to university stakeholder responsibilities, a commitment to accessibility training, and an appeals/grievance process is clearly outlined within the policy.
- 1.3** It is recognized that attempts to self-advocate can be interrupted by racism and biased attitudes and that there is an outlined process to escalate this issue in a student-centered manner.
- 1.4** Whether or not self-advocacy is carried into policy revisions, that the ACSD commits to the creation of and distribution of practical tools for disclosure.

³³ Concordia, Accessibility Policy, page 4.

³⁴ The Mapping Project, 2020.

³⁵ Concordia University. Report of the Advisory Group on Equity, Diversity and Inclusion. PDF file. (September 30, 2019), p. 10, <https://www.concordia.ca/content/dam/concordia/offices/provost/docs/Report-Advisory-Group-Equity-Diversity-Inclusion.pdf>

8.0 Training

Currently, the Concordia Access Policy does not stipulate how staff, faculty, and students are trained concerning accessibility and the rights of disabled students. However, as noted in Concordia's EDI report,

“There is also training needed related to supporting and accommodating students and employees with disabilities. Specific training on designing approaches that are more inclusive at all levels of the university is needed.”³⁵

Comprehensive training is an integral part of creating a safer and more accessible learning environment for disabled students as without proper support and unified understanding of accessibility, faculty, and staff are creating barriers for disabled students.

Within our survey, we asked students to select all areas they would like professors to receive more training concerning accessibility and they provided the following answers:

70% “accommodating students with extensions when lateness is disability-related”

66% “teaching methods that are more accessible to students who are neurodivergent”

65% “Understanding the accommodations process at the Accessibility Centre”

53% “Adaptive technology (i.e. how screen readers are used, etc.)”

50% “Teaching methods for students who have mobility-related disabilities”

40% “Not shaming students for being disabled”

Based on the NEADS assessment and the above results from students, we recommend that the Access Policy mandates the following³⁶:

1 Training and information seminars on disability with a focus on information regarding the most current issues affecting students with disabilities that;

1.1

Prioritize facilitators from disabled communities.

1.2

Ensure that bodies involved in the training process are cognizant of attitudinal and systemic barriers that extend their reach beyond the pre-existing policies.

1.3

Are accessible in their facilitation (i.e. go beyond lecture format).

³⁶ NEADS. Enhancing Accessibility in Post-Secondary Education Institutions: A Guide for Disability Service Providers. PDF file. (March 2012), p 34-36, https://www.neads.ca/en/norc/eag/eag_en.pdf

2 Create accessible documentation and guidelines for faculty members that go beyond traditional accommodations, such as exam time and test accommodations by;

Defining Ableism & Disablism

Outlining what different barriers looks like within the pedagogical environment, with a specific focus on attitudinal barriers.

Explaining hidden / invisible disabilities.

Providing measures through which neurodivergent students can be supported.

Providing ways in which faculty can adapt and be flexible in order to meet the diverse needs of disabled students.

Outlining how disability affects students differently based on their social location.

Outlining how racism and other forms of discrimination impact how a student with a disability will be treated.

Providing resources on and off campus for disabled students.

Outlining how to respond to a disclosure of disability.

Outlining how to use adaptive technology.

Providing contact information to resolve technological issues after ACSD hours.

Outlining how to accommodate students with disabilities during an evacuation.

2.1 Development of checklists and resources on disability accommodations procedures, universal design for accessible lectures, creation of accessible materials and ensuring their availability in online faculty spaces.

3 Update these areas of priority periodically to ensure they continuously respond to the needs of students and that the barriers they encounter are effectively addressed and minimized.

9.0 Student Appeals

From our interviews with Disabled Students, we learned that one of the most frustrating barriers at Concordia was the lack of transparent information.³⁷ This was particularly true for students who needed additional support from the ACSD or clarity surrounding their rights if accommodations provided were not adequate in addressing their barriers. As Concordia has many offices that process complaints, a clearer process is needed. If these requests are facilitated through the Office of Rights and Responsibilities, the Ombuds, or a student group such as the CSU Advocacy Centre, those details must be incorporated within the policy.

Out of the universities we scanned, only the University of British Columbia's Accessibility Policy³⁸ outlines a comprehensive appeals process within their policy. Ryerson University has a less extensive section concerning appeals, but does outline a resolutions process within their policy³⁹. However, Carleton University⁴⁰ and the University of Manitoba⁴¹ have separate appeal process for students with disabilities.

To build further transparency into the accommodations practices of the University, it is recommended that:

³⁷ The Mapping Project, 2020.

³⁸ University of British Columbia. Accommodation for Students with Disabilities. PDF file. July 2019, https://universitycounsel-2015.sites.olt.ubc.ca/files/2019/08/Disability-Accommodation-Policy_LR7.pdf?file=2019/02/policy73.pdf

³⁹ Ryerson, Academic Accommodations, pages 8-9.

⁴⁰ "Student Academic Accommodations Appeal Committee", Carleton University, n.d. <https://carleton.ca/senate/standing-committees/academic-accommodations-appeal/>

⁴¹ "Senate Committee on Academic Accommodation Appeals", University of Manitoba, September, 2018, https://umanitoba.ca/admin/governance/governing_documents/governance/sen_committees/scaaap.html

- 1** A section discussing student appeals is added to the policy that clearly outlines the students' rights and;
 - 1.1** Outlines who to contact and details if this change is dependent on the type of appeal.
 - 1.2** Outlines the specific examples where the University cannot process an appeal.
 - 1.3** Clearly outlines the different stages of the appeal process.
 - 1.4** Outlines specific stakeholder roles throughout the appeals process, clearly indicating timeframes for each stage of the process.
 - 1.5** Specifies what a student must provide in their appeal and offers accommodation in the form of scribes or alternative methods for submitting where required.
 - 1.6** Outlines a student's options for accommodation while they await a decision.
 - 1.7** Provides outside resources for students whose appeal is denied or where the results do not meet their needs.
 - 1.8** Outline how Concordia will work to ensure the process is barrier-free for all students.

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