



Ontario Confederation of University Faculty Associations
Union des associations des professeurs des universités de l'Ontario

OCUFA response to the initial recommendations for the development of proposed postsecondary accessibility standards

To the Postsecondary Education Standards Development Committee:

On behalf of over 17,000 full-time and contract university faculty and academic librarians, OCUFA is writing to provide feedback on the committee's recommendations for postsecondary accessibility standards. OCUFA welcomes the committee's report and views it as a step in the right direction towards a more accessible postsecondary education system in Ontario. OCUFA also welcomes the principles of intersectionality, shared responsibility, and proactive accessibility efforts that have framed and informed its development.

OCUFA has long advocated for an accessible higher education system in the province. Addressing the longstanding barriers to accessibility for students, staff and community members is long overdue and a priority for OCUFA's 17,000 members.

While OCUFA is pleased with the report including its vision for postsecondary education, its recommendations, and its foregrounding of disabled persons lived experiences, we write to share some concerns and gaps in recommendations as well as suggestions for improvement. OCUFA's feedback was developed in consultation with faculty and academic librarians, both full-time and contract.

Summary of recommendations

OCUFA recommends that the committee:

- Emphasize the need for adequate and stable government funding of postsecondary education as a requirement for the implementation of new accessibility standards under AODA regulations.
- Highlight the need for smaller class sizes to facilitate meeting the accommodation needs of students.
- Recognize that the expedited implementation timelines in the report will require adequate government funding and resources to ensure the successful rollout of the various initiatives. Without appropriate funding, this work will be downloaded, and faculty will take away from other student-centred work.
- Require the inclusion of student and labour union representatives in the development of resources, tools, criteria and plans at the institutional and governmental levels.

- Acknowledge the challenges facing contract faculty and academic librarians and emphasize the need for adequate public funding to address precarious academic labour on campus as a first step towards improving accessibility at Ontario's campuses.
- Recognize that the work of creating accessible new courses, or "retrofitting" existing courses is very time consuming if done properly. All faculty, including contract faculty and academic librarians, must be appropriately compensated for this work. Without appropriate funding for universities, this work will be downloaded onto faculty and will take away from other student-centred work.
- Recommend the development of adequate accountability measures for evaluating an institution's compliance with accessibility standards. Compliance must not rely on student evaluations which are informative but were never intended for the purpose of evaluating compliance with accessibility standards.
- Recommend that the regulations provide guidelines with accountability measures, not templates, for accessible course and program design that would permit institutions to adapt them to their unique course needs.
- Recommend that the training modules be regularly updated to reflect best practices and provide compensation for the trainings particularly for groups such as contract faculty and academic librarians who do not get paid for their service or required training.
- Recognize and account for additional supports for faculty and staff at postsecondary institutions who face accessibility challenges themselves.
- Emphasize mental health disabilities and accommodations in the report and recommendations.

Funding

The committee's report acknowledges that the proposed recommendations bring "additional responsibility for an already overburdened system." In order for accessibility standards at postsecondary institutions to have a chance at succeeding, the system needs to be unburdened through direct, sustainable government investment as a first step. Additional government resources must be provided to support the development and implementation of the important accessibility measures outlined in the report.

Ontario's postsecondary institutions are chronically underfunded. The province has the lowest level of per-student funding in Canada and is 37 per cent behind the rest of the country. This has had several predictable effects on the quality and accessibility of education. To make up for low levels of per-student public funding, postsecondary tuition fees have been allowed to increase. For years now, Ontario has consistently had amongst the highest tuition fees in Canada for domestic students at the undergraduate and graduate levels, and the highest tuition fees in Canada – by far – for international students. Since 2014-15, tuition fees have made up more than half of Ontario universities' operating revenue. The continued shift in

Ontario towards funding individual students rather than the system as a whole undermines the quality and accessibility of higher education and can drive universities towards short-term, cost-saving measures.

Further, full-time faculty hiring has not kept pace with student enrolment. In the last decade, full-time student enrollment increased by over 25 per cent. Over the same period, the number of full-time faculty employed at Ontario's universities increased by only 2.6 per cent. This means that since 2008-09, student enrollment has increased at a rate that is almost nine times that of faculty hiring.

As a result, Ontario currently has the highest student-faculty ratio in the country, with 32 students per faculty member, compared to the average for the rest of the country which is 21 students per faculty member. These troubling trends of dwindling funding levels, growing student to faculty ratios and larger class sizes have had a negative impact on accessibility for students and faculty. They have undoubtedly created additional barriers for students. Addressing the chronic underfunding of public universities and skyrocketing tuition fees, which disproportionately impact marginalized students, including disabled students, is a necessary step in creating accessible campuses.

In addition to addressing the underfunding of postsecondary institutions in the province, several of the proposed structural changes and initiatives in the report require dedicated funding and infrastructure. Without addressing postsecondary institutions' chronic underfunding and providing additional funding to facilitate the report's recommendations, the report's recommendations will be set-up for failure.

A lack of adequate supporting funding and resources risks downloading the responsibility for implementing this ambitious vision and recommendations onto faculty who are already overburdened given the high student-to-faculty ratios in Ontario and already carry significant responsibility for meeting student accessibility needs.

OCUFA recommends that the committee emphasize the need for adequate and stable government funding of postsecondary education as a requirement for the implementation of new accessibility standards under AODA regulations. It is imperative that the government ensure that this funding is centralized to ensure it is distributed equitably within institutions.

We note that while new software and training will be effective in improving accessibility at postsecondary institutions, this is not a substitute for addressing the shortage of faculty and staff support at Ontario's universities.

Increasing class sizes as a barrier

As a result of the chronic underfunding of Ontario's universities, class sizes have seen a considerable increase over the past 10 years and will continue to rise without new funds to support full-time tenure-stream faculty hiring.

The latest data on class sizes from Common University Data Ontario (CUDO) show that the number of courses with 30 students or less at Ontario universities was 14 per cent lower in

2017, the last year of available data, than it was in 2007. By comparison, over the same period, the number of courses with 250 students or more rose by a stark 25 per cent.

Larger class sizes mean less one-on-one engagement, and fewer opportunities for mentorship, direct communication and academic advising for students.

Growing class sizes also limit the capacity of instructors to provide accommodations. If, for example, 14 per cent of students ask for accommodation, meeting the students' needs for a professor teaching a 30-student class is vastly different than a class of 300 students. Exacerbating the situation is the fact that faculty, students, and university administrations report a dramatic increase in the number of students requiring mental health related accommodations.

Faculty members and academic librarians, contract and tenured alike, would emphasize for the committee that meeting students' accommodation needs is not the problem. The problem is the lack of supports provided to faculty members to be able to meet those needs, including institutional supports. By their very nature, many accommodation requests must be individually tailored to student needs. Growing class sizes make individual mentorship or accommodation vastly more difficult to achieve.

OCUFA views the underfunding of Ontario's universities to be an accessibility issue and urges the committee to call for the adequate funding of Ontario's universities to provide students with the supports they need, decrease class sizes, and decrease the student-to-faculty ratio.

Implementation timelines

OCUFA welcomes the ambitious implementation timelines outlined in the report and shares the committee's urgency in improving accessibility at Ontario's postsecondary institutions. However, as noted in the previous sections, the expedited timelines need to be accompanied by adequate government funding and resources. It is OCUFA's view that this funding is essential for successfully rolling out the recommendations and changes outlined in the report within the suggested timelines.

Not providing adequate funding to support implementing the report's recommendations will inevitably jeopardize its success and the sustainability of its implementation. Further, a lack of funding risks downloading the responsibility of meeting the report's recommendations onto already overburdened faculty members, which will disproportionately be felt by faculty and staff with access needs. Failure to appropriately fund this initiative will put an already fragile system closer to the breaking point.

Inclusion of unions and campus groups

As noted in the principles guiding the report, accessibility is a shared responsibility. It is of utmost importance that all student and labour unions on campus be meaningfully included in the design, development and implementation phases at every institution. It is also critical that any new initiatives, particularly those with academic implications, follow a collegial governance process that allows for the meaningful and continued involvement of campus groups. As such, we recommend that the report require the inclusion of student and labour union representatives both in recommendation 14 as well as in all other relevant

recommendations regarding the development of resources, tools, criteria, and plans. Similarly, provincial student and labour groups must be included in all resource and policy development at the government level.

Challenges for contract faculty and academic librarians

As outlined in the funding section, full-time faculty hiring has stagnated at Ontario's universities while the reliance on contract faculty has increased at an alarming rate. The use of contract faculty has become an entrenched strategy to reduce costs in universities across the province. Over half of university courses in Ontario are now taught by precariously employed contract academics. These contract faculty lack job security and must apply for their jobs every year and in many instances every academic term. Contract faculty usually receive their contracts only weeks before the start of the term, and their contracts end days after the end of the formal academic term, which gives little time for course design let alone incorporating accessibility measures, and often no monetary compensation for this work.

Many contract faculty also teach on multiple campuses and their contracts often do not provide for compensation or hours for course preparation, or for accommodation requests that may require them to work past their contract date.

It is also important to note that according to research, the majority of contract faculty are women and racialized faculty are overrepresented in contract positions, making fairness for contract faculty an issue of equity.

Under these circumstances, where the majority of Ontario's courses are taught by contract faculty members who receive their course assignments shortly before the start of class, it is nearly impossible to implement many of the report's recommendations, particularly those regarding teaching and learning. As the committee has identified in the report, creating accessible courses and course materials and accommodating students' diverse needs requires time and careful preparation and consideration.

While contract faculty and academic librarians are keen to contribute to improving accessibility on campus, they receive course assignments mere weeks before a course starts. This limits their capacity and puts them at a disadvantage in terms of being able to proactively incorporate accessibility measures in their courses, through universal design or otherwise.

In effect, teaching on contract is an accessibility issue, both for students and faculty. It does not afford faculty members, especially those on contract, the necessary supports to incorporate accessibility standards in courses in advance. The fact that the majority of courses in Ontario are taught by contract faculty puts into question the feasibility of implementing the committee's recommendations without addressing precarious academic labour at Ontario's campuses. Providing job security and proper compensation for contract faculty and academic librarians is an essential step towards tackling inaccessibility at Ontario's postsecondary institutions.

OCUFA strongly recommends that the committee emphasize the need for adequate public funding including to address precarious academic labour on campus as a need for

accessibility. It is OCUFA's view that not doing so jeopardizes the recommendations' potential for success.

Reliance on student evaluations

Recommendation 48 suggests the use of "mandatory question(s) related to the Postsecondary Education Accessibility Standards compliance and inclusive instructional design in the learning environment" in student course or program evaluation questionnaires.

While questionnaires are good for capturing the student experience, responses are inherently influenced by factors outside of the professor's control, including the subject being taught, class size, and the professor's gender, race, accent, or other personal characteristics. Well-documented research suggests that the comment sections in these anonymous student questionnaires can and have been used to facilitate harassment.

Further, the simple fact is that students do not have expertise in evaluating accessibility standards and inclusive instructional design. As such, it is misguided to rely on student evaluations as the means for examining the compliance of a course or program with accessibility standards. While students' voices and feedback are valuable in informing and improving teaching and learning, they are an inadequate evaluation tool of the teaching and learning process and of accessibility standards.

Student evaluations can inform faculty to improve their teaching and class environment. They, however, should not be used to penalize their standing as employees, subject them to harassment, or punish them for factors outside of their control or for standards that are outside the students' expertise to comment on.

Peer reviews and evaluations by experts are possible effective alternatives.

Including faculty accommodation needs

OCUFA welcomes the committee's focus on student accessibility needs, and OCUFA's members are keen to participate in the process to attain accessible postsecondary institutions for Ontario's students.

OCUFA would bring the committee's attention to the report's near omission of faculty accessibility needs and the need for a meaningful recognition of access barriers for faculty and staff in setting accessibility standards for the sector. Students requiring accessibility measures are often requesting them from faculty members who themselves have accessibility needs.

This speaks to the importance of both including faculty accessibility needs in the process to transform the province's postsecondary institutions into accessible ones, and the need to provide supports for faculty, through staff support and hiring more full-time faculty members, to be part of this change. Otherwise, downloading the responsibility of meeting accommodation requests solely onto already overstretched faculty members is not a sustainable long-term measure.

Other suggestions

OCUFA strongly suggests that the report account for the diversity of needs and accommodation forms, as well as the diversity of pedagogical models in the higher education system. Accordingly, OCUFA recommends that the regulations avoid detailed and strict templates for syllabi and course outlines that would be applied to all institutions and programs. Instead, we recommend that the regulations provide clear guidelines and accountability measures. This way, the guidelines can be adopted at each institution and, where needed, be adapted and revised based on the circumstances and needs of each program and institution, the requirements of professional programs with third-party accreditation, and the student body they serve.

We welcome the recommendations on accessibility training for different groups on campus and would suggest that the training modules be updated regularly to reflect best practices. We also suggest that the recommendations note the importance of compensation for these trainings, particularly for groups such as contract faculty who do not get paid for their service or required training.

It is important that mental health disabilities and accommodations be further highlighted in the report and committee's recommendations, given the mental health crisis on Ontario's campuses, and the fact that mental health accommodations often take a different form than other kinds of accommodation.

It is also important that the committee incorporate accessibility requirements during construction and winter periods, both of which add additional obstacles related to mobility, and to ensure that these measures accommodate students, faculty and staff at postsecondary institutions.