

**THE CANADIAN HEARING SOCIETY  
LA SOCIÉTÉ CANADIENNE DE L'OUÏE**



**Response of The Canadian Hearing Society  
To the Parliamentary Assistant to the Minister of  
Training, Colleges and Universities' Discussion Paper  
on Adult Education and Training Review**

**July 2004**

***The Canadian Hearing Society***

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## INTRODUCTION

Founded in Toronto in 1940, The Canadian Hearing Society (CHS) is a community-based, multi-service, non-profit agency serving the needs of the deaf, deafened and hard of hearing communities. It is the largest agency of its kind in Canada. It employs approximately 450 people, including deaf, deafened, and hard of hearing and hearing individuals, in 13 regional offices and 15 sub-offices. A significant part of CHS's early mandate continues to this day, namely, advocating for and promoting the rights of deaf, deafened and hard of hearing consumers.

The Canadian Hearing Society has five literacy programs located in Thunder Bay, Sault Ste Marie, Sudbury, Peel Toronto, and Ottawa. These programs are designed to assist deaf and hard of hearing adults who are either newcomers to Canada, have limited language in ASL or English, lack independent living skills related to minimal communication skills and are willing and able to learn. The programs have different formats, but all are student focused, with a low staff-to-student ratio and in many cases use one-to-one training. All programs teach students to use ASL which is then used to teach them literacy, numeracy and consumer skills and enable them to function independently, moving on to more advanced training, post-secondary education and employment or community living.

CHS has submitted several briefs on Deaf education and Literacy Programs to the Ministry of Education since the Ministry's Deaf Education Review was conducted in 1989. These briefs include:

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| April 1989    | The Canadian Association of the Deaf – Deaf Illiteracy: A Genuine Education Puzzle or an Instrument of Oppression? A Critical Review by Roger J. Carver, M.Ed.                               |
| May 1989      | Minister of Education's Advisory Committee on Deaf Education for Review of Ontario Education Programs for Deaf and Hard of Hearing Students.   |
| May 1989      | Ministry of Colleges and Universities Review—Ontario Post-Secondary Education for Deaf and Hard of Hearing Students.   |
| May 1990      | Minister of Education's Francophone Advisory Committee Concerning French-Language Services to Deaf and Hard of Hearing Students.   |
| December 1991 | Report of the Review of Student Care at the Provincial Schools for the Deaf and Blind and Demonstration Schools.   |
| April 1992    | Minister of Colleges and Universities-Provincial Review of Visual Language Interpreting Services, Intervention Services for Deaf-Blind Persons, and Text-Based Services for Deaf and Hard of |

Hearing.

- August 1992      Second Report of the Francophone Equivalent to Provincial Schools to the Minister of Education.
- August 1993      Minister of Education's Advisory Committee on Deaf Education (Anglophone).
- May 1994        Future Directions for the Provincial and Demonstration Schools: A Report to Stakeholders.
- Oct. 1997        The Canadian Hard of Hearing Association Report-Hearing the Learning: A Post-Secondary Education Handbook for Students who are Hard of Hearing funded by Human Resources Development Canada.
- Sept. 1998      Ministry of Training, Colleges and Universities Report-Literacy Survey of Ontario's Deaf and Hard of Hearing Adults.
- Oct. 1998        Ministry of Training, Colleges and Universities-Results of an Informal Questionnaire to Determine Services for Students who are Deaf, Deafened and Hard of Hearing at Ontario Colleges and Universities.
- Oct. 1998        Council of Ontario Report - Access to Graduate and Professional Education Committee, A provincial Working Group funded by the Ministry of Training, Colleges and Universities.
- Dec. 1998        The Canadian Association of the Deaf Report-The Employment and Employability of Deaf Canadians, funded by Human Resources Development Canada.
- Oct. 1999        The Canadian Association of the Deaf Report-Access to Post-Secondary Education for Deaf Students, Funded by Human Resources Development Canada.
- Jan. 2000        The Canadian Association of the Deaf Report-Deaf Work: Challenges and Opportunities, funded by Human Resources Development Canada.
- June 2000        Provincial and Demonstration Schools' Council on Future Directions for the Provincial and Demonstration Schools.
- Sept. 2001        CHS Submission on HRDC's Summit on Canada's Innovation Strategy.

Sept. 2001	University of Toronto Report - Feasibility Study for a Transitional Year Program for Deaf Students at the University of Toronto.
November 2001	Standing Committee on Finance and Economic Affairs, with Respect to Bill 125, the proposed Ontarians with Disabilities Act.
Sept. 2002	Ontario Human Rights Commission's Consultation Paper: Education Rights Issues in Ontario's Education.
August 2003	Federal Ministers of Finance and National Revenue's Technical Advisory Committee on Tax Measures for Persons with Disabilities, Policy and Administrative Issues: Disability Tax Credit and Other Federal Tax Assistance Intended for Persons with Disabilities.
Sept. 2003	Goal: Ontario Literacy for Deaf People (GOLD) Report-Young Deaf Adults: Perceptions of Career Planning, Goal Setting & Literacy.
February 2004	The Canadian Hearing Society Status Report on Deaf, Deafened and Hard of Hearing Ontario Students in Post-Secondary Institutions: Status, Current Trends, Barriers & Recommendations.

CHS has participated in many government consultations regarding the Ministries of Education, Training, Colleges and Training, Citizenship for Disability Issues, Ontario Human Rights Commission and government initiated reviews. Reports have been submitted with recommendations concerning the prevention and the removal of barriers. Much time, expertise and expense have gone untapped.

CHS has prepared this brief to assist the Ministry of Training, Colleges and Universities' Adult Education Review in its deliberations on Adult Education reforms headed by Kathleen Wynne, Parliamentary Assistant to the Minister of Training, Colleges and Universities. We are pleased the review of adult education issues facing students with disabilities, including deaf, deafened and hard of hearing persons in Ontario's adult education system is moving forward. Your consultations and the policy decisions that will eventually result from them should serve to help students with disabilities, including deaf, deafened and hard of hearing persons while also increasing public awareness about the stereotypes and negative attitudes associated with deafness and hearing loss.

## **Some Statistics**

- Almost 1 in 4 Canadians experience some degree of hearing loss. (CHS Awareness Survey, October 2001).

- 1 in 10 Canadians with hearing loss are Deaf people who use sign language and/or captioning.
- 20% of Deaf Canadians are employed, 42% are under-employed and 38% are unemployed (Canadian Association of the Deaf, 1998).
- 85% of Deaf Ontarians are under-employed and unemployed (CAD, 1998).
- 48% of Deaf Canadians are unemployed (Statistics Canada, 1992).
- Hard of hearing employment rate is 33% lower than non-disabled Canadians (Statistics Canada, 1992).
- Only 8% of hard of hearing persons received work accommodation (Statistics Canada 1992).
- The Canadian Association of the Deaf's Report on Employment and Employability of Deaf Canadians indicate that large numbers of persons, especially deaf, deafened and hard of hearing consumers from northern and rural Ontario, have become victims of layoffs from private businesses and governments.

A 1992 Statistics Canada report noted that:

- 2% of Deaf Canadians held university degrees, compared to 14% of the general population.
- 2.7% of hard of hearing Canadians have university degrees.
- 13% of Deaf Canadians received their certificate/diploma.
- 8 % of Deaf Canadians obtained post-secondary education.
- 25% of Deaf Canadians received a high school education.
- 52% of Deaf Canadians obtained elementary education.

The Ontario Ministry of Education and Training's *Literacy Survey of Ontario's Deaf and Hard of Hearing Adults, 1998* reported that deaf and hard of hearing individuals are less likely to be employed and they earn less on the average than other Ontarians. This finding reflects the older age profile, the relatively low level of education, and the low literacy levels.

The Ontario Ministry of Education and Training's *Literacy Survey of Ontario's Deaf and Hard of Hearing Adults, 1998* has also showed high unemployment/under-employment rates, low rates of full-time employment and low rates of participation in post-secondary education and skill training programs. Currently, large numbers of deaf and hard of

hearing youth are receiving income maintenance. Unemployment of young deaf adults appears to be increasing: 24% of deaf youth in one study were unemployed 3-4 years after high school and an astonishing 40% of deaf youth with additional disabilities, in the same study, were unemployed.

Post-secondary education is crucial to the deaf, deafened and hard of hearing community. Dr. Carol Musselman of the Ontario Institute for Studies in Education at the University of Toronto wrote in a 1998 letter to then Minister of Education and Training David Johnson:

“D/deaf and hard of hearing individuals are disadvantaged educationally and vocationally. Information from Statistics Canada shows that few D/deaf and hard of hearing individuals complete secondary or post-secondary education. For example, only 3.1% attain a university degree, compared to 10.2% of the non-disabled population, a figure which falls to 1.7% among those who are profoundly deaf. It is thus not surprising that the labour force is only 52% compared to 77.9% for non-disabled peers. In addition to the human cost, the inability of D/deaf and hard of hearing individuals to fully participate in society incurs a social cost in the form of decreased productivity and the need for additional social welfare and mental health services”.

## **Background**

Research studies such as LaBarre, A. (1998): *Treatment of Sexually Abused Children Who are Deaf. Sexuality and Disability*, and Sullivan, P., Vernon, M., and Scanlan, J. (1987). *Sexual Abuse of Deaf Youth, American Annals of the Deaf*, report the incidence of sexual abuse in various samples of the deaf population to be between 11 and 54%, certainly higher than the published data for the population in general. LaBarre (1998) suggested that the incidence of sexual abuse for children who are deaf or hard of hearing can reach as high as 92%.

Furthermore, these research studies report that deaf children are more vulnerable to abuse than the general population. Factors involved in their vulnerability or susceptibility centre around communication ability and communication access, especially if the deaf children have hearing parents or are enrolled in school programs where communication access is limited (Sullivan,1998).

The Ministry of Education’s 1991 *Report of the Review of Student Care at the Provincial Schools for the Deaf and Blind and Demonstration Schools* noted that there were a number of allegations of abuse of students at the Provincial Schools for the Deaf and that investigations were conducted by the police and Children’s Aid Societies.

Sexual and physical abuse victims at the Provincial Schools for the Deaf and at school boards across Ontario have formed the Ontario Deaf Education Victims Network. The network provides former students with information on compensation, arranges interviews with investigators and obtains compensation through the private adjudication process.

In June 2001, the Supreme Court of Canada ruled unanimously that 280 claimants, all students of Jericho School for the Deaf in British Columbia, can now collectively sue the Government of British Columbia for compensation. Their class action suit alleges that school administrators left them vulnerable to, and failed to protect them from, sexual abuse.

Currently, individual complaints of discrimination have to reach all the way to the Supreme Court of Canada before change occurs. In 1997 the Supreme Court of Canada granted intervenor status to CHS, the Canadian Association of the Deaf, and the Advocacy Resource Centre for Persons with Disabilities in *Eldridge v. British Columbia*. The Court ruled that the failure to provide sign language interpretation where it is needed for effective communication in the delivery of health care services, social services, education and training and employment violates the rights of deaf consumers. Further, the Court stated that governments couldn't escape their constitutional obligations by passing on the responsibility of policy implementation to private entities not directly under the jurisdiction of the *Charter of Rights and Freedoms*.

In the Fall of 2000 CHS, along with the Canadian Hard of Hearing Association and the Canadian Association of the Deaf, were intervenors in a case deaf lawyer Scott Simser planned to take before a tribunal of the Canadian Human Rights Commission against the Tax Court of Canada. Negotiations resulted in a mutually satisfactory out-of-court settlement. On September 5, 2000, the Tax Court announced a landmark policy that acknowledges and accepts responsibility for arranging and paying for accommodation for deaf, deafened and hard of hearing lawyers, articling students and any parties they represent.

Even with landmark decisions such as *Eldridge* and Simser's out-of-court settlement, deaf, deafened and hard of hearing students still bear sole responsibility to fight for their right to access if provincial schools and school boards fail to comply. This is costly in terms of time, money and dignity. CHS strongly supports amendments to the *Ontario Human Rights Code* that will identify students with disabilities, including deaf, deafened and hard of hearing students as a discriminated group and strengthen enforcement mechanisms related to their protection. The existing legislation is insufficient in this regard.

The Ministry of Education and Training, Colleges and Universities has a legal obligation to ensure that education, literacy, post-secondary education and training are accessible to individuals who are deaf, deafened and hard of hearing and that it complies with the Canadian Charter Rights and Freedoms, the Ontario Human Rights Code and the Ontarians with Disabilities Act.

The World Federation of the Deaf is a member of the United Nations and its position statement on Vision and Goals for Access to Adult Education for Deaf People indicates:

**Adult education policies must take full account of individual differences and situations. The importance of Sign Language and involvement of Deaf people as resources in adult education programmes must be recognized. Provision should be made to ensure that all Deaf adult students have access to education 1) in their native Sign Language; 2) in special classes with other Deaf students; and 3) at all levels of education, as appropriate. Deaf people should be involved in planning, implementing and evaluating adult programs to ensure appropriateness, relevancy and quality.**

This statement is supported by Gallaudet University's Declaration on Adults with Special Learning Needs, 1987, United Nations Standard Rules on Equalization of Opportunities for Persons with Disabilities, UN, 1994, UN and the Salamanca Statement on Special Needs Education, 1994 and UNESCO and the Hamburg Statement on Adult Education Rights, 1997.

The Canadian Association of the Deaf position paper, (July, 2002) on Literacy is that the high rate of functional illiteracy is not a result of deafness in itself. Shifting away from the deficit model of early intervention and education and towards a different model would help to improve the literacy and educational achievements of Deaf people.

Furthermore, the Canadian Association of the Deaf rejects the concept that deafness is the major cause of literacy problems in Deaf children. The CAD attributes the literacy and educational problems of Deaf Canadians to the impaired communication environment surrounding them; to the deficit model orientation of early education and teacher training programs; and to the lack of qualified Deaf professionals and educators in all such programs.

The CAD supports the principle that literacy is the crucial access point for Deaf Canadians into all aspects of the hearing world, and that it should take precedence over spoken English/French skills in all of the above programs. The CAD also subscribes to the different model principle in which all the intact faculties and strengths of the Deaf individual are fully utilized in his/her development, as opposed to the attempted utilization of defective or inadequate faculties.

In order to enhance the literacy and educational status of the Deaf individual, the CAD makes the following points:

1. The Deaf individual should have free and unrestricted access to visible and natural language and communication.
2. The focus should be shifted away from the deficit model and toward that of the different model in all early intervention, education, and teacher training programs serving Deaf students.

3. Such programs should commit themselves to the training and/or employment of qualified Deaf professionals and educators in significant numbers.
4. Such programs should place greater emphasis on the employment of print language as a key instructional and communication modality.

## RESPONSES TO THE QUESTIONS

### **Is there a need to have an Ontario definition for adult education? What would such a definition include?**

The definition would include the following areas:

- Access and accommodation in the learning environment in an effort to comply with the Canadian Charter of Rights and Freedoms, the Ontario Human Rights Code and the Ontarians with Disabilities Act.
- Duty to accommodate the needs of literacy learners with language and special needs i.e. American Sign Language (ASL), Langue des signes quebecoise, (LSQ) intervenors for deaf-blind (to ensure that deaf, deafened, hard of hearing and deaf-blind have access to the learning environment).
- Anti-ableism and anti-audism education as part of the adult education definition.
- Lifelong learning.
- Need to include the goal to employment as part of adult education.
- Broad in scope, including employment, community and leadership opportunities.
- Would include consumer skills, self-directed skills and vocational skills.
- Recognize various learning styles.
- Recognition and credit for all adult learning.
- Employ literacy practitioners with appropriate ASL/LSQ skills and effective communication skills.
- Advocate for best practices and best policies in adult education with respect to specialization in adult education in the field of literacy regarding the needs of deaf, deafened and hard of hearing adult learners.

### **How are adult education, training and upgrading opportunities addressing current and anticipated economic and social changes?**

- Trained literacy practitioners who are not knowledgeable in the issues of deaf, deafened and hard of hearing learners.
- Professionals who know the needs and issues of deaf, deafened and hard of hearing learners but are not trained literacy practitioners.
- Untrained literacy practitioners who are mostly unfamiliar with the unique needs of deaf, deafened and hard of hearing learners who often receive inappropriate referrals and unsatisfactory outcomes.

- Literacy practitioners in the Deaf stream face systemic barriers daily i.e. no/limited accessible resources, teaching materials, and support ASL skills development. This has a real impact on literacy service potential.
- Deaf literacy stream (both staff and learners) must receive equitable support i.e. funding and resource allocation from MTCU. Any less is an injustice.
- To have an excellent model to meet the actual needs of deaf, deafened and hard of hearing learners, we need trained literacy practitioners who are knowledgeable of the issues of deaf, deafened and hard of hearing learners and can communicate effectively with them. Also for professionals who are deaf, deafened or hard of hearing and are trained as literacy practitioners.
- Lack of specialized career support and employment services for deaf, deafened and hard of hearing literacy students.
- Lack of accommodation funds to cover the cost of sign language interpreters, Deaf interpreter, job coach, communication coach and intervenors for summer or part-time jobs for literacy students who are not clients of HRDC, Ontario Disability Support Programs, (ODSP) or Ontario Works.
- Double taxation on both sign language interpreters and deaf employment insurance recipients who use funds from HRSD.
- Serious attitudinal barriers are evident in expectations, perceptions, beliefs and behaviours of local, provincial and federal policymakers of HRSD, ODSP and Ontario Works regarding the employability and capabilities of deaf, deafened and hard of hearing learners, e.g. HRSD, ODSP and Ontario Works' concern that literacy and vocational skills training may take longer and be more difficult for deaf, deafened and hard of hearing applicants/learners and may exceed the budget for accommodation. **This is an example of a form of audism, referring to prejudgment or discrimination against deaf people and people with hearing loss.**
- Need to have anti-audism education/anti-discrimination training in literacy practitioners' training and adult education.

## Systemic Discrimination

Systemically imposed isolation and barriers to participation are key human rights themes for deaf and hard of hearing adult learners. Isolation is the result of unaccommodated communication and language needs. An inability to participate is the reality. Systemic discrimination against deaf, deafened and hard of hearing adult learners creates complex quality-of-life and will-to-live issues. Only deliberate pro-active modification in communication behaviours, supported by policy, can address the potentially devastating reality of disempowerment, and isolation created by society.

Due to communication barriers confronting deaf and hard of hearing adult learners, the best environment for a deaf or hard of hearing adult learner may be a placement considered by the general public as more restrictive, for example, a specialized literacy program for the deaf and hard of hearing at a centralized location such as the IMPACT-ASL program offered by CHS Toronto or the Adult Education Centre offered by the ECD School for the Deaf, or a self-contained classroom for the deaf in adult education such as

the Deaf Empowerment program offered by Mohawk College . Moores (1993) postulated that integrating deaf learners in hearing classrooms (inclusive education) in some cases may actually be an exclusionary practice.

Having said that, the high stakes consequences of the current Grade 10 Literacy Test (or course equivalent) discriminates against a significant minority of Ontario students, including those with disabilities, those for whom English is a second language, and those in the applied program (where deaf, deafened and hard of hearing students/learners are disproportionately represented).

For such a test to be fairly administered remedial programs (including those cut by previous government) must be reinstated and literacy standards developed which adequately reflect the needs and abilities of students/learners in the province's applied, as well as academic and adult education programs. These goals will not be accomplished without budgetary and curriculum changes which will take time. Until such changes are in place, the consequences of the Grade 10 Literacy Test will be extremely harmful to these individuals.

This clearly adds unimaginable and unnecessary hardship that creates a serious new barrier facing deaf, deafened and hard of hearing students/learners who have been motivated to seek career opportunities. Requiring the Deaf, deafened and hard of hearing students/literacy learners to acquire the literacy test's English fluency levels will deprive them of their post-secondary education, adult education, apprenticeship and continued educational opportunities. If the government does not act, it will be responsible for frustrating the legitimate educational/literacy goals and expectations of those students/literacy learners who are already the most disadvantaged in Ontario.

In addition, this approach risks adding a serious financial burden, and will result significantly in unemployment, underemployment and unbearable costs to taxpayers for welfare services, when these individuals have no access to higher education, and their employment opportunities will be severely limited. We urge the Ministry of Education and Ministry of Training, Colleges and Universities to suspend the "high stakes" testing.

**What can be done within existing budgets to enhance learning opportunities? If an opportunity to reallocate resources arises, what are the leading priorities for re-investment?**

- The Canadian Hearing Society literacy programs and other literacy programs for Deaf and Hard of Hearing are all under-funded. We have waiting lists. We need money for accommodation within the program. The literacy budget is too low. Provincial co-ordination is not paid for. We need to co-ordinate across the province, for the purpose of staff training, transportation for literacy practitioners and exchange information for best practices and best resources available through the GOLD and CHS programs.

- Expectations for accreditation are unrealistic and unreasonable. The Grade 10 literacy test for graduation from Grade 12 and access to OSAP and post-secondary education and adult education (preparatory program or transition year program) are a real financial barrier.
- The MTCU Adult Education/Literacy program is now shifting toward an employment focus, excluding those learners who need to continue to upgrade their English and ASL skills. MTCU appears to look at upgrading literacy only, but adult education needs to include people who are learning ASL for the first time.
- It is important to recognize the needs of Deaf learners' ASL literacy skills development for building a foundation for future language and literacy development.
- We need MTCU to ensure there is adequate funding for program managers, including full administration support as well as annual increases to cover the cost of rising rent, salaries and maternity leave replacement. Without our infrastructure support, we cannot provide adequate services. This negatively affects the quality of our service and ultimately affects the students' learning outcomes.
- In the light of the Canadian Charter of Rights and Freedoms, the Ontario Human Rights Code and the Ontarians with Disabilities Act, the Ministry of Training, Colleges and Universities should put money into access, and not lawyers, to defend against human rights claims.
- Even with these landmark cases and policies, individuals/learners continue to shoulder the responsibility to fight for their rights to literacy programs our government does not provide access to. It is costly in time, money and human dignity to take every violation before the Human Rights Commission on a case-by-case basis.

The Ontario Human Rights Commission's Consultation Report, *The Opportunity to Succeed: Achieving Barrier-Free Education for Students with Disabilities* was released in October, 2003. The Commission's press release indicates that they will develop *Guidelines on Accessibility*, which will address disability and the duty to accommodate in the educational sector.

These Guidelines will outline the Commission's interpretation of the legal responsibilities of all parties to the accommodation process with respect to: access to education, negative attitudes and stereotypes, determining and providing appropriate accommodations, respecting the confidentiality of persons with disabilities, developing a dignified and effective accommodation process, and applying the undue hardship standard. The Guidelines will also incorporate an intersectional analysis of discrimination.

**Do you agree with the elements for a framework that are described in the discussion paper? What would you change? What would you add?**

Yes indeed, and we could assume one size fits all for Native, Anglophone, and Francophone Literacy Streams for the purposes of coordination and linkages; accessibility/inclusion; innovation and accountability and effectiveness, although it may not work for the Deaf/deafblind Stream.

Contact hours are a big issue. MTCU needs to be aware that our learners do their best when one on one. Also, culturally, their teaching strategies do not always fit - i.e. setting goals for learning, which is a very mainstream approach.

Sharing best practices alone will not remove or prevent barriers. Furthermore, who decides what the best practice is? CHS, other literacy programs for Deaf and deaf/blind and learners believe that appropriate access to adult education and post-secondary education along a continuum of mainstream to specialized literacy programs and adult education is the best practice.

However, we have a hard time convincing the government to support this approach when the government's service delivery model is based on an integrated, mainstream system. The current model does not represent or address the full continuum of needs of deaf and hard of hearing literacy placements/programs.

Another concern is that many parents of deaf and hard of hearing children/learners were and are still not empowered to make informed choices about the benefits, limitations and possible risks of language, communication and educational placement/literacy placement options. For example, the Ministry of Education's Special Education Guide for parents of deaf and hard of hearing students and service providers/literacy practitioners in educational settings does not address the actual needs of deaf and hard of hearing students/learners in terms of providing appropriate assessments and communication supports to meet the language and communication needs of deaf and hard of hearing students/literacy learners.

*However, excellent mechanisms and resource centres such as Gallaudet has gone untapped. The university's Laurent Clerc National Deaf Education Centre at <http://clearcenter.gallaudet.edu>; National Technical Institute for the Deaf's PEPNET, Post-Secondary Education Programs Network, serving the Deaf, Deafened and Hard of Hearing at [www.pepnet.org](http://www.pepnet.org) ; Arkansas Rehabilitation Research and Training Center for Persons who are Deaf or Hard of Hearing, including secondary and post secondary education at [www.uark/depts/rehabres/mission.html](http://www.uark/depts/rehabres/mission.html) and Educational Enhancement for the field of the Deaf Education at <http://www.deafed.net>*

**How can we improve the results and outcomes for adult learners in Ontario?**

Effective communication in the literacy classroom is a key factor to learners' literacy skills development. In reality, most literacy practitioners' language and communication skills are ineffective. We need an ASL proficiency skills policy for literacy practitioners

to ensure that they are able to communicate and teach effectively learners who need appropriate communication access in the classroom.

ASL Literacy Practitioners Training needs to be established a college program such as George Brown College to build a pool of qualified ASL literacy practitioners and this will improve the results and outcomes for deaf, deafened and hard of hearing adult learners in Ontario.

In general, specialized literacy programs such as IMPACT ASL at Toronto's CHS and the Adult Centre for Education at ECD School for the Deaf is more effective for most learners who are deaf, deafened and hard of hearing, compared to those learners who require communication access in a mainstreamed literacy program.

CHS recommends that the Ministry of Training, Colleges and Universities will develop and issue a policy statement and implement anti-audism/anti-ableism education and anti-discrimination training, including the establishment of funding priorities and resources allocation for adult education programs to make literacy programs accessible and culturally appropriate to deaf, deafened and hard of hearing learners.

Furthermore, MTCU, Ministry of Education and Human Resources and Skills Development will examine barriers, gaps and needs of deaf, deafened and hard of hearing high school students, adult education learners and post-secondary students, and identify ways to establish specialized career support and employment services provided by CHS. This will assist high school students, adult education learners across Ontario to prepare for the transition to work while still in school or adult education, or to make an adjustment should there be career change opportunities or retraining, by providing information, administration support, career guidance and support services to ensure that they continue to have appropriate access to information, communication and follow up in and outside of the adult education programs.

We need the ASL/LSQ regulation to be amended to the Statute of Education Act for ASL/LSQ literacy standards development and the requirement for literacy practitioners who are in the field of ASL/LSQ literacy programs. Also, MTCU and its provincial working committee will reference in a handbook published by MTCU, the guidance materials on adult education and post-secondary options and services for deaf, deaf/blind, deafened and hard of hearing high school students, adult education learners, post-secondary students and other potential applicants.