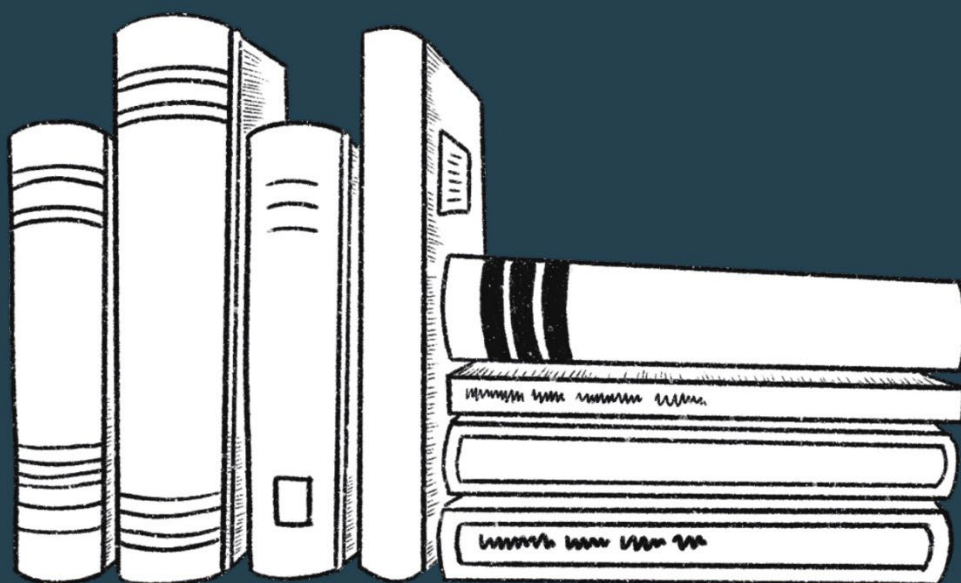


Higher Education Quality Council of Ontario



An agency of the Government of Ontario



Accessibility Services at Ontario Colleges and Universities: Trends, Challenges and Recommendations for Government Funding Strategies

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Published by:

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Cite this publication in the following format:

Lanthier, S., Tishcoff, R., Gordon, S., & Colyar, J. (2023). *Accessibility services at Ontario colleges and universities: Trends, challenges and recommendations for government funding strategies*. Higher Education Quality Council of Ontario.



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Acknowledgements

We owe heartfelt thanks to all the individuals who work tirelessly to support students with disabilities and who shared their experiences with us. Your perspectives were invaluable in shaping our research.

We are grateful to our reviewers for their expertise and helpful feedback in support of our work, and to Lena Balata for co-ordinating this review.

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Executive Summary

To accommodate the needs of postsecondary students with disabilities — a legal obligation set out in the *Human Rights Code* (1990) — Ontario universities and colleges provide a range of services through Offices for Students with Disabilities (OSDs). OSDs rely on institutional funding, as well as special purpose grants provided by the Ministry of Colleges and Universities (MCU). These grants distributed \$54 million to postsecondary institutions in 2022-23. The largest grant, the Accessibility Fund for Students with Disabilities (AFSD), distributes \$32 million annually. Institutions provide MCU with annual reports and/or financial statements for each grant they receive.

Growing demand for accessibility services is well documented in the literature and media: a result of students who require accommodation attending postsecondary in far greater numbers, as well as greater societal awareness and recognition of various kinds of disabilities, including mental health concerns. Researchers, institutional representatives, and community and advocacy groups have stressed that increases in student accessibility needs outpace institutions' capacity to provide timely, robust support. Government funding has not increased to reflect increasing accessibility needs. Many students with disabilities continue to lag behind their peers in accessing and graduating from postsecondary education (PSE) programs.

No recent public records exist, however, of OSD registrants in the sector — nor is there a record of changes in institutional investments and MCU funding over time. To fill these gaps, HEQCO reviewed all public institutions' AFSD and Support for Apprentices with Disabilities reports to calculate annual OSD registrants and per-student funding from 2013 to 2022. We then interviewed key subject-matter experts (from OSDs, system-wide committees, advocacy groups and MCU) on how institutions use grants and internal funds; how services have evolved to meet demand; and how institutions evaluate the effectiveness of services.

Our data confirm the growing demand for support, particularly for disabilities that require ongoing intervention. Since 2013, annual OSD registrations at universities increased by 126%; mental health and Attention-Deficit Hyperactivity Disorder (ADHD) registrations increased by 76% and 107%, respectively since 2016. Demand has also increased in terms of complexity. Students increasingly present with multiple disabilities at once; seek support to overcome barriers beyond their registered disability (involving social determinants of health); and do so across a wide range of learning environments, such as experiential learning and remote classrooms, which became more common during and after the pandemic. These factors must be jointly considered to develop an accommodation plan that meets each student's specific needs. Such factors stress a system that is also underfunded. Despite increases in OSD registrations and increasingly complex student needs, funding for special purpose grants was static from 2016 to 2022, resulting in a 23% decrease per student. Underfunding is notably acute for universities; university per-student funding dropped to 67% of what colleges received in 2021-22.

Meeting demand has fallen on institutions: expenditures to support accommodation needs rose by 14% from 2016 to 2019. OSD staff have expanded service delivery models, expedited intake processes and turned to innovative technologies and tools to replace costly alternatives and alleviate service loads. Even so, staff still carry “extraordinarily high” caseloads and OSDs often operate short-staffed: more personnel are taking unpaid leaves of absences due to elevated

stress levels and burnout, overall turnover is high and recruiting new staff is challenging. This contributes to longer service wait times.

These challenges are compounded by outdated funding administration and reporting policies that do not reflect the complexity of students' needs and OSD services. AFSD allocations are recalculated annually using retrospective data, but MCU funding is fixed and has not kept up with the rapid growth in demand for accessibility services. The ministry's reporting structure does not adequately capture service demand because it limits institutions to indicating one disability per registered student. Annual reports do not include outcome or impact data and capture only high-level service inputs. More robust data is required to understand the scope of student support needs.

The Postsecondary Education Standards Development Committee (PSE-SDC) and the Ontario Human Rights Commission (OHRC) have called on MCU to provide adequate and stable funding, noting that adopting such an approach would require significant training and investment. Echoing the OHRC and PSE-SDC, HEQCO offers the following recommendations:

- Increase funding to all institutions. We recommend an increased, permanent and sustained funding strategy, rather than top-ups or add-ons.
- Consolidate funding programs and reduce the number of grants to better reflect students with multiple disabilities and needs, simplify reporting and build stability.
- Revise annual reporting to capture data on the complexity of required supports and program impacts. These data can inform funding allocations with a focus on outcomes.

Introduction

Federal and provincial human rights statutes outline accessibility requirements for PSE in Ontario. The Canadian *Charter of Rights and Freedoms* (1982) protects equality rights in policies and practices of all public entities, including postsecondary institutions, and the Ontario *Human Rights Code* (1990) confirms that every person has a right to equal treatment in education¹ without discrimination based on ability. Under the *Code*, postsecondary institutions have a legal duty to accommodate the needs of students with disabilities² to ensure their full participation, up to the point of undue hardship for the institution. The Ontario Human Rights Commission (OHRC, n.d.) upholds the *Code* through “education, policy development, public inquiries and litigation.” For example, OHRC’s Policy on Accessible Education for Students with Disabilities (2018) outlines the legal rights and responsibilities set out in the *Code* as they relate to disability in educational contexts. The policy notes: “Educational institutions operating in Ontario have a legal duty to ... maintain accessible, inclusive, discrimination and harassment-free education environments that respect human rights” (OHRC, 2018).

Postsecondary education providers also have obligations under the *Accessibility for Ontarians with Disabilities Act* (2005), which outlines standards for addressing the right to equal opportunity and inclusion for people with disabilities. Under the AODA, the Postsecondary Education Standards Development Committee (PSE-SDC) was charged with creating and recommending new accessibility education standards in 2017. While these legislative initiatives work in concert, the *Code* has primacy in Ontario (Ontario Human Rights Commission (OHRC), 2017).

To fulfill their legal duties under the *Code*, Ontario’s publicly assisted institutions provide accommodation services to students with disabilities via OSDs.³ These services are supported through institutional investments and by funding provided by the Ministry of Colleges and Universities (MCU), principally through 10 special purpose grants; these grants distributed \$54 million to institutions in 2022-23 (see Appendix A for an overview of MCU’s grant programs). Special purpose grants are earmarked for explicit services to help make accommodation available to students across a range of accessibility needs. Depending on the grant, funding allocations are administered according to formulas, reimbursement claims or particular projects. The largest grant, the Accessibility Fund for Students with Disabilities (AFSD), distributes \$32 million annually to help fund OSD services. For allocation and tracking purposes, institutions provide MCU with annual reports and/or financial statements for each grant they receive directly.

Despite the range of supports available, students with disabilities navigate many challenges in PSE; compared to peers without disabilities, they are less likely to access and complete their credentials (McCloy & Declou, 2013; Pichette et al., 2020; PSE-SDC, 2022; Chatoor, 2021; Chatoor et al., 2022; McDiarmid, 2023). Demand for accessibility services has grown considerably over the past 30 years (Condra et al., 2015; De Costa et al., 2022; Government of

¹ Equal treatment in education is not defined specifically; it is captured under the protection for equal treatment in “services” (*Human Rights Code*, R.S.O. 1990, c. H.19, 1990).

² The Ontario *Human Rights Code* (the *Code*) relies on a broad definition of disability that includes physical, developmental, visual, hearing, learning, mental, health and injury-related disability (*Human Rights Code*, 1990).

³ This report uses the term “Offices for Students with Disabilities (OSDs)” to refer to institutional offices that manage and provide accommodation services. Other terms commonly used to refer to these offices in Ontario include Disability Services Offices (DSOs) and Accessibility Services Offices (ASOs).

Ontario, 2021; Kanani & Shanouda, 2016; OHRC, 2017; Shanouda & Spagnuolo, 2020): more students pursue postsecondary programs, meaning more students require accessibility support (Condra et al., 2015). Shifts in social attitudes and advancements in accessible technology mean that individuals who were once discouraged from attending PSE are enrolling in higher numbers ([Chatoor et al., 2022](#); Guenot & Jaber, 2022). As society develops greater awareness and recognition of accessibility issues, and particularly for those with non-visible disabilities, institutions must accommodate an increasingly diverse array of disabilities (Linden et al., 2021; Ministry of Training, Colleges and Universities, 2004). For example, two decades ago, students rarely sought mental health accommodations; the rate at which they request these accommodations is now unprecedented (Canadian Alliance of Student Associations, 2021; Colleges Ontario et al., 2017; Ministry of Training, Colleges and Universities, 2004; OHRC, 2016; OHRC, 2017).

Institutions typically provide support to students with disabilities through a request-based model, which means students formally seek out accommodations for each program, course or activity (Bruce & Aylward, 2021; Fichten et al., 2022; Fichten et al., 2016; Lightfoot et al., 2018; Shanouda & Spagnuolo, 2020). This model, with accommodations planned and delivered one student at a time and according to individual needs, reflects OHRC Guidelines on Accessible Education (2018). The COVID-19 pandemic required OSDs to adapt accommodations for remote and online learning — and as institutions emerge from the pandemic, learning is increasingly reliant on technology and extends beyond the traditional, in-person classroom (Brennan et al., 2021; Brown, 2022; Johnson, 2021). This environment makes individualizing accommodations more complex: students require accommodations tailored to multiple course delivery modes and means of assessment in a single term. Amid long wait times and other administrative challenges, scholars have argued that the request-based model is now unsustainable given the dramatic increase in student support needs (Lightfoot et al., 2018; Lindsay et al., 2018; Fichten et al., 2016).

The importance of making learning more universally accessible requires urgent attention under these conditions (OHRC, 2018; PSE-SDC, 2022). Recent accessibility recommendations developed by the PSE-SDC (2022) propose that PSE campuses broadly implement accessible learning strategies and infrastructure to help reduce reliance on individual accommodations. The PSE-SDC (2022) and the OHRC (2018) have called on government to provide adequate and stable funding to support the implementation of these standards, noting that adopting such an approach would require significant training and investment from an already overburdened system.

This report investigates the role that MCU special purpose grants play in helping institutions meet the evolving needs of students with disabilities.⁴ It synthesizes data on MCU grant funding allocations and Students with Disabilities (SWD) registrations and offers key takeaways from interviews with representatives from OSDs at Ontario colleges and universities. In doing so, it highlights a need for better data in this space: no recent public record exists detailing how the allocation and use of ministry funds and institutional resources have changed to ensure accessibility services meet accessibility needs, nor has there been a public historical record of how many OSD registrants (representing demand for services) are in the sector. The report

⁴ In its 2022 Letter of Direction, MCU requested that the Higher Education Quality Council of Ontario (HEQCO) evaluate ministry programs that support students with disabilities.

concludes with recommendations for how the Ontario government can update and improve its funding strategies to support students with disabilities.

Research Questions and Methodology

To better understand how institutions use ministry-allocated and internal resources to provide disability support services, HEQCO explored the following research questions:

1. How has the demand for accessibility services and the amount of ministry-allocated funding changed over time?
2. How do institutions use ministry-allocated and internal funds to provide support services for students with disabilities?
3. How can MCU adapt its funding approach to better support institutional services and supports?

HEQCO reviewed all public institutions' annual AFSD and Support for Apprentices with Disabilities⁵ (SAWD) reports from 2013 to 2022.⁶ Annual reports included the number of students and apprentices⁷ who registered for OSD support by specific disability type, institutions' funding-eligible expenditures and the combined amount of AFSD and SAWD funding institutions received. These data were used to calculate annual per-student funding⁸ for the college and university sectors.

Eighteen interviews were conducted with key subject-matter experts from college and university OSDs (for example, OSD directors, co-ordinators, managers, support staff and counsellors), as well as representatives from system-wide committees, advocacy groups and MCU. HEQCO sought balance in terms of institution size, type and geographic location in our outreach. Some interviews included more than one institutional or agency representative. Questions focused on how postsecondary institutions use special purpose grants and internal funds to provide support services for students with disabilities; how services have evolved over the years to meet increasing demand for accommodations; and how institutions evaluate the effectiveness of these services. Interviewees were also asked how the ministry might reduce the reporting burden and streamline special purpose grants. Interview responses were coded using NVivo software. See Appendix C for a list of interview questions.

Findings

Interviewees' comments and MCU data provide insights into the challenges PSE institutions face in supporting students with disabilities. The following section outlines five key findings related to trends in accessibility needs and institutional responses.

⁵ Colleges receive SAWD funding to support apprentices with disabilities. Colleges claim registered apprentices and SAWD-eligible expenses as part of their annual ASFD reporting. Throughout this report, college OSD data include students and apprentices.

⁶ This report focuses on data available in the AFSD/SAWD annual reports. Information from other MCU special purpose grants was not available for analysis.

⁷ OSD registration totals include domestic, international, part-time and full-time students.

⁸ Per-student annual funding was calculated by dividing combined AFSD and SAWD funding by the number of OSD registrants in each sector, each year.

The demand for accommodation and accessibility support in Ontario is growing and students' primary needs are changing.

Table 1 summarizes Ontario student enrolments and OSD registrations between 2013 and 2022. Consistent with previous research, the data show that more Ontario PSE students are seeking OSD services (Condra et al., 2015; De Costa et al., 2022; Government of Ontario, 2021; Kanani & Shanouda, 2016; OHRC, 2017; Shanouda & Spagnuolo, 2020). Growth differed between the sectors: while total university enrolments increased by 17% (427,938 to 499,136), annual university OSD registrations increased by 126% (from 25,799 to 58,245). Total college enrolments increased by 23% (226,132 to 278,424), but annual college OSD registrations increased by 36% (28,555 to 38,845). In the college and university sectors combined, SWD registrations increased by nearly 80% between 2013-14 and 2020-21, and the proportion of students registered with OSDs increased by four percentage points.

Table 1

Fall Full-time Headcounts and Number and Percentage of Students and Apprentices Registered at Ontario College and University OSDs Annually from 2013 to 2022

	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22
Universities									
Fall Full-time Headcounts	427,938	433,797	440,666	450,750	459,720	470,308	480,511	490,735	499,136
SWD (#)	25,799	28,725	31,993	36,830	42,376	47,219	50,575	52,261	58,245
SWD (%)	6.0	6.6	7.3	8.2	9.2	10.0	10.5	10.6	11.7
Colleges									
Fall Full-time Headcounts	226,132	228,753	234,967	237,894	257,257	273,414	276,473	273,515	278,424
SWD (#)	28,555	30,696	34,815	38,766	41,152	44,754	45,184	38,397	38,845
SWD (%)	12.6	13.4	14.8	16.3	16.0	16.4	16.3	14.0	14.0
Both Sectors									
Fall Full-time Headcounts	654,070	662,550	675,633	688,644	716,977	743,722	756,984	764,250	777,560
SWD (#)	54,354	59,421	66,808	75,596	83,528	91,973	95,759	90,658	97,090
SWD (%)	8.3	9.0	9.9	11.0	11.7	12.4	12.7	11.9	12.5

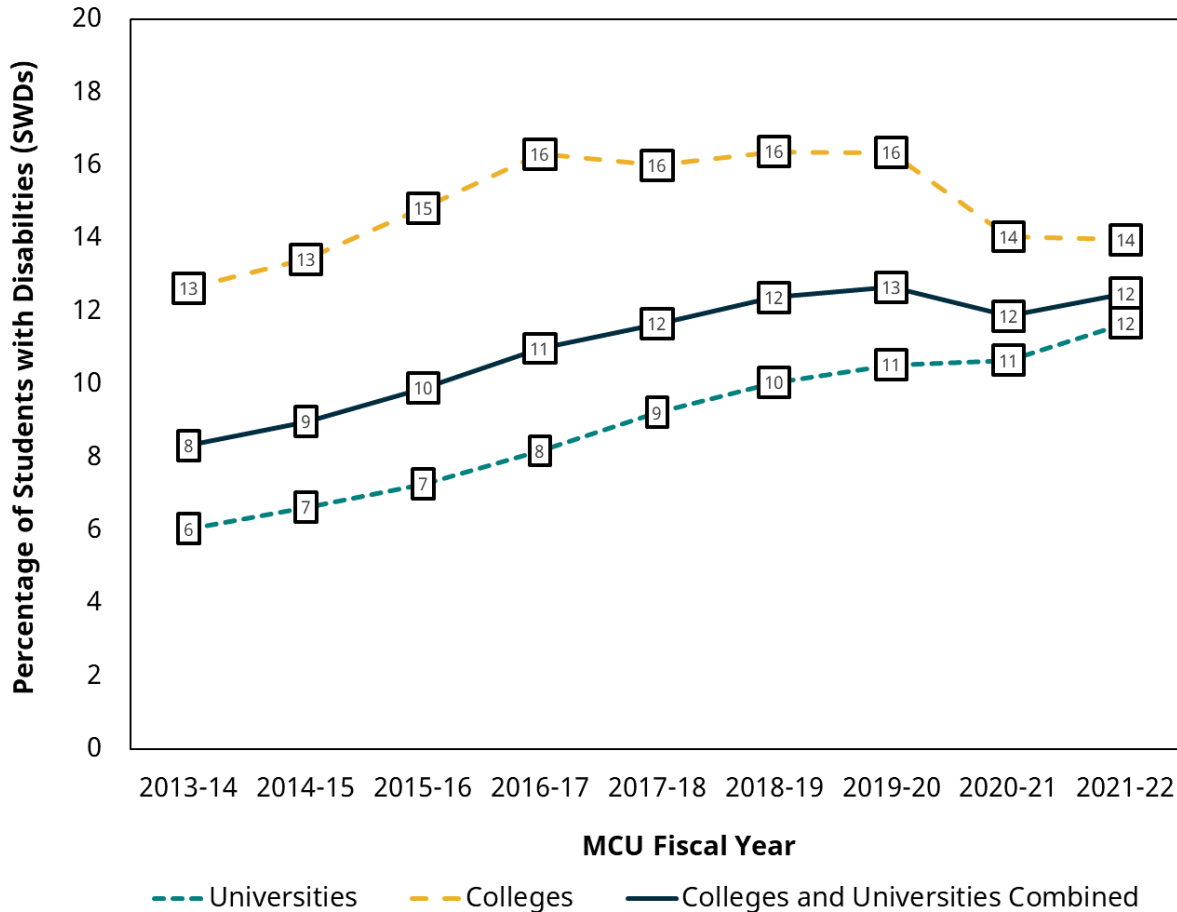
Source: Council of Ontario Universities (n.d.); MCU (2013–2022a; 2013-2022b; 2023a).

Note: This table shows the annual fall full-time headcounts for Ontario colleges and universities from 2013 to 2022 and the annual number and percentage of students and apprentices registered at Ontario college and university OSDs from 2013 to 2022.

Figure 1 shows the proportional growth in OSD registrations over the same period. Proportional growth in university OSD registrations (a growth of six percentage points) exceeded the combined overall growth in colleges and universities (a growth of four percentage points) and far exceeded proportional growth in college OSD registrations (a growth of just under two percentage points).

Figure 1

Percentage of Students and Apprentices with Disabilities Registered through Offices of Students with Disabilities at Ontario Colleges and Universities, 2013 to 2022



Source: Council of Ontario Universities (n.d.); MCU (2013–2022a; 2013–2022b; 2023a).

Note: This figure shows the proportion (by percentage, removing decimals) of Ontario college and university students and apprentices registered annually through Offices of Students with Disabilities from 2013 to 2022.

Although the total number of college OSD registrations increased annually until 2020-21 (see Table 1), the proportion of college students registered at OSDs stabilized at 16% after 2016-17 (see Figure 1). The lack of complementary proportional growth may be explained by the following factors. The first is that colleges had fewer opportunities for rapid growth because the proportion of students registered at OSDs was higher than university students to begin with: 12.6% at colleges and 6% at universities. More college students than university students sought accommodations historically ([McCloy & Declou, 2013](#)), and at 12.6%, enrolments were already close to the overall percentage of Ontarians aged 15 to 24 years who live with disabilities, which is 13.6% (Morris et al., 2018). In this way, scanning proportional growth alone can be misleading; even in 2021-22, university OSDs still registered proportionally fewer students (11.7%) than colleges did a full eight years earlier.

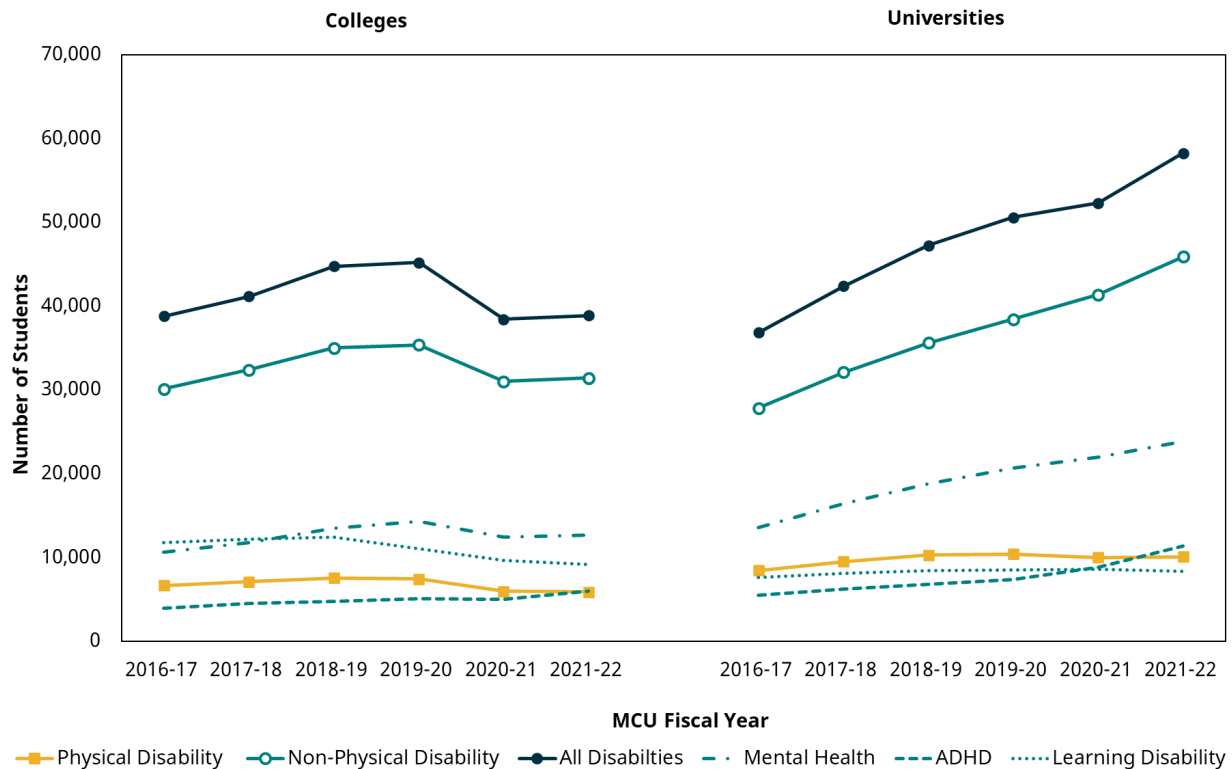
Lower proportional versus numerical growth may also be a result of overall increases in college OSD registrations concurrent with large enrolment increases for international students over the past decade. International students seek accommodations at lower rates (Alabdulwahab, 2016; McGregor et al., 2016; Soorenian, 2013), which may keep the proportion of OSD registrations stable.

Finally, there was a drop in college OSD registrations during the pandemic years (2020–2022) from 16% to 14%. This change was likely caused by remote learning modifying how students with disabilities access OSDs, and postsecondary more generally, rather than a decrease in student need for support (Aquino & Scott, 2023; Madaus et al., 2022). More data from after the pandemic are required to confirm whether trends observed before the pandemic persist.

Increases to OSD registration varied depending on the disability type. MCU uses three broad types of disabilities to categorize student and apprentice OSD registrations: 'Physical,' 'Non-Physical' and 'Either Physical or Non-Physical' (e.g., students with an unspecified or undiagnosed disability, students with both 'Physical' and 'Non-Physical' disabilities, and so forth). Physical disabilities are divided into seven sub-types: chronic illness/systemic/medical, mobility, deaf/deafened/hard of hearing, acquired brain injury, low vision/blind, undiagnosed physical disability, and 'other.' Likewise, non-physical disabilities are divided into seven sub-types: mental health, learning disability, ADHD, autism spectrum disorder (ASD), addiction, undiagnosed nonphysical disability, and 'other.' Figure 2 presents the number of students who registered with all disabilities, physical and non-physical disabilities and the three most common sub-types (mental health, ADHD and learning disabilities) between 2016 and 2022.

Figure 2

Number of Ontario Students and Apprentices Registered at College and University OSDs Annually by Disability Type, 2016 to 2022



Source: Council of Ontario Universities (n.d.); MCU (2013–2022a; 2013–2022b; 2023a).

Note: This figure shows the number of students/apprentices who registered with different disabilities at college and university OSDs annually from 2016 to 2022.

Addressing student accommodation and accessibility needs is increasingly complex.

Student accessibility needs have become more complex and challenging to accommodate in recent years. Interviewees felt this was due, in part, to an increased willingness to seek help for mental health and other non-physical concerns, which often require more complex and ongoing interventions than physical disabilities. Interviewees and the OHRC (2015; 2018) also reported that students increasingly present with multiple disabilities that must be considered in accommodation planning. This complexity is not captured in the ministry’s current reporting structure, which limits institutions to indicating one disability per registered student.⁹

Interviewees also noted that students often seek support to overcome barriers caused by circumstances that extend beyond their registered disability, such as studying internationally, financial concerns, single parenting, grief and other social determinates of health. For example, an international student seeking accommodation for an ADHD diagnosis may arrive in Ontario

⁹ Previous ministry templates did not capture the number of students who received OSD supports and services for multiple disabilities and the total number of disabilities accommodated (for students with one or multiple disabilities).

without access to necessary medical treatment and with additional undiagnosed disabilities; they may also develop mental health concerns while studying in Canada. Cases like these require multiple services and complex, individualized accommodation strategies, which are time- and resource-intensive for OSD staff.

Interviewees also described the challenge of accommodating students across a wider range of learning environments. Students may enrol in a mix of online, hybrid and in-person courses during a single term. Many participate in experiential and work-integrated learning (WIL) opportunities as preparation for their transition into the labour market (Gatto et al., 2021a; Gatto et al., 2021b; Government of Ontario, 2021). When learning environments extend beyond the traditional classroom, there are often additional layers of complexity to students' accessibility needs, which increases the time, effort and skills required from OSD staff to provide students with appropriate accommodation strategies.

The current service model for supporting students with disabilities is unsustainable.

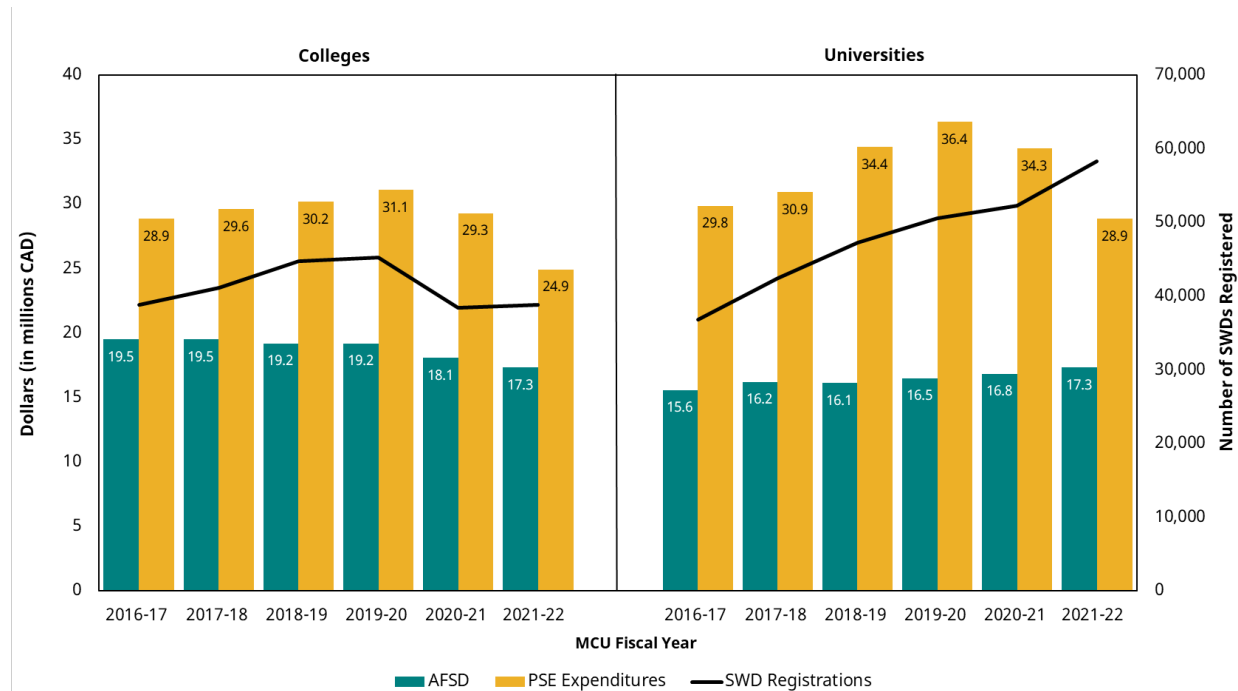
Interviews and ministry data suggest that student accessibility needs are outpacing the services that OSDs can reasonably and sustainably provide. The current service model for supporting students with disabilities requires developing accommodation plans one student (and/or one course) at a time as per OHRC (2004; 2018) guidelines. All steps in the process of individualizing accommodations — assessment, consultation and developing learning plans — are time- and resource-intensive. As institutions see more students with evolving and multi-layered needs — and as students engage in learning across multiple settings, using ever-changing technology — the breadth of services and resources needed to provide basic accommodation services increases.

Despite steep increases in OSD registrations over the past six years, AFSD/SAWD funds did not increase substantially from 2016 to 2022.¹⁰ Excluding three one-time top-ups of \$16 million, \$17 million and \$2.5 million from 2020-21 to 2021-22 for pandemic-related support, AFSD/SAWD yearly funding was static during the period examined. While OSD registrations rose and accommodation needs became more complex, per-student MCU funding actually decreased 23% between 2016 and 2021. Figure 3 shows AFSD/SAWD funding and reported institutional expenditures alongside OSD registrations annually between 2016 and 2022.

¹⁰ Funding allocations for the other special purpose grants cannot be examined due to data unavailability. Please refer to Table 3 in Appendix A for more detail regarding funding distributed through other special purpose grants.

Figure 3

Annual MCU AFSD/SAWD Funding and Institutional Expenditures to Support Students with Disabilities, 2016 to 2022



Source: MCU (2013–2022a; 2013–2022b).

Note: Figure 3 presents the number of students/apprentices who registered with OSDs, MCU’s AFSD/SAWD funding allotments, and expenditures reported by colleges and universities to support students with disabilities annually from 2016 to 2022.

While AFSD/SAWD funding was relatively stable, college and university expenditures to support accessibility needs increased from \$59 million in 2016 to \$67 million in 2019. Increasing institutional investments align with increases in OSD registrations. Government funding to colleges was consistently higher than that for universities from 2016-17 to 2020-21 despite universities reporting much greater PSE expenditures and servicing a higher number of registered students. Funding level differences across the sectors were due in part to MCU’s AFSD/SAWD allocation formula, which were based on the percentage of OSD-registered students. Colleges have historically enrolled a higher proportion of students with disabilities (see Figure 1).

Overall funding for universities increased between 2016-17 and 2020-21, but per-student funding for universities decreased relative to college per-student funding over the same period. In 2016-17, university per-student funding was 84% of what colleges received; in 2021-22, it was only 67%. Table 2 shows that per registrant, universities received lower levels of MCU support from 2016-17 to 2021-22.

Table 2

AFSD/SAWD Funding and Institutional Expenditures per OSD Registrant in Public Colleges and Universities Annually from 2016 to 2022

	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22
AFSD/SAWD Funding (\$)						
Colleges	503	474	429	425	470	446
Universities	423	382	341	326	322	297
Institutional Investment (\$)						
Colleges	744	719	674	688	762	642
Universities	810	729	729	719	656	495

Source: MCU (2013–2022a; 2013–2022b).

Note: This table shows the annual AFSD/SAWD funding distributed, and institutional expenditures made in dollar amounts per OSD registrant from 2016 to 2022.

Universities also reported much greater per-student institutional expenditures. Reported expenditures underrepresent total institutional investment due to the restrictive definition of eligible expenses under the funding program. Institutional supports for students with disabilities are concentrated in OSDs but are also distributed across program areas: students may seek advice or resources through career services offices, experiential learning units, academic advising or course instructors. Many institutional investments made to acquire and improve accessible technology, equipment and learning spaces are not reported.

During the pandemic, institutional expenditures for colleges and universities combined (defined as those eligible under the funding program) decreased to \$54 million. While it is unclear why institutional expenditures decreased markedly during the pandemic, interviewees suggested that staffing shortages and service delivery changes reduced some institutional costs. For example, institutions spent \$3.5 million less on specialized exam and testing supports and \$8.8 million less on salaries for OSD staff, learning strategists and assistive technologists in 2021 relative to 2019. Post-pandemic data are required to evaluate whether institutional expenses exceeded pre-pandemic levels in the 2022-23 academic year.

Many interviewees shared that their OSDs have been operating short-staffed; more personnel are taking leaves of absences, overall turnover is high and training and recruiting new staff with the required expertise is challenging. Existing staff are carrying “extraordinarily high” caseloads, often with over 300 students per staff member, to keep up with the growing demand for services. Interviewees reported that staff caseloads and service wait times are continually increasing. Pressure on staff to meet student needs often leads to elevated stress levels and burnout. Institutional representatives report that the current delivery model is unsustainable given both the swelling demand for services and the lack of resources necessary for meeting this demand.

OSDs are adapting and expanding service delivery to meet demand.

Faced with increased demand and staffing shortages, OSDs have prioritized streamlined approaches to service provision. Some have expedited the intake process by providing accommodations without requiring in-person meetings with students or follow-up as students progress through their programs. While this approach may expedite the accommodation process, students receive less individualized and appropriate support (Harrison & Armstrong, 2022; Weis & Waters, 2023). OSDs have relied on technology such as speech-to-text software, screen readers and adaptive computer hardware to replace costly alternatives like human notetakers. Several interviewees reported using a variety of tools to reduce administrative and service loads, including group and peer-to-peer support sessions to serve several students at once; long-term accommodation strategies to reduce or eliminate students' need for additional appointments; and extended hours or "triage" models to reduce wait times. Interviewees also stressed the importance of instructional strategies such as Universal Design for Learning (UDL) that enhance accessibility for learners with and without disabilities. Though UDL will not meet all students' needs, it can reduce reliance on individual accommodations and ease pressure on OSDs.

MCU's funding model and institutional reporting requirements can be streamlined and enhanced.

MCU support for students with disabilities is currently distributed through 10 different special purpose grants, each with its own reporting requirements. The intricacies of the various programs and annual reporting requirements are administratively burdensome, and MCU's funding model and annual reporting templates are not aligned with the complexity of students' accessibility needs and OSD services. AFSD funding allocations are calculated annually using numerical data from reports in previous fiscal years. Though individual institutional funding can change annually, the amount of AFSD funding available in the sector is fixed. Allocating a fixed amount of funds and using a model that relies solely on retrospective data are not optimal processes in an environment where student needs are rapidly growing and evolving.

Current reporting requirements capture only high-level service inputs, such as the number of students registered, the number of assessments completed and the amount of funding administered. Student registrations are limited to a single disability type, despite the fact that many students present with co-occurring disabilities. Annual reports do not include outcome or impact data. The National Educational Association of Disabled Students (2018), the OHRC (2018) and the PSE-SDC (2022) agree that to better understand the experiences and outcomes of students with disabilities, government should collect and publicly report on graduation rates, time to graduation and program non-completion rates.

Some institutions collect more nuanced data that could be incorporated into reporting to reveal more about the evolving landscape. Most institutions survey students on their experiences using OSD support services. Many monitor service efficiency by tracking staff caseloads, service wait times, and additional expenses that are not covered through the AFSD or other special purpose grants. Some institutions gather student-level outcomes data, such as GPA, graduation rates, time to graduation, or year-to-year retention linked to additional information about student needs, such as disability type(s), income, international status and/or records of service usage. While staff acknowledge the utility of using student-level administrative records and outcomes to

inform their operations, there is little capacity to examine these data. Through consultation with colleges and universities, MCU can learn from institutional data collection activities to further improve upon annual reporting templates.

Recommendations and Conclusion

HEQCO's analysis of annual funding reports and interviews with OSD representatives demonstrate the rapid growth in student accommodation needs and the increasing complexity of meeting support demands. Colleges and universities supplement MCU funding in order to meet their legal requirements and ensure that their students have opportunities for success. In the absence of increased government support to match demand, OSDs are implementing new tools and delivery models that can have a beneficial impact for all students. While these strategies can help relieve bottlenecks, they cannot eliminate them entirely.

Institutional adaptations, such as moving to a UDL model to improve program sustainability, do not automatically generate cost savings for OSDs or for institutions more generally. Fostering institution-wide shifts in learning strategies requires working closely with departments across campuses to garner staff and faculty support and cultivate the expertise necessary to deploy training broadly. Efforts like these are resource-intensive and are not currently supported through special purpose grant funding. This work will continue to evolve as course delivery shifts to include more online and hybrid options. Institutions have already increased their investments and resources to support these efforts.

Guided by findings from this investigation, HEQCO offers the following recommendations to MCU.

Increase funding to institutions.

MCU and interview data show that the demand for accessibility services continues to grow. These data, in combination with the legal requirement for institutions to provide supports, confirm that accessibility services are part of institutional business, not add-ons or temporary initiatives. Institutions have evidenced their ongoing commitment to supporting accessibility through investments to address growing demand. HEQCO echoes the OHRC and PSE-SDC in recommending that government increase funding distributed directly to all institutions to enhance and expand available services and supports.

MCU should implement a permanent and sustained approach to funding increases rather than one-year top-ups or project-based funding. Such an approach would reflect the expanding need for accommodation and accessibility services and would allow institutions to make strategic, longer-term decisions about supports and service models. For example, funding increases could be triggered by the number or proportion of student registrations with OSDs, including multiple registrations for students who present with more than one disability. As government considers funding increases, it should ensure that per-registrant funding is consistent across the sectors.

Consolidate funding programs and distribution.

Government's variety of special purpose grants reflect an outdated understanding of student accessibility needs, where different disabilities are treated as discreet types.¹¹ Students

¹¹ The current approach has evolved and prioritizes differentiation of funds. While it is important to signal that disabilities are not uniform, this understanding should be balanced with a streamlining priority.

increasingly present with multiple disabilities and accommodation needs, and these may shift over their academic careers. Government's funding mechanism can better reflect this reality.

Government should consolidate its programs to reduce the number of grants. For example, government could consolidate AFSD, SAWD and IF (for institutions that receive IF directly). Non-TPA grants should be shifted from special purpose envelopes to operating grants. Including accessibility funding in operating grants would simplify funding distribution and reporting requirements; would provide stability and opportunity for longer-term planning; and would signal that accessibility is a government and system priority. Institutions should continue to report on accessibility as part of their accountability commitments and as required by government.

Revise annual reporting to capture data related to the complexity of required supports and program impacts.

Government should work with college and university disability service provider associations to develop new reporting templates. Enhanced data collection from institutions will help clarify caseloads, the scope of the supports that students need, and how grants impact student outcomes. The ministry primarily understands program impacts by tracking student registrations by disability and reported OSD spending. Reporting related to students with multiple disabilities and staff caseloads would offer a clearer picture of accessibility needs, the demand for services and the pressures experienced by OSD staff. These data should then be used to inform future funding allocations. MCU should explore the impact of these grants in a broader way, with a focus on outcomes, and by collecting data on graduation rates, time to graduation, access to WIL opportunities and/or graduates' labour market outcomes. Funding levels should reflect institutional efforts to collect and report these data.

This report represents a step toward understanding the initiatives and activities undertaken across Ontario's PSE sectors to address student accessibility needs. Findings and recommendations included in this report echo recommendations advanced by PSE-SDC. While the pandemic brought new opportunities for innovation through technology and universally accessible learning, it also brought additional accessibility hurdles (PSE-SDC, 2022). As the learning landscape and students' needs continue to evolve, additional resources are required to adapt the system and meet students' needs in a sustainable way. Considerations around funding distribution should be complemented with improved data collection processes. Additional data related to demand and outcomes can inform and further enhance the accessibility and accommodation services offered across Ontario.

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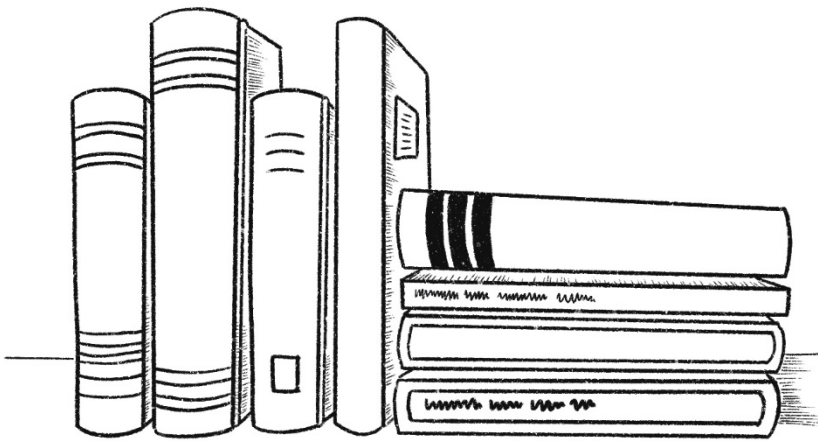
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Accessibility Services at Ontario Colleges and Universities: Trends, Challenges and Recommendations for Government Funding Strategies

Appendix

Appendix A: Overview of the Ministry’s Special Purpose Grants

Appendix A synthesizes MCU funding details for programs that support students with disabilities. These details were gathered from annual report templates and MCU memos. Table 3 summarizes the ministry’s 10 special purpose grants and transfer payment agreements (TPAs). Each grant is allocated towards specific activities to ensure that services are available for students according to particular support needs.

Table 3

Special Purpose Grants and Transfer Payment Agreements (TPAs) That Support Postsecondary Students with Disabilities

Fund Name	Activity Types and Determining Allocations	Funding in 2022-23 (\$M)	Recipients
Accessibility Fund for Students with Disabilities (AFSD)	<p>The AFSD is an ongoing special purpose grant that supports the operation of OSDs that provide a wide range of services and accommodations. These include implementing transition programming, arranging note-taking support for students with visual impairments, providing access to computers and appropriate technological learning aids and working with faculty to arrange extra time to write tests and exams for students with disabilities.</p> <p>The federal government funds a portion of the AFSD through the Labour Market Agreement for Persons with Disabilities, a federal-provincial cost-sharing agreement to support programs that increase the employability of persons with disabilities.</p>	32.79	All public colleges and universities
Interpreter Fund (IF)	The IF is used to partially reimburse the costs of interpretation and related services for full- and part-time students who are deaf, deafened and/or hard of hearing. Funds are used for interpreters/intervenors, real-time captioning and/or computerized notetakers. The fund is for colleges outside the Greater Toronto Area (GTA) and all public universities.	10.9	All public colleges outside the GTA and all public universities
Support Services for the Hearing Impaired (SSHI)	SSHI is an ongoing special purpose grant provided to George Brown College to deliver interpreter, intervenor and notetaking services to deaf, deafened and hard-of-hearing students who attend Centennial, George Brown, Humber, Seneca and Sheridan college.	Included as part of the IF	George Brown College
Support for Apprentices with Disabilities (SAWD)	SAWD is an ongoing special purpose grant that assists colleges with costs related to providing accommodations, assessing disabilities and modifying equipment for people with disabilities who participate in apprenticeship programs, pre-apprenticeship programs and Ontario Youth Apprenticeship Programs.	2.7	All public colleges

Fund Name	Activity Types and Determining Allocations	Funding in 2022-23 (\$M)	Recipients
Learning Disability Initiatives – Assessment Resource Centres	This funding is provided through an ongoing TPA to co-ordinate support for research and assessment services for students with Attention-Deficit Hyperactivity Disorder (ADHD) and other non-visible learning differences. This grant is subdivided into three resource centres to co-ordinate on behalf of their respective regions: the Regional Assessment and Resource Centre (RARC) distributed to Queen’s University, the Northern Ontario Assessment and Resource Centre (NOARC) distributed to Cambrian College and Centre francophone d’évaluation et de ressources de l’Ontario (CFERO) distributed to Collège Boréal.	2.34	Cambrian College, Queen’s University and Collège Boréal
Rick Hansen Foundation	This funding is distributed to the Rick Hansen Foundation through a TPA (2022–2024). It supports curriculum development, instructor training and marketing for the Rick Hansen Foundation Accessibility program (a professional designation).	1.87	The Rick Hansen Foundation
Print Alternate Learning Materials (PALM)	PALM is an ongoing special purpose grant. It funds an online service that helps postsecondary students with perceptual disabilities obtain their textbooks in the alternative formats they need. This grant was formerly known as Alternative Education Resources for Ontario.	1.55	All public colleges and universities
The David C. Onley Initiative at Carleton University	This funding is provided by TPA (2021–2024) to Carleton University to work in partnership with the University of Ottawa, La Cité and Algonquin College to pilot learnings, strategies and best practices from the first phase of the David C. Onley Initiative. It provides information about the feasibility of implementing this collective impact strategy across the sector, and its potential to improve employment outcomes for graduates with disabilities.	1	Carleton University
Teachers for the Deaf and Hard of Hearing (TDHH)	The TDHH grant is an ongoing TPA to support the delivery of the Deaf and Hard of Hearing Teacher Education Program by the Faculty of Education at York University. In this program, teachers learn how to instruct elementary and secondary students who are deaf and/or hard of hearing.	0.73	York University
Action Plan to Strengthen Transitions for Students with Disabilities	This funding is for pilot projects seeking to strengthen transitions to PSE for students with disabilities, with a focus on students with autism spectrum disorder (ASD). Activities include outreach to high schools to exchange information; support services for students with ASD; and workshops for faculty and families. Funding is provided through an ongoing TPA.	0.58	York University and Algonquin College

Source: MCU (2023c)

Note: This table describes Ontario’s 10 special purpose grants and Transfer Payment Agreements (TPA), including funding levels in 2022-23, that support postsecondary students with disabilities.

Grants are allocated in three ways: through a distribution formula, through expense claims and on a per-project basis. The AFSD includes a base amount to each institution and then applies an enrolment-based model to allocate remaining funds across institutions. The amount each institution receives is calculated annually so varies year to year.

The IF uses a reimbursement model where institutions claim expenses through annual reports and the ministry distributes funding to reimburse these costs. Funding is allocated towards eligible expenses on a prorated basis to institutions in the sector. Colleges and universities submit a report each February that includes a combination of actual and anticipated expenditures, and the ministry uses these reports to allocate IF before the end of the fiscal year.

Funding for PALM and SSHI is also allocated through reimbursement claims. Unlike the IF, these grants are distributed to central providers that coordinate services and report on behalf of the sector. Funding for RARC, NOARC and CFERO are administered through a TPA and as such are fixed amounts year over year. Comprehensive information regarding PALM, RARC, NORARC and CFERO funding was not available for the preparation of this report.

The ministry also holds TPA agreements that provide short-term funding for specific initiatives in the sector: The David C. Onley Initiative, the Rick Hansen Foundation, the Action Plan to Strengthen Transitions for Students with Disabilities, and TDHH. Unlike the other funding allocation models, these agreements are made between the ministry and institutions and/or organizations to carry out a pilot project or program.

Appendix B: OSD Registrations by Disability Type

Appendix B provides an overview of student OSD registrations by disability type for colleges and universities (see Tables 4 and 5). Table 4 presents the number of college students and apprentices registered at OSDs by their principal disability from 2016-17 to 2021-22.

Table 4

Number of College Students and Apprentices Registered at OSDs by Principal Disability from 2016-17 to 2021-22

	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22
All Physical Disabilities	6,644	7,101	7,556	7,421	5,934	5,855
Chronic Illness, Systemic, Medical Illness	3,181	3,316	3,451	3,383	2,733	2,547
Mobility	1,099	1,176	1,244	1,186	932	908
Deaf, Deafened, Hard of Hearing	779	791	747	677	603	600
Acquired Brain Injury	700	789	920	882	745	783
Low Vision, Blind	401	442	403	400	385	349
Undisclosed Physical Disability	57	125	356	238	142	179
Other	423	462	429	654	387	482
All Nonphysical Disabilities	30,102	32,370	34,982	35,351	31,010	31,388
Mental Health	10,601	11,753	13,470	14,312	12,377	12,673
Learning Disability	11,797	12,164	12,391	11,058	9,648	9,154
Attention-Deficit/Hyperactivity Disorder	3,938	4,486	4,761	5,082	4,977	5,941
Autism Spectrum Disorder	1,557	1,828	1,902	2,004	1,760	1,757
Undisclosed Nonphysical Disability	735	972	1,096	1,409	1,308	939
Addiction	16	18	28	90	44	14
Other	1,457	1,149	1,332	1,395	896	910
Either Physical or Nonphysical Disability	2,020	1,681	2,216	2,412	1,453	1,602
All Students and Apprentices with Disabilities	38,766	41,152	44,754	45,184	38,397	38,845

Source: MCU (2013–2022a; 2013–2022b).

Note: This table provides the number of annual Ontario college student and apprentice OSD registrations by disability type from 2016 to 2021.

Table 5 presents the number of university students registered at OSDs by their principal disability from 2016-17 to 2021-22. In contrast to colleges, increases in university registrations continued through the pandemic.

Table 5

Number of Ontario University Students Registered at OSDs by Principal Disability Annually from 2016-17 to 2021-22

	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22
All Physical Disabilities	8,425	9,479	10,265	10,381	9,977	10,063
Chronic Illness, Systemic, Medical	3,722	4,181	4,423	4,508	4,591	4,768
Mobility	1,740	1,977	2,138	2,128	1,680	1,612
Deaf, Deafened, Hard of Hearing	598	668	708	750	757	740
Acquired Brain Injury	1,589	1,885	2,111	2,251	2,015	1,933
Low Vision, Blind	484	496	547	534	538	565
Undisclosed Physical Disability	115	51	86	136	135	144
Other	177	221	252	344	261	301
All Nonphysical Disabilities	27,826	32,096	35,602	38,421	41,372	45,867
Mental Health	13,535	16,403	18,748	20,635	21,947	23,874
Learning Disability	7,618	8,120	8,427	8,498	8,546	8,321
Attention-Deficit/Hyperactivity Disorder	5,489	6,182	6,785	7,395	8,801	11,375
Autism Spectrum Disorder	856	982	1,091	1,134	1,236	1,452
Undisclosed Nonphysical Disability	133	251	282	523	456	358
Addiction	7	5	7	7	13	9
Other	188	153	262	229	373	478
Either Physical or Nonphysical Disability	580	801	1,357	1,509	917	2,315
All Students with Disabilities	36,831	42,376	47,224	50,581	52,266	58,245

Source: MCU (2013–2022a; 2013–2022b).

Note: This table provides the number of annual Ontario university OSD registrations by disability type from 2016 to 2022.

Appendix C: Interview Questions

Interview questions for college and university OSD representatives and special interest groups are listed below. Minor changes were made in some cases depending on interviewee role, background and/or institution/organization type. Interview responses were kept confidential and coded using NVivo software.

1. How have student accessibility needs changed at your institution over the last decade?
 - a. What are the most pressing accessibility needs at your institution currently? For students? For staff? For faculty?
2. How has your institution adapted accessibility services over the past decade to meet evolving accessibility needs?
 - a. What is the biggest challenge to offering comprehensive accessibility supports at your institution?
 - b. Could you talk about some innovative approaches or programs you have developed in recent years?
3. How does your institution assess the effectiveness of its accessibility services?
 - a. Are you tracking the use of accessibility services? If so, how?
 - b. Are you measuring how student use of accessibility services relates to their postsecondary outcomes and experiences? If so, how?
4. How do the ministry's special purpose grants contribute to the accessibility services your institution offers?
 - a. How does your institution build on those investments to create comprehensive accessibility services?
 - i. Does this require additional financial investments from your institution over and above those provided through the ministry's grants? How has this changed over time?
 - b. Is there a different funding model that would enable your institution to deliver comprehensive supports for students?
5. The ministry is considering how to reduce reporting burden and streamline the grants that fall under the students with disabilities file. Do you have any recommendations?