CADDAC
CENTRE FOR ADHD AWARENESS, CANADA

K to 12 Ontario Educational Standards Initial Recommendation Report Feedback

The Centre for ADHD Awareness Canada, CADDAC, is a national charity dedicated to improving the lives of children, adolescents and adults with ADHD and their families. After years of advocating for students with ADHD in Ontario, CADDAC is delighted to have this opportunity to respond to the K to 12 Ontario Educational Standards Initial Recommendation Report. We have followed AODA's lead in breaking the report into main themes and have responded to the themes that we feel affect our students with ADHD. We are also encouraging families of children with ADHD in Ontario as well as medical and educational professionals in the field of ADHD to share their feedback. Data and quotes from a recent survey on Ontario education by parents of students with ADHD are shared in italics.

Theme 1: Ensure That Ontario's Schools Effectively Serve All Students with Any Kind of Disability

CADDAC agrees that all disability-related education efforts should extend to all students with any kind of disabilities, as disability is defined in the Charter of Rights, the Ontario Human Rights Code, and the Accessibility for Ontarians with Disabilities Act and not just to students recognized in the categories of exceptionalities.

This is the most important barrier that our students with ADHD face in the Ontario Education system. Students with ADHD in Ontario experience great inequity and explicit discrimination due to the exclusion of ADHD in the categories of exceptionalities. Students with ADHD are barred from receiving an IPRC designation for their ADHD, thereby denying recognition of their disability although ADHD is clearly recognized as a disability by the Ontario Human Rights commission. They may even be denied an IEP barring them from receiving accommodations and special education resources. The lack of recognition of ADHD as a disability has also resulted in students with ADHD being unfairly disciplined for their medical impairments.

In the recent CADDAC parent survey, 92% of parents believed that students with ADHD being denied recognition as an exceptional learner was a Human Rights violation.

"Due to the school board not officially recognizing ADHD and all the associated challenges, co-morbidities, executive function challenges and social impacts, it creates a lack of support which undermines basic human rights for students. My daughter no longer believes in herself, her abilities and has been let down, insulted, humiliated by too many teachers to name. Lack of understanding and support starts with the government and the ministry of education, and the school boards. It needs to be a priority before more children fall through the cracks of the system."

Theme 2: Training on Disability Accessibility for Everyone Involved in Ontario's Education System

CADDAC strongly agrees that the Ministry of Education, boards, schools and Faculties of Education responsible for teacher education should ensure that teachers are thoroughly and effectively trained on how to teach students with disabilities. CADDAC also agrees that school boards should train teachers and staff, students and parents that the inclusion of and full participation by students with disabilities is essential and that the Ministry provide models for this training.

Their lack of knowledge that ADHD is a significant learning risk and the dearth of training our Ontario teachers receive on how to effectively teach students with ADHD means that few students with ADHD receive appropriate accommodations and insufficient effective teaching strategies are implemented.

In a recent survey of on Ontario Education 45% of parents felt that their child's principal and teacher did not have adequate knowledge about ADHD with another 20% being unsure. Between 50 to 60% of parents felt that this lack of knowledge lead to poorer academic outcomes for their child, a poor school experience and negative consequences to their child's mental health and self esteem.

"*When teachers understand, they can support and my children benefit. When they do not understand ADHD, the consequences to my children's self esteem, happiness, what they are able to learn - all suffer. It's heartbreaking."*

"Its entirely luck of the draw and it should not be. Its a disservice to Ontario's students that teachers are so poorly trained about what ADHD really is. They have information that is at least 20 years old."

Theme 3: Removing and Preventing Digital Disability Barriers for Ontario Students

CADDAC agrees that all barriers to accessing digital material should be removed. Many students with ADHD find it easier to work in a digital format, while others find this format more difficult. Therefore, whichever format is preferred should be made easily accessible.

Theme 4: Ensuring Accessible Curriculum, Assessment and Instruction

CADDAC agrees that all students with disabilities should have access to the methods of instruction and assessment that negate barriers to their learning and assessment of the knowledge they have obtained. We also agree that the Ministry of Education should develop tools to help school boards implement these requirements and designate an office or person with responsibility for the ongoing review of the removal of accessibility barriers.

While students with ADHD may not required extensive alterations to teaching and assessment methods those that they do require are essential and need to be individualized through and IEP.

"My son has always been a keen learner and wants to know way more than being taught but there has never been an opportunity for him to use his skills and knowledge to learn. The same message drilled into him was to complete assignments that were not an interest to him, too challenging to do

independently without strategy and it continued to reinforce how 'incapable' he is at learning what is being taught."

Theme 5: Substantially Strengthening Individual Education Plans (IEPs)

CADDAC agrees that all student with a disability should be entitled to an IEP if they, their family or the school thinks one would help. The school should not have the ability to deny an IEP if they disagree with the parent or medical professional's opinion. An IEP should document all the measures for the student's disability-related accommodation in detailed easy to understand language, that will allow parents to monitor and hold schools accountable in their implementation. In recent years, IEPs have become less detailed, vague and full of educational buzz words that parents seldom understand.

CADDAC also agrees that the implementation of IEPs should be periodically audited to ensure that the needs of students with disabilities are being met.

Students with ADHD in some schools and boards are routinely refused an IEP because ADHD is not included in a category of exceptionality, it is not school policy to give IEPs to students with ADHD, or the school feels the student is not "impaired enough" to receive an IEP even though parents and medical experts strongly feel otherwise. In other schools and boards, students with ADHD with similar impairments do receive IEPs. Some boards are removing IEPs for students with ADHD once they enter high school while other boards are refusing IEPs for students in early grades. This has resulted in inconsistency, lack of access to special education resources and accommodations and human rights violations for students with ADHD across Ontario.

In addition, if the Ministry of Education in Ontario or school boards suggest that IEPs be substituted with other types of documentation such as, student learning plans SLPs etc. it must ensure that the same legal rights apply to these alternative documents.

"When I requested an IEP, I was told by his high school that children with ADHD do not qualify for an IEP any longer and that my child and I (as a parent) needed to request accommodation from each teacher each semester instead. The teachers were frustrated by this, as they would usually look for an IEP prior to me contacting them to request accommodation and, finding nothing, assumed that my child was simply uninterested and problematic. It was a ridiculous burden on me to contact four different teachers each semester and to keep each of them updated when, for example, he had anxiety attacks."

Theme 6: Expanding and Strengthening Parent and Student Participation in the Accommodation of Students with Disabilities

CADDAC agrees that all parents of students with disabilities should be informed of all programs, services, supports and accommodations available for students with disabilities and be informed on how to request or advocate for them. Parents also need to be informed on how to request changes to the student's placement, program, supports, services or accommodations, or to raise any concerns they may have about the school and board meeting their child's disability-related education needs.

School boards should supply a system navigator to assist parents in getting their child's needs met and allow parents access to a swift, fair, effective internal appeal within the school board if they are unhappy with the current supports supplied. When moving school all accommodations should be remain intact unless a school board can show just cause for the reduction of accommodations.

"The principal was always about what they can't do for him and never what they can do and that resources are reserved for people who need them. Also, that she has to be careful what details are put in the IEP because they can't guarantee the teacher will do them. Never was it about meeting the needs of the child. "

Parents of students with ADHD find the system of accessing accommodations for their children confusing and arbitrary. They are not informed about possible programs and resources, informed of their child's rights to accommodations according to the Ontario Human Rights Commission nor allowed access to any easy path to voice their concerns when their child is denied these resources and rights.

"Not only do they not think ADHD is anything, they keep telling me she's fine, we don't see a problem and constantly brush away my concerns, remove my daughter (without my consultation) from the waitlist at school for services and keep telling me to get private help!"

Theme 7: Access for Students with Disabilities to Timely Professional Assessments Needed for Disability Accommodations

CADDAC agrees that school boards need to improve the access to timely assessments required to understand a student's needs and that it is their duty to accommodate until such an assessment can be done.

Students with ADHD have frequently been denied psychoeducational testing because the school believes that the student's struggles are entirely due to ADHD and can be "fixed" with medication.

"Although concerns were raised early, from Kindergarten, his teachers claimed they could not do anything until he was 2 years behind academically."

"In primary school while trying to get a diagnosis- the teacher and principal were hostile and blamed our parenting for behaviour- we had to pay for individual testing outside of school with ADHD diagnosis before they would discuss special needs."

Theme 8: Reforming the Process for a School Board Identifying and Making the Placement of Student with Disabilities

CADDAC wholeheartedly agrees that the current IPRC system needs to be reviewed, reformed or replaced with a system that is fair and swift. The current system is confusing, intimidating and discriminatory.

CADDAC strongly believes that the current system blatantly discriminates against students with ADHD by excluding ADHD from its categories of exceptionalities. Students with ADHD, a neurodevelopmental disorder with similar impairments to its sister disorders of Autism and learning disabilities, are most often denied recognition as exceptional students unless they have an additional disability that falls within one of the categories. Due to this, students with ADHD are denied special education resources and accommodations, teachers are not taught ADHD teaching strategies and students with ADHD are unfairly stigmatized and punished for their medical disability.

In the recent survey over 80% of parents believed that their child's consequences and experiences fluctuated year to year but directly coincided with the teachers' and principals' understanding of ADHD and 72% believed that the consequences were a direct result of the school staff's misconception or misunderstanding of ADHD as a disability.

CADDAC suggests two options. If the categories are kept, they must be broadened to encompass all neurodevelopmental disabilities and medical disabilities. The Communication Category should include a subcategory of all neurodevelopmental disorders and the Physical Category should be changed to a Medical Category, with a subcategory for mental health. The behaviour category is not an option under which students with ADHD should ever be recognized. ADHD is not a behaviour disorder.

Alternatively, Ontario could move to a system of inclusion that no longer uses categories and simply recognizes the needs of all students with disabilities regardless of what that disability is. An inclusive special education system does not necessarily mean total classroom inclusion. However, if this is implemented, Ontario must learn the lessons of other provinces who have implemented complete classroom inclusion without increasing classroom staffing and supports and reducing class sizes. These provinces are now experiencing a significant backlash from educators and parents.

Theme 9: Ministry of Education and School Boards Should Each Embed Accessibility Oversight in Their Operations

CADDAC agrees that the Ministry of Education should designate an office or role, such as an Assistant Deputy Minister, responsible for achieving a barrier-free and accessible school system for students with disabilities, as well as, an Ombudsman to oversee complaints regarding disability-related needs of students with disabilities. In addition, the Ministry should annually audit school boards for their ability to fairly and adequately serve students with disabilities.

Theme 10: Recommendations Regarding Disability-Specific Needs

CADDAC strongly believes that an education advisory committee should be established and include stakeholders from the education sector, Ministry of Children, Community and Social Services, Ministry of Health, parents and individuals for <u>all</u> neurodevelopmental disabilities and not just Autism. Or, if an advisory committee is established for Autism alone, consistent with

the recommendations from the Ontario Advisory Panel Report (2019), an additional committee should also be established for ADHD and other N-D disorders. To do otherwise would be discriminatory.

Since ADHD has significant socioeconomic impacts, falls under the Ministry of Health's mandate and has far too long been ignored by the Ministry of Children, Community and Social Services, as well as, other ministries, it is imperative that these recommendations do not also discriminate against students with ADHD. Abundant research indicates that ADHD shares many of the same genes, symptoms, impairments and learning risks as Autism while having higher incident rates.

Theme 11: Reducing the Exclusions/Refusals to Admit to School/Reduced School Hours

CADDAC agrees that exclusions should be reduced and if possible, eliminated. If students are excluded the duration should be minimal and the family should be informed why the exclusion is occurring and how long it will last. We agree that the excluded student would have a right to receive their education while excluded from school. Students should have a right to a fair process before, during and after an exclusion from school and school boards should be mandated to track and make public data on how often students are excluded from school.

Theme 12: Improving Collection of Data on Education of Students with Disabilities

CADDAC agrees that the Ministry and school boards need to track more data on students with disabilities. It has come to CADDAC's attention that the minimal research now done and data captured on students with disabilities (such as the impact of covid on students with disabilities) excludes students who are not recognized as having disabilities under the categories. Therefore, no data on students with ADHD is being captured.

Theme 13: Addressing Barriers facing Students with Disabilities in Social Realms

CADDAC agrees that all students with disabilities be offered the opportunity to participate in social activities in connection with school. This includes, the use of accessible locations and providing staff assistance to ensure that students with disabilities can socialize and be free of bullying.

Theme 14: Addressing Disability barriers in School Transportation

CADDAC agrees that all students with disabilities have access to transportation and that drivers are properly trained to accommodate each student's disability needs.

Theme 15: Addressing Disability Barriers to Experiential / Co-Op Learning

CADDAC agrees students with disabilities should be able to fully participate in experiential learning programs and co-op learning opportunities.

Theme 18: Accessible Transitions for Students with Disabilities

CADDAC agrees that school boards should assist in making translations easier for students with disabilities by creating the role of the Transition Facilitator/Navigator to work with students and their families in collaboration with school staff, and community agencies to develop and carry out transition plans. CADDAC also agrees that siblings of a student with a disability who attends a special education program outside of their home school, should be allowed to attend that same school within that school board, if requested by the family.

Students in Grades 11 and 12 and their parents should be informed, during their IEP review meeting, that their formal professional assessment will need to be updated prior to moving to post-secondary. NOTE: Some high schools continue to incorrectly inform students with ADHD and their parents that they will require a psychoeducational assessment and report prior to entering a post-secondary institution in order to access accommodations. In fact, only a physician's report or completion of a medical form need be submitted. Please access Understanding ADHD as a Disability in the Post-Secondary Environment and ADHD Post-secondary Impairment/Accommodation Chart.

Additional Points

When these new standards are enacted, CADDAC believes that additional work needs to be done to shift views on disabilities that have long been ignored by the current categories of exceptionalities. By excluding ADHD from the categories, the Ministry of Education, intentionally or unintentionally, sent a very strong message to educators that ADHD is not a significant risk to learning despite decades of research proving otherwise.

- ADHD, without an additional learning disability, results in:
- lower academic achievement;
- 8 to 10% reduced literacy and numeracy rates;
- significant increased drop out rates;
- fewer years of post-secondary education;
- additional mental health disorders such as anxiety, depression and substance abuse; and
- increased risk of involvement in the justice system, 10 times greater for youth.

Many educators still view ADHD as a behaviour disorder despite an abundance of research that led to the re-conceptualization of ADHD as a neurodevelopmental disorder, like learning disabilities and Autism, almost a decade ago. Because many principals and teachers still misunderstand the behaviours they see as "bad" behaviour, laziness, a lack of motivation or defiance, they do not flag these students as ones who require special education resources.

Due to the lack of recognition of ADHD as a learning risk, few educators in our Ontario education system are adequately trained in how ADHD impacts learning, appropriate teaching strategies and classroom accommodations. They spend their time trying to improve compliance and on task behaviour rather than supporting cognitive impairments, which research informs us will also improve behaviour.

Therefore, CADDAC strongly believes that the Ministry of Education, boards, schools and Faculties of Education responsible for teacher education must make a concerted effort to correct these misconceptions and ensure that teachers are thoroughly and effectively trained on how to teach students with ADHD.