

Submission to the Town Hall on Accessibility

by the

The Ontario Branch of the International Dyslexia Association (ONBIDA)

April 4, 2019

1. Background

1.1 About ONBIDA

The **Ontario Branch of the International Dyslexia Association** (ONBIDA) is a non-profit charitable organization founded in 2004. The branch is operated by volunteers, providing information and support to individuals with dyslexia and their families, as well as teachers, and other professionals.

ONBIDA's parent organization, the **International Dyslexia Association** (IDA) was founded in the 1920s, has 47 branches in the U.S. and Canada, as well as 24 global partners. IDA promotes effective teaching approaches and related educational intervention strategies for people with dyslexia. IDA has published the ***Knowledge and Practice Standards for Teachers of Reading*** which details the knowledge base required for skilled reading instruction for all teachers of reading. IDA's partner organization, the **Center for Effective Reading Instruction**, accredits pre-service and in-service educator preparation programmes that align with the *Knowledge and Practice Standards*.

1.2 Definition of Dyslexia

Dyslexia is a neurologically-based, language disorder that affects word-level reading accuracy, reading fluency, and spelling. It is often described as an unexpected difficulty in learning to read. However, with appropriate instruction, people with dyslexia can learn to read.

1.3 Structured Literacy

IDA has defined evidence-based reading instruction through the *Knowledge and Practice Standards* and named this approach "**Structured literacy**." The **Center for Effective Reading Instruction** (CERI), also issues certifications to individuals who possess the knowledge and skill necessary to implement Structured Literacy practices aligned with the Knowledge and Practice Standards. Structured literacy is not a

proprietary program but rather an approach to literacy instruction characterized by systematic, explicit instruction that integrates listening, speaking, reading, and writing and includes the following elements:

- Phonology (the structure of language across the speech sound system)
- Handwriting
- Orthography (the spelling system)
- Syntax (the structure of sentences)
- Morphology (the meaningful parts of words)
- Fluency
- Vocabulary
- Semantics (the relationships among words)
- Listening and reading comprehension
- Written Expression
- Organization of spoken and written discourse.

This instruction is the basis for developing accurate and fluent reading, comprehension and writing skills.

1.4 Support for Dyslexia Partner Organizations

ONBIDA continues to work closely with and support the advocacy efforts of the grass roots groups Decoding Dyslexia Ontario and Dyslexia Canada.

2. Barriers to Access for Students with Dyslexia in Ontario Public Schools

2.1 Accommodations for Reading Ability vs. Access to Effective Instruction

The focus on accessibility in education in Ontario has largely been on the need to provide accommodations that will allow students to succeed in school when they are unable to read and/or write effectively. While these accommodations are necessary for many students, it is extremely important to know that students with dyslexia can learn to read and write effectively if they are provided with effective *Structured Literacy* instruction.

2.2 Barriers to Access to Effective Reading Instruction

It is the position of ONBIDA that the *Ontario Language Curriculum* and the teaching practices outlined in the *Guide to Effective Instruction In Reading* (Ministry of Education 2003) create systematic discrimination against students with dyslexia and are in conflict with the *Guidelines on Accessible Education* (OHRC 2004) and the *Policy on Ableism and Discrimination Based on Disability* (OHRC 2016). These Ministry documents

and policies do not support the use of *Structured Literacy* instruction that is good for all students but essential for students with dyslexia.

2.3 Barriers in the General Classroom

The Ministry of Education Language Arts curriculum (e.g. Grade 1) has mandated use of the “Three-Cueing System” which lacks direct instruction in the structure of the English language. This approach is based in the belief that children learn to read naturally and do not require direct instruction. ONBIDA’s [Position Statement on Supporting Students with Dyslexia in Ontario Public Schools](#) provides detailed background research and evidence to support ONBIDA’s position that curriculum and instructional approaches mandated by the Ministry of Education create a barrier to receiving appropriate and effective literacy instruction for students with dyslexia.

Students with dyslexia require *Structured Literacy* instruction in order to attain the literacy skills necessary to succeed in school and in life. Indeed, other struggling readers, such as English language learners and those with speech and language delays also benefit from *Structured Literacy* instruction. Furthermore, *Structured Literacy* instruction is appropriate and beneficial for typically able students.

2.4 Inconsistency between Intervention Programs and with General Education Programs

The Ontario Ministry of Education policy states that:

*“School boards, schools, and educators may put intervention strategies in place to support students with learning disabilities through a tiered approach, in which high-quality, **evidence-based assessment and instruction** are systematically provided and respond to an individual student’s strengths and needs.” (PPM8, Ontario Ministry of Education)*

However, the Ministry does not specify what qualifies as **evidence-based assessment and instruction**. This has led to inconsistency and lack of accountability across the province. For example, many school boards continue to use programs based in *three-cueing strategy* such as *Reading Recovery* and *Levelled Literacy Intervention*. Both programs have been extensively researched and no evidence exists that they are effective interventions for students with dyslexia.

Some school boards, recognizing the ineffectiveness of the three-cueing system, have chosen to use intervention programs that offer direct instruction in decoding, such as Empower Reading and Lexia. While these programs do include some of the elements of *Structured Literacy* instruction, not every aspect of

Structured Literacy is adequately addressed. Additionally, the use of proprietary programs such as Empower are problematic as teachers are prevented from sharing the program content with the student's general education teacher. Even when programs allow for content sharing, the general education teacher is required to follow the curriculum and teach the strategies of the three-cuing system. These are the same strategies that the intervention teacher is working diligently to replace with effective word level decoding skills. The result of this disconnect between general education and special education is frustration, confusion and sub-optimal progress on the part of the student.

2.5 Barriers to Access to Effective Intervention Programs

Due to the ineffectiveness of general classroom instruction there is overwhelming demand for literacy intervention programs, resulting in inequitable and untimely access. Access to effective literacy intervention programs varies from:

- **Board to board** - Many school boards continue to use literacy intervention programs such as Reading Recovery and Leveled Literacy Intervention. These programs are not *Structured Literacy* interventions and are ineffective for students with dyslexia. Students with dyslexia in these boards have no access to accessible reading instruction at school.
- **School to School** – Within boards that have chosen explicit-systematic intervention programs access is often dependant on the priorities of the school principal and the training of resource teachers. Additionally, some boards have chosen expensive programs like Empower Reading and allow parent fundraising to cover the cost. In these cases, students in more affluent areas have access to accessible instruction while students in less affluent areas do not.
- **Student to Student** - Finally, within a school, access to these programs often depends on a caregiver's ability to advocate effectively for their student's inclusion and/or the family's ability to pay for private psycho-educational assessments to demonstrate the student's need (and/or private structured literacy tutoring to provide the instruction the student requires).

2.6 Barriers to Access to Regular Classroom Activities due to the Withdrawal Assistance Model

The exclusion of *Structured Literacy* Instruction from the curriculum forces many students with dyslexia to leave their classroom to receive appropriate instruction (if indeed it is available). Many students experience negative social and emotional impacts due to this segregation and pervasive stigma. Additionally, many students are denied the right to fully participate in, and benefit from instruction in other

subjects such as math, science and art, that is happening in the regular classroom while they are removed to participate in intervention programs.

2.7 Barrier to Access due to Lack of Early Identification

There is strong evidence that intensive reading interventions are most effective in preschool, kindergarten or first grade. Early screening for dyslexia is feasible, cost effective, and has been mandated by law in many jurisdictions. This screening is necessary to provide differentiated instruction in the general classroom and identify students requiring appropriate interventions. However, in Ontario early screening for dyslexia is not widely used and the 'wait to fail' model still prevails in most schools. This results in children not being identified with reading challenges until Grade 3 or later, after the window for optimal intervention has closed. Delayed intervention frequently causes lasting negative impacts including:

- preventable literacy impairment and poor academic performance
- reduced educational and employment outcomes including increased risk of incarceration
- low self-esteem
- behavioural problems
- mental health issues including increased risk of substance abuse issues

2.8 Barriers to Access Due to Lack of Recognition of *Dyslexia*

Refusal across Ontario's education system to recognize dyslexia by name as a distinct disorder requiring specific supports and interventions creates a barrier for students and families to access the resources they need to understand and support this life long condition. Additionally, refusing to name this condition creates a barrier for teachers who want to provide appropriate support for students and struggle to find the information and resources required to do so effectively. Ontario Ministry of Education policy is out of step with global trends:

- In the U.S. federal law formally recognizes Dyslexia. In 2015 the U.S. Department of Education issued *Guidance on Dyslexia* that supports the use of the term in schools and on IEPs ([read the statement here](#))
- In the past several years forty-two (42) U.S. states have adopted dyslexia legislation ([see this map from the National Center on Improving Literacy](#)).
- In 2018 the European Union introduced a Dyslexia Charter ([see this article](#))
- In Ireland, dyslexia has been recognized since 2001 and is commonly diagnosed through the National Education Psychology Service (NEPS) ([see this article](#)).

- In the U.K. dyslexia is identified as a disability in the Equality Act 2010.

3. Dyslexia and the Accessibility for Ontarians with Disabilities Act, 2005

3.1 2019 Legislative Review of the Accessibility for Ontarians with Disabilities Act, 2005

ONBIDA's position is further supported by the statements made to the *2019 Legislative Review of the Accessibility for Ontarians with Disabilities Act, 2005*. The report issued by The Honourable David C. Onley stated the following regarding dyslexia:

"The Review was informed that students with dyslexia form the largest cohort of special-education students – approximately 40 per cent. Yet stakeholders say the Ministry of Education has not adopted evidence-based instructional methods that would make learning to read accessible to these students. They believe these methods help all struggling readers no matter what the cause and make learning-abled students better readers.

Moreover, the ministry does not require training of either classroom teachers or special-education teachers in how to identify dyslexia, how to teach evidence-based reading to children, or how to remediate reading in students who are dyslexic. In fact, in 2014, the ministry removed the term "dyslexia" from its policy on the larger category of learning disability, a step that is out of step with global trends. Proposals to make the system more accessible include rewriting the curriculum for the early grades, producing a dyslexia handbook for teachers like the one for autism spectrum disorder, and screening all incoming kindergarten students for risk of dyslexia."

3.2 Meeting the requirements of the Accessibility for Ontarians with Disabilities Act 2005

In order to meet the requirements of the act by 2025, the Ministry of Education must take the following immediate action (as outlined in ONBIDA's *Position Statement on Supporting Students with Dyslexia in Ontario Public Schools*)

- Revise Ministry Policy to recognize and name dyslexia as a specific condition requiring specific interventions. Issue guidance to schoolboards and teachers on the use of the term dyslexia as an equivalent term for learning disabilities that affect word-level decoding and encoding.
- Mandate specific evidence-based literacy screening in kindergarten / early grade 1 for every child, to inform differentiated instruction and identify appropriate interventions.

- Revise the language arts curriculum to use *Structured Literacy* instruction in the general classroom setting.
- Require all special education and withdrawal assistance programs to use *Structured Literacy* interventions that are available to every at-risk student and are re-enforced in the general classroom.
- Support in-service teachers by funding mandatory professional development in dyslexia, and on-going training and coaching in *Structured Literacy* instruction.
- Require all teacher preparation programs to include mandatory courses in *Structured Literacy* instruction that align with the *IDA Knowledge and Practice Standards for Teachers of Reading*.
- Consult with stakeholder groups and scientific experts to create a dyslexia handbook for teachers.

Thank you for giving ONBIDA the opportunity to submit a statement to the Town Hall on Accessibility. We are happy to provide any additional input and/or guidance on literacy instruction and accessible education for students with dyslexia in Ontario.