REVIEW OF STUDENT ACADEMIC ACCOMMODATIONS AND CONSIDERATIONS POLICIES AND PROCEDURES AT QUEEN'S UNIVERSITY

Produced by Patrick Case, Nora Farrell, Tanya Packer & Jeff Preston

Final report, Submitted June 3, 2024

TABLE OF CONTENTS

1 INTRODUCTION

1.1 THE IMPORTANCE OF THIS REVIEW

The context within which this review takes place is vitally important. It is crucial to recognize that the need and demand for increased accessibility is not unique to Queen's or any Canadian University. Evolving human rights expectations, COVID-induced social changes, and an ever-increasing student body advocating for and deserving academic accommodation at all levels of education is presenting a complex and evolving landscape in the post-secondary environment. With no consensus on standards or even best practices, many universities are struggling with the desire to provide disabled students with the tools and environments they need to learn, to succeed and to prosper.

The experiences and aspirations of disabled students themselves and the challenges and contributors to their academic success have been heard by the reviewers. What is clear is that a truly accessible learning environment must be led from the very top of the University and depends on collaboration among faculty, staff and students. The infrastructure that underpins and supports student success - the policy framework, the learning environment, the administration of

accommodation and accessibility services – all were pivotal focal points for this review, as it is only when all pieces of the academic machinery work efficiently and effectively that students have the best institutional pathway to succeed.

1.2 ACKNOWLEDGEMENT

The reviewers respectfully acknowledge Queen's University's courage in initiating a third-party review of its academic accommodation and related policies. We hope this review will support and assist the University in charting a bold path forward.

1.3 RATIONALE FOR USE OF 'IDENTITY FIRST' LANGUAGE

Throughout this report we have chosen to use identity-first language, such as disabled students, as opposed to person-first language, such as students with disabilities, unless we are including a verbatim quotation. We make this choice not as judgement against those who prefer person-first language or to indicate one term is superior to the other, believing it is important to allow disabled people to identify in the ways most meaningful and accurate to their individual experience. For the review team, we employ identity-first language to resist the bifurcation of

disability and personhood actively. We use identity-first language to honour and recognize the intertangled experiences of bodies and identity, seeing disability as a valid and not contested part of someone's personhood. We deploy identity-first language here as a grammatical reminder that "disability" is not just found with(in) the body—people are also *disabled by* environments and systems incompatible with their body/mind's function or ability.

2 CONTEXTS AND BACKGROUND INFORMATION

2.1 LEGAL, SOCIAL AND HISTORICAL CONTEXT

2.1.1 HUMAN RIGHTS

The duty to accommodate disabled students in the provision of educational services is an obligation under human rights law. In Ontario, due to advocacy on the part of communities of disabled people, the duty to accommodate has been expanded to require institutions to move toward full accessibility for disabled students. Making the idea of accessibility real and turning that idea into action – both day-to-day and transforming institutions

overall - requires collaborative engagement, ensuring students themselves are part of the collaboration.

Building a path toward meeting human rights-based, but also moral and ethical obligations to disabled people, involves two broad tasks. First is building and sustaining the capacity to address individual requirements for accommodation. The capacity to accommodate must be constructed through meaningful collaboration with all partners working together on policy and procedure development and daily practice. While keeping front-of-mind the University's legal obligations to disabled students, a consensus approach to accommodation is the path to sustainable success. Second, and most important in the long term, is a focus on transformation, i.e., developing and implementing measures that will move the needle from meeting minimum legal requirements to improving the experience of disabled students in substantive ways. This second step is animated by the expectation for creating a culture and a learning environment where accommodations are no longer required such that the need to 'accommodate' is minimized by virtue of pervasive pre-existing accessibility.

2.1.2 SOCIAL VS MEDICAL MODEL DEFINITIONS OF DISABILITY

It is not the mandate of this review to resolve the continuing debate between supporters of a social model of disability and those placing greater weight on diagnostic, psychoeducational and neuropsychological assessments. However, it is part of this review to identify any differences in philosophical approaches to the benefit of students. The debate regarding what a disability is and how views differ is pertinent.

Within universities and society, there are philosophical and practical differences concerning disability. On the one hand, the medical model sees disability arising from physical, cognitive, or mental impairments. On the other hand, the social paradigm defines disability as a function of barriers, both physical and attitudinal, that are built into society. This social model of disability arose out of a strong desire amongst disabled people to take control of their destiny and to understand 'disability' as a function of the physical and attitudinal premises upon which we build

societies. Ableist attitudes and behaviours have resulted in a society navigable only by some and not others[1].

An institutional approach to accessibility must be based on the fundamental understanding that conscious and unconscious choices that disadvantage some members of society have been and continue to be made. At the same time, science has played a role in pathologizing disability and now has an important role to play in understanding and articulating the needs of disabled people who seek its support. Typically, it takes a consensus-based approach to arrive at how to address disability rights in order to accommodate disability fairly and adequately.

Between these two poles, there are versions of disability that reflect both medical and social perspectives.

2.1.3 EVOLUTION OF UNIVERSAL DESIGN FOR LEARNING (UDL)

As tracked by Jay Dolmage in *Academic Ableism*[2], universal design finds its roots in "useable" design standards emerging in and expanding after World War II.

---

[1] Consider: Oliver, Michael, and Colin Barnes. *The New Politics of Disablement*. Palgrave Macmillan, 2012.

[2] Dolmage, Jay T. *Academic Ableism: Disability and Higher Education*. University of Michigan Press, 2017.

Having arisen in the design field, universal design is a philosophy rooted in developing spaces and tools that are functional for the highest number of users, believing that the things we make should change to fit the user rather than the other way around. In the 1980s, the concept of universal design was transplanted into the field of education, dubbed Universal Design for Learning or UDL. In most configurations, UDL consists of a series of principles or guidelines that seek to create pedagogical spaces accessible to all students regardless of their learning styles or abilities. Since its origins in spaces like the Center for Applied Special Technology (CAST) or the Center for Universal Design at North Carolina State University, a variety of principles, guidelines, and techniques of UDL have proliferated along with a series of publications and training regimes that promise to create spaces accessible to all types of learners. UDL is often touted as the future of education and the only way out of costly and complex accommodation systems. With UDL, we are told that no student will require accommodations because our classrooms will be inherently accessible.

Despite the noble objectives and aspirations of UDL, a genuinely universally accessible classroom remains out of reach for a variety of reasons. Some modalities of UDL are too prescriptive, collapsing accommodation needs into

manageable clusters that miss the diversity of disability experiences. UDL can also become entangled in access paradoxes in which efforts to make a space accessible for some, creates barriers for others with no clear answer on how to resolve these contradictions. UDL modalities can sometimes be vague and aspirational, leaving educators unsure of how to implement them practically. There currently exists no consensus on **how** to execute UDL effectively, with unanswered questions on how to deploy UDL in a way that enables all students. This is not to say UDL is a failed or hopeless project, but rather to situate UDL not as the "silver bullet" to resolve all inaccessibility, but as one of several important tools in our accessible learning repertoire[3].

2.1.4   DISABILITY TRENDS AND STATISTICS (CANADA, ONTARIO, QUEEN'S)

In Canada, youth are experiencing the largest increases in disability of any age group, placing great pressure and responsibilities on universities. As of 2022, 20% of youth (aged 15 to 24 years) in Canada self-identified as having

---

[3] Consider: Currie, Sarah. *The Mad Manifesto*. 2023. UWSpace, http://hdl.handle.net/10012/19689.

a disability, an increase of seven percentage points over 2017. Mental health-related (68%), learning (46%) and pain-related (34%) disabilities were the most common types of youth disability in 2022. Mental health-related disabilities among youth and working-age adults each increased by 8 percentage points from 2017, representing the largest increase among all disability types and all age groups[4].

Ontario university statistics from 2019/20 to 2022/23 mirror these trends. Ontario Ministry for Colleges and Universities (MCU) statistics demonstrate that the number of students registered with Offices for Students with Disabilities (OSD) at all universities increased by 32% from 2019/20 to 2022/23. In 2022/2023 there were 66,939 disabled students registered at Ontario universities which demonstrates that approximately 13% of students enrolled in Ontario universities were registered with their respective centres for disabled students in 2022/2023. However, it must be acknowledged that many more disabled students are enrolled at Ontario universities than

---

[4] "The Daily — Canadian Survey on Disability, 2017 to 2022." *Statistics Canada*, 1 Dec. 2023, https://www150.statcan.gc.ca/n1/daily-quotidien/231201/dq231201b-eng.htm.

these numbers reflect. Access to and the cost to obtain the requisite medical documentation to qualify for academic accommodation pose barriers. In addition, it is well known that some students who are eligible for and deserving of academic accommodation do not register with the centre that is in place to assist them to do so, because of the stigma in some academic disciplines and cultures associated with being identified as disabled.

At Queen's, the number of students registered with Queen's Student Accommodation Services (QSAS) for the same four-year period plus 2023/2024 is presented in the table below.

School Year	2019/ 2020	2020/ 2021	2021/ 2022	2022/ 2023	2023/ 2024
# Student Registered with QSAS *	2256	2967	3370	6074	6165
Increase Year over Year	-5% (18/19; n=2376)	31%	14%	80%	1.5%
Total Queen's Student Population**	25,260	26,309	27,697	28142	28,333
% of Student Population Registered with QSAS	9%	11%	12%	21%	22%

*QSAS Year-End Reports submitted to Ontario Ministry of College & Universities for 2019/20 – 2023/24.

** Queen's Enrollment Reports, 2019/20 to 2023/24)
Source: Reports | Registrar & Financial Aid Services (queensu.ca)

While the overall number of students registered at Queen's University has gradually increased by approximately 12% over the last five-year period, the number of students registered with QSAS during the same period increased by 173% (from 2256 to 6165 students). Provincial statistics are available for a four-year period (2019 to 2023) rather than a five-year period, showing a 32% increase in students registered with relevant accommodation services across Ontario universities during that time. The increase at Queen's for the same four-year period was 169%.

Disability Category	Percentage of Students Registered for Accommodations									
	2019/ 2020		2020/ 2021		2021/ 2022		2022/ 2023		2023/ 2024	
	ON*	QU**	ON	QU	ON	QU	ON	QU	ON	QU
Mental Health	41%	34%	42%	36%	40%	38%	43%	37%	N/A[+]	33%
Learning Disabilities	17%	22%	16%	21%	18%	20%	14%	15%	N/A	14%
Attention Deficit/hyperactivity disorder (ADHD)	15%	17%	17%	17%	15%	21%	24%	25%	N/A	29%

* Province of Ontario

Source: Ministry of Colleges and Universities (Ontario), 'Aggregated SWD Data', January 2024.

** Queen's University

Source: QSAS Year-End Reports submitted to Ministry of Colleges and Universities (Ontario) for 2019/2020 – 2023/2024

[+] Not Available

Increases in raw numbers have resulted in corresponding changes in the proportion of the student body registered with QSAS. In 2022/23, 21% of Queen's students were registered with QSAS, up from 12% the previous year. This is similar to the known prevalence of youth with disabilities in Canada (~20%) but higher than 2022/23 provincial average which indicates only about 13% of university students are registered for accommodations.

A 31% increase in enrolled students in the 2020/21 academic year and an 80% increase in 2022/23 academic year are noteworthy. While reviewers were unable to discern the reason for these large increases, they do explain the often-heard perception of a tsunami of students with accommodation needs, and indeed, Queen's University's request for the review.

The percentage of students with invisible disabilities registered with Offices for Students with Disabilities at Ontario Universities and at Queen's University is provided in the following table. No substantive difference is seen between provincial and Queen's University percentages.

These trends have not gone unnoticed. In response, the Higher Education Quality Council of Ontario (HEQCO) has put forward the following findings as a result of their comprehensive historical review and contemporary

analysis of the number of students requiring academic accommodation, the types of conditions students are managing, the modes of academic accommodation being used, and the challenges faced by students, faculty and staff in organizing high-quality academic accommodation.

HEQCO's findings:

- the demand for accommodation and accessibility support in Ontario is growing and students' primary needs are changing,
- addressing student accommodation and accessibility needs is increasingly complex,
- the current service model for supporting students with disabilities is unsustainable,
- OSDs are adapting and expanding service delivery to meet demand, and
- MCU's funding model and institutional reporting requirements can be streamlined and enhanced[5].

---

[5] Lanthier, Sophie, et al. *Accessibility Services at Ontario Colleges and Universities: Trends, Challenges and Recommendations for Government Funding Strategies*. Higher Education Quality Council of Ontario, 22 Nov. 2023, p. 32, https://heqco.ca/pub/accessibility-services-at-ontario-colleges-and-universities-trends-challenges-and-recommendations-for-government-funding-strategies/.

2.1.5   QUEEN'S POINT OF VIEW

Like HEQCO, Queen's University is cognizant of the current and historical context and statistical trends.

Within its charge to the review committee, Queen's University noted "In the last academic year (2021-2022), the number of students with disabilities registered with Queen's Student Accommodation Services (QSAS) increased by 33%, and this upward trend is expected to continue."

Patrick Dean, Principal and Vice-Chancellor, said, "Our goal is to bring clarity and, where necessary, enhancements to our academic accommodations processes and to encourage effective and collegial working relationships among senior administrators, staff, and faculty responsible for supporting our students. We must all work collaboratively and honour our commitment to creating an inclusive space where everyone is welcome, and respected, and students are set up for success."

Stephanie Simpson, now Vice-Principal, Culture, Equity and Inclusion, said "It is critical for us to ensure that everyone involved in academic accommodations feels supported and empowered and that students are able to

fully participate in their academic pursuits without any barriers."[6]

2.1.6   REVIEWERS' MANDATE AND LIMITATIONS

As a result of the impact of the dramatic increases in the number of students seeking academic accommodation and the strain this growth places on students, staff and faculty, four independent reviewers representing a wide variety of backgrounds and expertise were recruited separately by the offices of the Queen's University Principal and Vice-Chancellor, and the Provost and Vice-Principal (Academic), assisted by the Office of the Vice-Principal Culture, Equity, and Inclusion. The mandate set out for, and accepted by the external reviewers was to consider and make recommendations concerning:

- the adequacy and fairness of policies, procedures and programs in relation to student academic accommodations and considerations,
- education of community members, including students, staff, faculty, and administrators, regarding student

---

[6] "Supporting Academic Success in an Inclusive and Accessible Environment." *Queen's Gazette*, 6 Apr. 2023, https://www.queensu.ca/gazette/stories/supporting-academic-success-inclusive-and-accessible-environment.

academic accommodations/considerations and accessibility,

- the resources dedicated to the effective and timely implementation of the policies, procedures and programs in relation to student academic accommodations and considerations, and

- any other matter that the reviewers consider relevant in assisting the university in meeting its obligations to students with disabilities.

The limitations to the reviewers' scope included:

- individual files related to clinical or administrative decisions made by healthcare providers or Queen's Student Accessibility Services, and

- individual files related to administrative or legal decisions in relation to the university's academic appeal processes or any matter before the courts or the Ontario Human Rights Tribunal.

3   METHODOLOGY

To obtain the greatest amount of feedback on community members' experiences and perceptions of the adequacy and fairness of the current academic accommodation and consideration of policies and procedures, the reviewers used the following methods to seek input from students and all members of the Queen's community and beyond.

3.1.1   ADVISORY COMMITTEE

On April 6, 2023, in *The Gazette,* the University publicized the upcoming academic accommodation review and invited interested community members who live with a disability to apply for membership on an Advisory Committee. Via a random selection process organized by the Principal's Office, five students, two faculty members and one staff member were invited to form the Advisory Committee to provide input directly to the external panel of reviewers. The individuals who have provided invaluable input, feedback and assistance to the reviewers are Thomas Abrams, Sarah Besseau, Kate Brothers, Margaret Cavanagh-Wall, Megan Ingram, Amelia Nicholas, and Jane Tolmie.

3.1.2   INTERVIEWS

The reviewers conducted seventy-seven (77) interviews with students, staff, and faculty over the six months from August 1, 2023, to January 5, 2024. This number included students, people in positions that typically provide support to students and instructors to implement academic accommodation policy, including faculty, and individuals who contacted the reviewers directly.

With input from the Advisory Committee, the reviewers also identified fifteen different groups and associations connected with Queen's that provide support and service to a wide variety of students with specific disabilities. Representatives of these groups were contacted by email and through their social media accounts, with an invitation to organize a group consultation or individual interviews with the reviewers.

Each interview was conducted using the same protocol. The reviewers introduced themselves. The interviewee(s) introduced themselves and explained the nature of their role or area of study. Each interviewee was assured of the confidentiality of the conversation and was encouraged to speak as candidly and openly as possible. Each individual interview and group consultation was framed by three queries.

- What is working now?
- What is not working?
- What improvements are needed?

Each interviewee was encouraged to provide whatever additional information they considered important to ensure academic accommodations at Queen's are provided in the most fair and effective manner.

3.1.3   IN-PERSON CONSULTATIONS

Four thousand seven hundred (4700) students registered with Queen's Student Accessibility Service (QSAS) were sent a personal email explaining that a review was being conducted by an external panel of reviewers and an invitation to provide feedback at in-person meetings on the Queen's campus. Meetings were held specifically for students registered with QSAS. Students could also attend Faculty-based student meetings scheduled between October 17 and 19, 2023. Students unable to attend an in-person consultation were encouraged to contact the reviewers directly to arrange an individual 'Zoom' meeting.

An announcement in the University Gazette, two subsequent emails to all faculty and staff, and social media outreach organized by the Office of the Vice-

Principal, Culture, Equity and Inclusion publicized the opportunity for students, staff and faculty to meet with the reviewers during the three-day on-campus visit. The reviewers independently contacted *The Journal* directly and an article[7] describing the external review along with a detailed schedule of morning, afternoon and evening on-campus meetings.

3.1.4   ON-CAMPUS FACULTY-BASED CONSULTATIONS

To make it as easy as possible for students, staff, and faculty to provide in-person feedback to the reviewers while on campus, three meetings in accessible venues were scheduled for each of the Faculties of Education, Engineering, Health Sciences and Law. Given that the Faculty of Arts and Sciences (FAS) encompasses approximately 70% of the student population and has the largest number of faculty and staff, six meetings were scheduled for FAS to recognize the higher volume of potential participants. Reviewers were also available each evening, on a drop-in basis in a central campus location,

---

[7] Coppolino, Sophia. "Student Input Wanted on Student Accommodations." *The Queen's Journal*, 17 Oct. 2023, https://www.queensjournal.ca/student-input-wanted-on-student-accommodations/.

in order to be accessible to those who could not meet during the daytime hours at a Faculty-based location or to attend the meeting set up for QSAS registered students. Finally, the reviewers undertook an extensive tour of the campus with the assistance of personnel from Queen's Facilities.

3.1.5   ONLINE QUESTIONNAIRE

To ensure that all those who wanted to provide feedback had an accessible opportunity to do so, an online questionnaire was made available for input from mid-October 2023 to December 1, 2023. The questionnaire was publicized through a variety of channels, including:

- the online platform, onQ, that provides information to all students and faculty of the University.
- the Office of the Vice-Principal, ECI, also organized the dissemination of information about the confidential online questionnaire via
  - social media accounts
  - electronic signage in high-traffic areas
  - the Gazette
- the list serves managed by the Society of Graduate and Professional Students Association (SGPS) and AMS, the undergraduate student association.

Ultimately, 814 people opened the survey. Of those, 755 people responded to quantitative questions, added text

answers to three open-ended questions or both. Aggregated findings can be found in Appendix B.

3.1.6   WRITTEN SUBMISSIONS

Written submissions were received from five Queen's community member groups. Four individuals also provided in-depth written submissions.

3.1.7   DOCUMENT REVIEW

The reviewers studied all Queen's Senate-approved policies related to academic accommodation, academic consideration, academic appeals, equity and inclusion. In addition, the reviewers read all Faculty-generated procedural information posted on their websites that related to academic accommodation, academic consideration, and academic appeals. Finally, all the student wellness, equity and inclusion and disability-related reports that have been generated by the University in the past 3 years were reviewed.

The statistics submitted to the Ministry of Colleges and Universities for the Province of Ontario in the annual report prepared by QSAS (previously named Office for Students with Disabilities), which included the number of students registered with the office and the percentage for each category of disability, were accessed by the reviewers. All feedback gathered from recent satisfaction

surveys completed by students who receive services from QSAS was also reviewed.

3.1.8   ENVIRONMENTAL SCAN

A number of community members recommended a wide variety of wellness and disability-related publications and reports that they found instructive; the reviewers studied each recommended report.

All the academic accommodation policies associated with the U-15 Universities were reviewed, along with those from other universities that were either recommended or considered innovative.

All the reviewers have extensive experience in the post-secondary education environment, in a wide variety of disciplines, in conducting research, in teaching and learning, and in administrative roles. The reviewers used their in-depth knowledge of relevant literature to inform their understanding of the institutional and attitudinal barriers that inhibit and contribute to fair and accessible post-secondary education.

3.1.9   FRAMEWORK FOR ANALYSIS OF DATA COLLECTED

A great degree of research and consultation has been done by the Ontario Postsecondary Education Standards

Development Committee to identify the barriers to making post-secondary education more accessible to disabled.[8] As the barriers identified are comparable to the barriers we identified, we used the following six subject matter categories as the framework for analyzing the data collected:

- Attitudes, behaviors, and perceptions
- Awareness and training
- Assessment, curriculum, and instruction
- Digital learning and technology
- Organizational barriers
- Physical and architectural barriers[9]

---

[8] Doyle, Tina. "Development of Proposed Postsecondary Education Standards — Final Recommendations Report 2022." *Government of Ontario*, 2022, http://www.ontario.ca/page/development-proposed-postsecondary-education-standards-final-recommendations-report-2022.

[9] This barrier is included even though it was not part of the mandate of the external review as we received both written and oral input on this subject.

4 WHAT WE HEARD

4.1 OVERARCHING OBSERVATIONS

4.1.1   STUDENT, STAFF AND FACULTY COMMITMENT

Across Canada, many post-secondary institutions have struggled to accommodate a dramatic increase in students identifying as disabled. What was evident in many of the oral and written submissions received was the dedication of students, faculty, and staff to the broad principles of leveling the playing field and moving toward full accessibility for Queen's University disabled students. During the review, it was clear that the Queen's community is committed to traversing a path that will substantively improve outcomes for disabled students.

In many instances, when asked what was working in disability accommodation at Queen's, actions by students, faculty, and staff colleagues were cited as evidence of a growing collective commitment to upholding and extending the rights of a growing community of disabled students. Putting students at the centre of processes was highlighted. Whether speaking with faculty and staff, Queen's Student Accessibility Services (QSAS), the Adaptive Technology Centre (ATC), the Accessibility Hub, the Human Rights and Equity Services and other services

dedicated to bringing about accommodation and accessibility for disabled students, the reviewers often heard a strong commitment to bringing about equal treatment for disabled students. Reviewers also heard that, to meet the challenge of the increased number of students registered with QSAS and address erroneous myths and misinformation, the University must significantly change its approaches to disability accommodation and accessibility.

However, while many members of the Queen's community are attempting to provide a high level of accessibility, it must be acknowledged that within any institution, there are both systemic and system-wide barriers to achieving the requisite high level of accessibility for all students to be able to succeed in a manner that is commensurate with their capacity and effort. As the great majority of students, faculty, and staff are **not** working or learning while managing conditions that require accommodation, it is not unexpected that continually assessing policies, procedures, initiatives, infrastructure, etc., through the lens of increasing accessibility would not necessarily be at the forefront of their thinking. As a result, it was apparent that some faculty only saw academic accommodation as, at best, an obstacle that had to be managed or, at worst, a burden. Sadly, some nondisabled students also

questioned the validity of required accommodations. In contrast, one of our interviewees indicated, "Every able-bodied person is only one accident away from being disabled". This view exemplifies the importance of designing for accessibility and the need to educate those with no personal experience of disability to appreciate the reality that their perspective on the world is skewed. The reality is that it is not, in fact, possible for everybody if they simply 'do the work' to excel within our existing inaccessible systems.

4.1.2   LACK OF LEADERSHIP

In the context of disability accommodation, human rights leadership is based on two pillars. First is building and sustaining the capacity to address individual concerns or claims to accommodation. There can be no 'go-it-alone.' The capacity to address individual accommodation needs must be constructed through meaningful collaboration with all partners, especially disabled students themselves, in the entire process, from policy and procedure development to daily practice. A consensus approach to accommodation is the path to eventual success.

Second, human rights leadership is also focused on the transformative - measures that move the needle and qualitatively change the experience of everybody,

particularly students who are engaged in the path toward full accessibility. Transformation cannot take place without converting ideas into reality and without, again, building a consensus based on principle, but flexible in strategy and tactics.

Unfortunately, the reviewers found that the leadership and flexibility necessary for transformative change at Queen's is not optimal in its attitude and behaviours. Specifically, we found a virtual standoff between leaders responsible for accommodation processes and some faculty, with no means for reconciliation being contemplated by senior leaders. In other instances, we heard that decisions have been made unilaterally by siloed units, without adequate input or oversight, as there is no apparent decision-maker currently responsible for strategic implementation of accommodations and/or accessibility. Sadly, students are the most negatively affected by this leadership gap.

4.1.3   DE-CENTRALIZED NATURE OF QUEEN'S

An obvious organizational and system-wide barrier to accessibility is the decentralized nature of Queen's University. While decentralization can offer important flexibility for diverse Faculties' functions and formats, the disconnected nature of the university has resulted in

radically different student experiences of accommodation at Queen's. Specifically, the experience of applying for accommodations can vary dramatically from student to student and Faculty to Faculty. Students report distinct cultures of accommodation within different Faculties and, at times, even from department to department. The result is that students receiving accommodations in one class offered by one Faculty are succeeding while simultaneously being denied their accommodation needs in another class offered by a different Faculty. The differing application of accommodations can leave students confused and frustrated, on top of limiting their access to education.

The decentralized nature of Queen's has also contributed to a notable lack of coordination, both within and outside the university. Multiple respondents expressed the need to speak with multiple people before finding the "right" person who was able to help, with one student stating, "Every time I need to contact someone about something, my email is always forwarded to like 5 different people before I can begin to get an answer". The demand on students to find and then verify information results in lost time and a high demand for self-advocacy. Faculty were similarly flummoxed, reporting that QSAS was very difficult to contact. At times, faculty receive no response,

and when they do, they feel that their input is disregarded. It is important to note that quite a few students and faculty members directly acknowledged that QSAS staff may be overworked and under-resourced, but both are left without adequate support when trying to understand or learn how to obtain or implement approved accommodations.

Perhaps most importantly, though, the decentralized nature of Queen's has resulted in a communication vacuum in which information is routinely being lost in transmission and/or translation. Throughout our review, we received different interpretations of how the accommodation process functions and differing accounts of how changes were brought into effect. While communication barriers are common within organizations of Queen's size, the lack of clear and comprehensive information on how the accommodation system functions and what roles/responsibilities each member of the organization plays in this process is a significant organizational challenge. For example, while the Advisory Committee on Academic Accommodations (ACAA) appears to be a centrally organized means for disseminating information, there was no faculty representation on this committee until recently. Myths and speculation have filled these gaps, such as the unverified speculation that accommodations are routinely granted

without documentation, which further delegitimizes the authenticity of accommodation requests and the expertise of QSAS staff and leaves some faculty to ponder who on campus is truly concerned about academic standards.

Finally, and surprisingly, we observed some significant organizational gaps or silos between the existing services for disabled students at Queen's. There are many helpful and student-focused services and resources at Student Wellness (Medical and Mental Health), Student Academic Success, Library-based services (Library Accessibility Services; Adaptive Technology Lab; Office of the Adaptive Technologist; Office of the Accessibility Coordinator) and QSAS. However, there is no clear or formal pathway for students to be smoothly (re)directed into needed services on campus. For example, there is no mandate or pathway for a QSAS Advisor to provide anything other than a Letter of Accommodation. Providing advice and referrals for skill development through Student Academic Success Services or other University resources can and does occur based on individual initiative, but it does not appear to be a standardized practice. The result is that students report finding resources by accident, via circuitous routes, not at all, or too late in their academic careers.

4.1.4   INADEQUATE CONSULTATION

Stemming from the lack of leadership and the decentralized nature of Queen's, the reviewers heard that it had become common to introduce signature initiatives with little to no consultation and collaboration. Faculty and staff clearly expressed concern about the lack of collaboration between QSAS, Information Technology Services, faculty, and others who have fundamental interests in the delivery of services to disabled students. That perceived gap in consultation has led to confusion, despair and an unwillingness to engage in accommodation processes on the part of critical partners. The lack of consultation has led to platforms being purchased, such as GLEAN or NoteQ, without consideration for how they may (or may not) adequately interact with existing infrastructure or processes. As opposed to being active co-creators in accessibility at Queen's, some reported feeling as though decisions had been made without considering important contexts or limitations that could prevent successful implementation. The reviewers heard a clearly expressed desire for change, with those affected given a fair opportunity to identify and voice concerns before decisions are made.

4.2 IDENTIFIED BARRIERS AND CHALLENGES – ORGANIZATIONAL

4.2.1 POLICY AND PROCEDURAL BARRIERS

The Academic Accommodations for Students with Disabilities Policy (the Accommodations Policy) and the Academic Considerations for Students in Extenuating Circumstances Policy (the Academic Considerations policy) and procedures currently deployed at Queen's University do not differ significantly from other Ontario universities. The problem is how these policies are, or more often are not, enacted across campus. The issue with implementation appears to be caused by two primary challenges: one, a lack of specificity within the policies themselves, and two, the arbitrary application of the existing policies from Faculty to Faculty.

One significant point of confusion is the circumstances in which the Accommodations policy is appropriate versus when the Academic Considerations policy is applicable. Whatever the aims of the Accommodations policy and the Academic Considerations policy and procedure, the result is a lack of clarity on the part of students, staff and faculty about when one or the other might apply. This confusion is further compounded by the Academic Considerations

policy allowing for differential implementation from Faculty to Faculty. University personnel have little option but to follow policies and procedures that have received Senate approval; however, given the difficulties encountered in the implementation of these policies and procedures and given the resultant confusion and negative impact on students' experience with the application of policies and procedures, there is an urgent need for a thorough 'systems review' that includes both policies to clarify and universalize their fair implementation.

Throughout the review process it also became clear that there was not just a lack of clarity about which policy was to be followed, but also a direct conflict of policy/procedural application in several instances. For example, students and faculty alike expressed frustration with the current assignment extension practices, be it the 3-day grace period without documentation provided by the 'Self-Declaration of a Brief Absence' policy or the 7-day extension granted as an academic accommodation. How and under what circumstances they worked together and how these align with interpretations of UDL principles have not been defined or agreed. For faculty, it can be a complex undertaking to design assignments that provide for flexible deadlines or extended test time for all students as part of UDL, and to fulfill a student's approved

academic accommodation for additional time on top of the extensions provided to all students. For disabled students, there is a legitimate concern that universal extra time places them at a distinct disadvantage; if everyone receives additional time, has the field of play really been levelled? Don't all students use all the time available to them? Further, faculty and students remain confused about implementing the 7-day extension accommodation. Confusion reigns despite a clear description of the use and parameters of the 7-day extension accommodation on the QSAS website. Opinions and practices vary on whether students must request the extension before the deadline, whether the extension is automatically 7-days or dependent on negotiation between the faculty and student, and what happens when a student requires additional time after the original extension due to the complexity and/or unpredictability of the impact of a particular condition and if it can be used in combination with the Self-declaration of Brief Absence? This confusion has resulted in uneven experiences that often rely on a student's ability to advocate or negotiate for their access needs. This is contrary to the spirit of the Accommodations policy and further reduces students' likelihood of academic success.

Another policy conflict identified is that for some students, the ability to attend class virtually is a vital accessibility feature when attending in person is simply not possible. While this accommodation is approved by QSAS, the reviewers heard repeatedly that this form of labour was outside the faculty employment agreement and, in some cases, outside the scope of what an individual faculty member can technically achieve. For example, when a classroom, laboratory or teaching environment is not equipped with computer, Internet or a set-up that allows virtual attendance, placing responsibility on individual instructors to find solutions is unreasonable. Without clear compensation for the additional labour, some faculty have refused this accommodation request, leaving students frustrated to lose an accommodation offered without question at the height of the COVID-19 pandemic. Resolving this conflict is a necessary and important step forward on this issue.

The murky boundaries between the constellation of accommodation and academic considerations policies, the inconsistent application of these policies and a significant lack of clear communication have left many feeling that the current accommodation system is rife with abuse. Many faculty members and some students reported serious doubt that all students currently being granted

accommodations are legitimate and, instead, the system is being exploited to make university "easier" for those able to secure documentation by illegitimately reporting the correct cluster of symptoms. These suspicions were largely anecdotal and unproven. Several respondents stated outright their belief that fraudulent accommodation requests were making life harder for students who are actually disabled. We must stress, again, we have no data to prove or disprove this belief.

4.2.2   QSAS INTAKE PROCESS

In our review, we observed that Queen's University currently deploys an in-take process not dissimilar from other universities in the province in which disabled students are asked to self-identify with QSAS as being a student with an accommodation need, followed by an in-take process that relies on medical documentation to validate the accommodation request. A key organizational barrier, expressed by students, is the lack of awareness of the services provided by QSAS or where one would register as a student with a disability. For some, this was driven by a lack of awareness or education on how accommodation systems function at the post-secondary level, where others identified a lack of information being readily available when first starting at Queen's. Also, some students become disabled after being admitted so

have no experience to rely on and may have no one to guide them to QSAS. Hence, they struggle unnecessarily until a faculty or staff member notices and refers them to the appropriate resource.

Once aware of the service, some students described the registration process as relatively straightforward. At the same time, other students described the process as labyrinthine, plagued by a lack of access to QSAS Advisors and confusing explanations of what does and does not constitute valid medical documentation. These students described how it can feel like navigational and advocacy labour is placed on their shoulders on top of an already heavy workload associated with being a full-time student. This can be exacerbated for first-year students who are trying to navigate this system while also managing the transition to a new school/city and staying caught up with their coursework. As one respondent described it: "The current system places too high of an advocacy load on students, without a system to support them, and does not work to educate professors so as to actually work to improve the inclusivity of learning spaces". One strategy to mitigate this workload placed on students, is different requirements for the provision of short and long-term accommodations. For example, students appreciated not having to produce new

documentation repeatedly for the same existing condition once the proper documentation had been produced.

The issue of timely access is recognized as a central barrier during the intake process. The disconnect between the "urgency" of receiving an accommodation and the time it takes for students to be seen at QSAS (sometimes weeks) and/or securing documentation (months, sometimes years) is understood. To resolve this gap, QSAS has recently instituted the opportunity for students to receive "short-term accommodations," providing relief for two consecutive terms while attempting to secure the documentation necessary to qualify for permanent accommodations. While this solution resolves the problem in the short term, some students describe feeling trapped in an endless loop of "short-term accommodations", which adds both additional repetitive workload and stress. When students have disclosed feeling overwhelmed by the process or unable to manage the work, a common suggestion is for the student to take time off until documentation can be secured, a solution contrary to most students' expectations.

Once inside the intake process, some students described it as being inaccessible. Of note, respondents identified feeling the process does not take a trauma-informed approach, which can make it difficult for some students to

make it through the process safely. Other respondents noted that they were not provided accommodation for their disability within the process itself. For example, several respondents note the difficulty of going through a disclosure-based system when their diagnosis (such as anxiety) can make it difficult to make these types of disclosures. Other respondents noted the paradox of being asked to navigate a complex, multi-step, and exhausting process to receive accommodation for a disability, such as ADHD, that requires accommodations for this type of undertaking. This can leave some feeling like they need an accommodation just to get through the intake process.

While some QSAS personnel identified an over-reliance on the medical model of disability as being a philosophy they are attempting to challenge in their work, accommodations are still largely tied to medical diagnoses that outline functional limitations from approved professionals. Student respondents identify not just the cost of obtaining these assessments and documentation as a barrier but also the time it can take to access these documents, whether it be the need to travel back home to see a family doctor or waiting months, or at times years, to see a specialist. The costs associated with medical documentation were also identified as an important class

issue, as it privileges those with the resources and networks to acquire documentation over those who cannot access multiple physicians or afford to see private practitioners, e.g. psychologists. Some were concerned this meant that students with greater means at their disposal were simply able to see doctors until they received the diagnosis needed to access the desired accommodation.

Medical notes also posed a problem for some international students because their documents were not in English or because the professional from their home country was not deemed legitimate. Concerns were also raised about the lack of demographic diversity in Student Wellness and QSAS, with some respondents worried about the continuing impacts of systemic racism on their ability to safely and successfully navigate health systems that are not reflective of their lived experiences.

4.2.3   DIFFERING PERSPECTIVES ON COMMUNICATION WITH QSAS

In both the survey and interviews, student respondents shared predominantly positive experiences with their QSAS Advisors, feeling that they were receiving appropriate compassion and support from the office. Most of these comments focused on the ease of access to their

Advisor once they had cleared the hurdles of the intake process, whether it was communicating via email or meeting (in-person or virtual), while others noted how important their Advisor was when advocating for their accommodation needs with faculty members. It was also noted by several students that professors will often grant accommodation without prying for diagnostic details, which both honours the legitimacy of the request and complies with Ontario Human Rights Commission (OHRC) policy on preserving the dignity of disabled persons.

On the other hand, faculty and staff responses were not as positive when discussing the relationship between QSAS and faculty. Throughout the review, we heard reports of both QSAS staff and faculty feeling unheard, distrusted or disrespected. Rather than a collaborative experience, there is a sense that interactions between QSAS and faculty can be perceived as top-down and/or oppositional in nature, with neither side respecting the expertise and experience of the other. Both groups believe the other holds the power balance in these situations. For example, QSAS advisors feel that some faculty members use their status to negate their responsibility to implement approved accommodations, while faculty members feel they may be vulnerable to accusations of human rights violations when it is not

possible to implement the accommodations as written. While there were positive reports of QSAS and faculty synergies and collaboration, the relationship between QSAS and faculty was largely described as fractured and hostile. We identify this strained relationship as a key contributor to the difficulties currently experienced by disabled students at Queen's.

4.2.4   DECISION-MAKING AND APPEAL BARRIERS

A key question in the minds of most respondents is one of authority: who has the final say when there is a dispute between the student's understanding of the letter of accommodation and the faculty member's understanding of the requisite accommodation? Within the current accommodation system, there are difficult questions, often with conflicting perspectives, and it is often unclear who is responsible for making and implementing a final decision. For example, situations were identified in which students produced conflicting and contradictory documentation from external providers, validating the need for accommodation. Who has the expertise and the responsibility for deciding which expert opinion is correct? Similarly, students report a desire to bring forward Individual Education Plans (IEPs) from the secondary system, while staff report that these plans often do not

comply with the medical documentation standard currently being used by Queen's. Who determines what is and is not valid documentation? Now, these decisions are largely made within QSAS, either by In-take Coordinators or sometimes the Manager; however, there is a noted lack of synchronicity in how these types of questions are decided, with a perception existing that documentation may or may not be supported, based on who is being asked. Who is ultimately responsible, financially and otherwise, for ensuring the accommodations policy is enacted properly? While there may exist written answers to these questions, the lived experience described by respondents is that these and other questions remain unanswered.

Beyond decision-making, there is also a clear lack of a systemized, arms-length appeal process to ensure fairness and timeliness. There is no clear means for students to appeal rejections made by QSAS beyond requesting to speak to another Advisor or accommodations denied by faculty members. Also, students are routinely informed that the only valid appeals are on the grounds of "health/medical" or "extenuating circumstances" and that they can only be initiated at the end of the term. This often results in students being forced to make appeals directly to Department or Faculty leadership and, as one student notes, there is reason to

47

worry "…about the power imbalance of working with a professor in class who is also in charge of appeals. How can this not result in bias?". Similarly, there is no clear means for a student to appeal an instructor's determination that an accommodation request cannot be effectively honoured beyond relying on the advocacy of QSAS or an Associate Dean. At the same time, there is no appeal framework for instructors to negotiate or appeal an accommodation that is seen to negate learning outcomes, nor do QSAS Advisors have a clear process to escalate a student or faculty concern. This also contributes to an adversarial dynamic between QSAS and faculty as they can be, at times, pitted against each other.

Developing a centrally administered, arms-length body that can fairly and objectively investigate and make enforceable decisions will be an important step toward ensuring fairness within the system.

4.3 IDENTIFIED BARRIERS AND CHALLENGES – LACK OF AWARENESS AND EDUCATION

4.3.1 AWARENESS BARRIERS

The acknowledged increase in the number of disabled students registering with QSAS has led to speculation

about the legitimacy of approved accommodation. Some responses indicate an overall naivety regarding the actual percentage of disabled students provincially, nationally and at university, with speculation that "there just are not that many disabled students, so this increase must be wrong" or that it is "just too easy for students to obtain accommodations". In fact, the Ministry of Colleges and Universities statistics indicate a 32% increase in disabled students Ontario-wide over the past four-year period, which is a noteworthy surge. Statistics from Queen's, submitted to MCU by QSAS for the same time period, indicate a much higher increase of 173%. For some, these large increases are welcomed as they are indicative of more disabled students, finally, being able access to university education. Others are cynical and question the rigour and accuracy of the approval process. While this dichotomy of perception is not easily resolved, it does not seem fair that the disabled student should bear the brunt of disbelief. While such increases can cause concern from a systemic or resource perspective, growing numbers of disabled students is also of benefit to the campus community, bringing voices and experiences that have long been missing from the 'Ivory Tower'. It should also be noted that the reviewers were unable to uncover a clear or validated explanation as to why Queen's has experienced

this increase and so chose not to opine or substantiate conjecture on what may be driving this increase.

Unfortunately, the sudden increase in demand gives rise to misconceptions and potentially incorrect conclusions with the following profound impacts: students encountering staff and faculty who were quick to assume that the student's needs for accommodation were invalid or exaggerated; and, students describing the debilitating effect of having to advocate for standard and easy to implement accommodations that could not, in any way, be conceived as undue hardships for instructors or for the institution. To be repeatedly put in this position has sometimes resulted in students concluding that the effort involved in implementing their letters of accommodation is not worth the energy and time required. As a result, some students reported deliberately foregoing accommodations to the detriment of their grades. In some instances, students elected to transfer to a program in a different Faculty where accommodations are implemented as approved. In dire circumstances, students reported abandoning their studies completely. Responses to the expectation that students self-advocate for approved accommodations were mixed. Some students felt comfortable or sufficiently experienced to self-advocate, while others described the repeated need to self-advocate

as time-consuming, exhausting and anxiety-provoking. Also, some students' experience was that there was very little support or mentorship provided to navigate particularly complex and adversarial situations, and they were ill-prepared to make any progress on their own.

4.3.2   EDUCATION BARRIERS

It has been the experience of many faculty members that the training offered on the topic of academic accommodation for disabled students has been primarily focused on the legal requirement to accommodate to the point of undue hardship. Many said this was not new information, and they did not appreciate the focus of the training being premised on the belief that faculty would only provide academic accommodation if they understood that they were legally required to do so. Based on interview data, reviewers believe training would be much more valuable and more palatable to educators in the form of professional development that assists educators in understanding how to effectively accommodate a high volume of a wide range of disabled students with diverse learning needs in a time efficient and pedagogically appropriate and compassionate manner. Unfortunately, some faculty members describe attempts to discuss current evidence and best practices derived from the literature, especially related to anxiety disorders, which

would change how some accommodations are organized, but these efforts were unproductive and contributed to feelings of disrespect.

Another important training and education barrier, identified at Queen's University, is the lack of systematized training for faculty and staff to learn cutting-edge accessible pedagogy. While it was acknowledged that the Centre for Teaching and Learning have held occasional sessions and made modules on UDL available, they are not well attended. Without making time and space for faculty and staff to develop their skills, accommodation requests can feel a bit like being told *what* to do but rarely *how* to do it.

Education for teaching assistants (TAs) was also raised during our review. Most have no training on the principles of UDL or academic accommodation generally. However, some TAs told us that disabled students ask them for assistance, and they were not well prepared to respond to these requests. Our understanding is that the responsibility for implementing Letters of Accommodation is solely held by the instructor, and while that distinction might be upheld most of the time, it is important to recognize that, especially in large classes, there will be scenarios where students will approach their TAs instead of the instructor for assistance.

Another example of dramatically different perceptions and beliefs is that some educators state that providing students with the accommodation of 'extra time', which is very frequently approved, is counter-productive and does not benefit or, in fact, may harm students. They reference research that supports their views. Other faculty and staff cite contrary opinions and provide research results that demonstrate that extra time is beneficial for students receiving accommodation, as well as those who do not have a Letter of Accommodation, allowing them to demonstrate their knowledge and understanding truly.

Similarly, some students questioned the validity of the disability of some fellow students. This conclusion was based on the observation that for final exams, some students would write their exams in the Exam Centre, whereas throughout the term, the same students had written their exams in their classrooms. Skeptical students, and indeed faculty, might not take into consideration a variety of factors that can impact a disabled student's ability or need for accommodation at any given moment. For those with episodic disabilities, whose symptoms may build up and abate periodically, they may be "well enough" to write an exam in class one week, with symptoms becoming so debilitating the next that they require a different environment to perform in

their typical capacity. It is dangerous to accept their observation that many students receiving accommodation really did not need it is accurate, as the observers would have no means of knowing the nature of other students' conditions and the varying impacts of the disability depending upon the circumstances. The fact that the impact of disabling conditions can be dynamic depends upon the circumstances, while some conditions require the same permanent accommodation, e.g., blindness and visual impairment and some physical disabilities, must always be taken into account. The lack of awareness of the varying nature of how an invisible disability, and in some instances a visible disability, can differ depending on changes in medication, temperature, environmental conditions, and new or changed diagnoses is worrisome. This cynicism is not unique to an academic environment as it is well known that the same lack of awareness of the differing impact of some disabilities, depending on current circumstances, exists across all sectors of society. We share this reality not as justification for restricting access on campus or to encourage the belief that accommodations should not be offered on campus that are inaccessible in the "real world" of post-graduation. Rather, we want to state emphatically that universities have an obligation not to replicate these societal biases

and, instead, aspire to be leaders in accessible design and philosophy that can inspire and educate those beyond campus on how to do better.

It must also be acknowledged that it has been the experience of many high-performing students that, based on their academic achievements, staff, faculty members and fellow students, will incorrectly conclude that they do not need accommodation. However, the inverse is true in that it is only because these high-performing students have received adequate and appropriate academic accommodation that they have been able to demonstrate their considerable capacity. The toll on students to constantly defend their need for academic accommodation is considerable as it detracts dramatically from their academic experience and takes up valuable time that could be spent much more productively.

4.3.3 ATTITUDES, BEHAVIOURS AND PERCEPTION

Historically, universities have not been particularly friendly toward, or accepting of disabled students, as scholars like

Jay Dolmage[10], Ann Gagné[11], Simi Linton[12], Margaret Price[13], and Tanya Titchkosky[14] have explored in detail. Despite these histories, in both interview and survey responses, the Queen's community offered overt agreement that disabled students were a welcome and important part of the institution. Contrary to historic ableist beliefs that it was natural or inherent for "higher" education to remain beyond the grasp of students unable to survive in the existing university structure, the respondents at all levels routinely expressed a desire to support disabled students to succeed on campus and

---

[10] Dolmage, Jay T. *Academic Ableism: Disability and Higher Education*. University of Michigan Press, 2017.

[11] Gagné, Ann. "Academic Integrity, Ableist Assessment Design, and Pedagogies of Disclosure." *Second Handbook of Academic Integrity*, edited by Sarah Elaine Eaton, Springer Nature Switzerland, 2024, pp. 1245–60. *Springer*, https://doi.org/10.1007/978-3-031-54144-5_134.

[12] Linton, Simi. *Claiming Disability: Knowledge and Identity*. New York University Press, 1998.

[13] Price, Margaret. *Crip Spacetime: Access, Failure, and Accountability in Academic Life*. Duke University Press Books, 2024.

[14] Titchkosky, Tanya. *The Question of Access: Disability, Space, Meaning*. University of Toronto Press, 2011.

hoped that this very review would enable that work. It is important to honour this spoken desire as it is a requisite foundation upon which to build an accessible Queen's.

While there were overt and intentional declarations on the importance of inclusion, some subtle attitudes and perceptions circulating on campus emerged that we feel are important to note. One common perception expressed by faculty and students is the belief that the current accommodation system is rife with abuse, composed of students who have tricked or manipulated their way into ill-gotten advantage at the expense of "legitimately" disabled students. While this belief could be rooted in legitimate experiences of malfeasance, it may also be connected to deeper cultural imaginations of disability. For instance, running beneath this perception is a belief that disability is performative and therefore easily identifiable, either by appearance or behaviour, which ignores the plethora of impacts and experiences, which at times are not apparent/invisible, that make up disabled life[15]. These perceptions can also perpetuate the

---

[15] Consider:
Kattari, Shanna K., et al. "'You Look Fine!': Ableist Experiences by People With Invisible Disabilities." *Affilia*,

erroneous stereotype that aid programs are awash with "disability cheats"[16], putting enormous and unfair pressure on disabled students to continually prove the legitimacy of their accommodation requests, to appear "properly" disabled, or risk ostracization as a "fraud".

There is also a present perception on campus that accommodations are akin to coddling students, preventing them from developing the skills necessary to survive the "real world" of the "neoliberal late-stage capitalism" that awaits graduates. While it is fair to say that the bedrock objective of education is the growth of individual skills and

vol. 33, no. 4, Nov. 2018, pp. 477–92. *SAGE Journals*, https://doi.org/10.1177/0886109918778073.

Griffiths, Elisabeth. *"But You Don't Look Disabled" - Invisible Disabilities, Disclosure and Being an 'Insider' in Disability Research and 'Other' in the Disability Movement and Academia*. Edited by Jennifer Leigh and Nicole Brown, University College London, 2020, pp. 124–42. *nrl.northumbria.ac.uk*, https://doi.org/10.14324/111.9781787354975.

[16] Dorfman, Doron. "Fear of the Disability Con: Perceptions of Fraud and Special Rights Discourse." *Law & Society Review*, vol. 53, no. 4, Dec. 2019, pp. 1051–91. *Cambridge University Press*, https://doi.org/10.1111/lasr.12437.

knowledge, these perceptions also can hinge on the erroneous belief that accommodations are simply "get out of jail free" cards, a privilege or exclusionary benefit, as opposed to an adaptation to resolve an inherent inability or disabling environment. The instinct to fix or resolve a limitation is situated within the medical model belief that individuals are only worthy of support if they are actively working to "fix" their impairment condition. While some disabilities are episodic or can change over time, we must acknowledge the reality that other disabilities are chronic with no ability to change, regardless of dramatic medical or therapeutic intervention.

Finally, although relatively rare, there were several expressed desires to isolate or segregate disabled students from the mainstream population with the notion that it was not "fair" to integrate these two student populations. These comments ranged from a desire to require disabled students to be graded on a separate bell curve to not requiring non-disabled students to work in groups with accommodated students. Others felt disabled students should be "outed" as having used accommodations on their transcripts or that harsh consequences for those who do not use their accommodations "correctly" should be enacted. All these comments would indicate that there does exist an "us"

and "them" ableist mentality on campus, even if it is rarely spoken, and something that would benefit from further education.

The duty to accommodate disabled students in the provision of educational services is a legal obligation arising from the *Ontario Human Rights Code*. Appreciation for and institutional acknowledgement of the legal foundation to accommodate is the essential first step in what can only be described as a long journey toward ensuring substantive equality. Human rights law is unlike many other obligations arising under law. Making the idea of substantive equality real and turning that idea into action – both day-to-day and transformative – requires a protracted collaborative practice that engages community members in conversation about the values underlying the need for change. This conversation does not relinquish principles; instead, it amounts to a willingness to employ the utmost flexibility in strategy and tactics and to draw on the institution's moral and ethical resources to bring about necessary change. Behaviours running against such an approach often arise from attitudes of moral superiority – a sense that those unfamiliar with the legal obligations will attempt to water them down or evade them. At Queen's, that attitude has resulted in unproductive arguments, rather than constructive discussion, between primary

services for disabled students and faculty, and it has resulted in frustration for students, faculty, and staff.

4.3.4   ASSESSMENT, CURRICULUM AND INSTRUCTION BARRIERS

As previously stated, shared across the Queen's community is a genuine desire for students to succeed academically. Educators, staff, and senior leaders take their responsibilities seriously, and many endorse the belief that accommodations are a vital element of the pedagogical mission of the university. Students report many positive interactions with educators. Adoption of a process to grant temporary accommodations "to the end of the next term"; the automatic 3-day extension for missed assessment using the 'Self-Declaration of a Brief Absence form'; and dedicated unit/Faculty staff and embedded QSAS Advisors are seen as having a positive impact for students. At the same time, many educators are striving to adopt UDL principles and practices.

"When 50% of a fourth-year seminar course have accommodations—do not call on in class, cannot do presentations, does not need to engage in discussion—it is impossible to have a seminar course."

"With 120 students in the class, you don't know their names, nor can you remember or identify which 10 students are 'not to be called on or asked questions.' So you call on no one."

Despite these positive reports, there is also consistent agreement that the current system is doing little to build a culture of accessibility and inclusive education at Queen's. The validity of accommodations approved is questioned. Concerns were raised regarding the ability of the system to tailor accommodations to individual students and/ or course/subject content or structure; receipt of accommodations being reliant on the assigned QSAS Advisor; and the evidence behind the rationale for some accommodations. The drop-down menu options available through the Ventus system is seen by students and faculty as evidence that all must conform to a set of predetermined accommodations; unique situations/requirements or those that demand other than

the most used accommodations cannot be provided. This limitation was particularly highlighted by graduate students and faculty from professional programs. Students and QSAS Advisors report that a change in an Advisor could result in different accommodations being approved, leading some to question whether there are clear enough standards of documentation and interpretation. Finally, many faculty highlighted research evidence against multiple and repeated extensions to assignments for students with test or assessment anxiety. They questioned the capacity of the system to differentiate between test anxiety and more profound mental health concerns.

Implementation consistency and fairness were also questioned. From the student lens, there is inconsistency in how educators implement accommodations (individually, within and across units). While many applauded the new Exams Office facilities, we received many reports of students being denied access to approved accommodations at the Exams Office because proctor information was inaccurate or incomplete. With no way to access Letters of Accommodation (via Ventus or other procedure) and being unable or unwilling to accept Letters of Accommodation provided by the student, the result is, at best, unnecessary stress and, at worst, lost

time or even cancelled exams. Other violations by the Exams Office (denied use of computers or course-specific software, provision of paper copies of exams) were heard, as was an ongoing need to advocate for approved accommodations. From the educators' lens, a list of inflexible accommodations is provided without guidance or dialogue regarding fit to course or guidance on implementation. For them, approved accommodations feel vague, open-ended, or not implementable (how can an instructor in a lecture hall of 300 students that is available 10 minutes before class starts implement "priority seating" at all and without identifying or "outing" the student), leaving them unsure how to proceed with what is and what is not "allowed". In contrast, the QSAS lens sees faculty as challenging their authority to determine accommodations and resistant to implementing approved accommodations or changes to curriculum.

> *"She knows that she will be negatively affected as it will take her more than eight hours to complete the exam given that she has to read the questions and she also has to take time out to eat. She is also confident that all of the students who do not need extra time will use the full eight hours and therefore this scenario is not at all fair."*

With no clear statement on how accessible and inclusive pedagogy/andragogy is defined, students, staff and educators report confusion related to UDL. Faculty implement UDL believing it levels the playing field, then perceive that accommodations are approved without regard for the structure and nature of the course or existing UDL practices. They report no opportunity to discuss or engage in dialogue to resolve concerns. Students, QSAS Advisors and some senior leaders believe that UDL is being used by faculty to avoid providing approved accommodations, raising the issue as evidence that faculty do not understand their "duty to accommodate" under the law. Principles or guidelines to understand if and what measures might be needed in addition to UDL to accommodate the individual disabled students fully do not seem to be available or discussed.

Evidence of diverging perspectives was also seen regarding mandated recording of classes and the protection of intellectual property; the desire *to*, versus the instruction *not to* obtain consent from guest lecturers and other students to record presentations; maximum time to complete one or more courses in a semester (ex: how many extensions and for how long) and alternative pathways to program completion; and declaration of essential course requirements.

Certainly, animating these conflicts are significant resource gaps that prevent faculty and staff from adequately responding to student accommodation needs. There was almost unanimous agreement that the volume and complexity of student needs has increased significantly, with many dating this since the start of the COVID-19 pandemic. Proof that this is more than a perception by faculty and staff is seen in the data presented in section 1.4. For QSAS, this has meant many students are unable to book additional or timely appointments with Advisors and they have limited opportunity to follow up later in the year to evaluate if accommodation needs are being adequately met. For faculty, it has meant receiving simultaneously complex and, at times vague accommodation requests without any support to track, discuss or implement these changes

within courses that have already been planned or are already in progress. Put simply, they are expected to *do* but are not provided with information or resources to enable the *how*. Some Faculties and units have attempted to bridge the resource gap by hiring Faculty-specific staff to assist either or both the accommodation and consideration processes. In other instances, these duties are merged with the responsibilities of academic advisors. While it was almost impossible for reviewers to determine the number of additional staff hired across the university, the cost of providing student accommodation clearly extends far beyond those attributed to Student Affairs. It is also clear that the patchwork of solutions means that processes are implemented differently, and students (and faculty) are required to navigate very different and, at times, contradictory systems depending on the unit offering the course.

The impact on faculty workloads of the increased numbers is hard to quantify. While approximately 20% of the Queen's student body receive accommodations, the number in individual classes varies with reports anywhere from 20-50% of students in typical class. This means that in a class of 85 there could be up to 43 students with an array of accommodations needed to make the course accessible. Faculty workload increases include the labour

associated with all forms of assessment, such as producing multiple versions of exams or quizzes with multiple deadlines, along with the need to organize invigilation and reschedule assignments again when there is a need for additional relief. There is also untracked labour associated with changes in teaching practices, such as adopting UDL principles, which can take significant time and effort to learn and implement. Faculty also report work associated with courses regularly extending beyond the end of term, reducing hours available for future course preparation and teaching. Work extending beyond terms means that TAs and adjuncts are no longer employed, leaving the course instructor or program leadership to find alternative means to assess late submissions. The volume of work associated with the diversity of individualized accommodation needs has overwhelmed many faculty. As one respondent puts it, "…if something isn't done, there will be resignations."

The unfortunate outcome of these differing viewpoints and increased labour is the impact on learning and teaching and, therefore, on students. Faculty describe the changes to their teaching, particularly the assessment components, as leading to less innovation, the implementation of fewer best-practices and reduced quality of pedagogy. Reported changes to assessment include:

- reducing the number of assessments in a course to a midterm and final exam,

- stopping in-class tests and weekly quizzes (time extensions cannot be met and answers cannot be released, compromising student learning),

- limiting or eliminating laddered learning, and

- eliminating group assignments and presentations (accommodations are easier to manage with individual essays, and other students in group assignments are not disadvantaged by extended individual deadlines).

Reported changes to classroom learning include:

- limited discussion of controversial topics/unpublished research to avoid recordings,

- more didactic time: reduced time in discussion, presentations, seminars and tutorials, and

- less available TA support as their time is being used to track and manage the administration of accommodations.

4.4 IDENTIFIED BARRIERS AND CHALLENGES – DIGITAL LEARNING AND TECHNOLOGY

Learning and teaching, at all institutions and for all students is now fully or partially supported by digital platforms. Whether learning is synchronous or asynchronous, content management or learning management systems are consistently used. Synchronous

virtual learning is often augmented with additional digital solutions. Ensuring seamless system integration with other university systems, for example, the Registrar's office and Library system, is integral to student learning and experience.

Digital technologies for disabled students can and do extend beyond those used by all students. For example, screen readers, voice-to-text software, and specific learning applications are used. The ideal is accessible, compatible, and seamless integration of both mainstream and disability specific solutions. In its published plan, Paving the Road to our Digital Future, Queen's Information Technology Services (IT Services) aspires to this ideal.

> From Paving the Road to our Digital Future Queen's Information Technology 2020-2023
>
> *"Inclusion. Our digital environment will be designed with diversity and equitable access in mind and will address the needs of all discipline and areas of study."*
>
> On student experience: *"…mobility and equity: anywhere, anytime, any resources, any devices and any accessibility need met."*
>
> *Source: https://flipbooker.com/user_files/html/d22da5e4-2401-40a0-bbd1-c3d74440c96e/index.html#1*

In the last few years, Queen's University has added several administrative and learning software packages to improve services for disabled students. The reviewers consistently heard positive reports regarding the addition of the Ventus system – in fact, for some respondents, it was the only positive aspect of the system. Ventus is credited as a significant improvement in the accommodation process, providing a centralized and secure platform for managing and accessing Letters of Accommodation, tracking student accommodations, and streamlining administrative processes. The automated

system means students no longer must send Letters of Accommodation manually by email. Faculty associate it with a decrease in their workload. Critical to some students, the improvements in onQ and compatibility with screen readers has been positive. Reviewers also appreciated the work done by the Accessibility Service and Adaptive Technology Centre housed in the Queen's Library where access to alternative format textbooks and coaching on software are provided.

> *"The system of getting notes for classes is not effective. I've been a note-taker before, and I know for a fact that my friends who need notes don't always get them due to a lack of volunteers."*

Alongside the positive comments, reviewers consistently heard concerns related to solutions related to notetaking and adoption of new digital solutions. Many also called for greater use of Ventus, providing suggestions and ideas. NoteQ and GLEAN, both newly purchased and implemented, were intended to replace the previous system of volunteer notetakers, regarded as unreliable and of poor quality. Unfortunately, neither have been met with the same positive response as Ventus. GLEAN's

effectiveness is limited based on seating location and instructor use of a microphone. The platform is also dependent on physical attendance, meaning GLEAN is not a solution during illness or absence. Faculty members have substantive concerns with the use of mandatory recording. The "rules" regarding who must obtain and give consent are unclear, with some voicing grave concerns that guest lecturers and student presenters are not to be told that they are being recorded. Current stories of the use and misuse of AI raise concerns about where the recordings are housed and the potential for voice theft and the spread of false information. Finally, while recognizing the importance of accessible learning, faculty voice concerns that mandatory recording can have a negative impact on the learning environment itself, suggesting that discussion on sensitive matters is curtailed.

Many respondents believed the selection and purchase of disability-related software by QSAS to be problematic. They describe how selection and implementation had been done unilaterally, without consultation or notice and independent of an accessibility or university-wide digital strategy. There is little doubt that the frequently reported lack of consultation and integration with the broader strategy has contributed to consistent implementation

failures. Implementation of the Ventus system, for example, was delayed for a year at the insistence of the Centre for Teaching and Learning and lead by the office of the CIO, due to expressed concerns. Additional consultation regarding potential impact and the development of an implementation plan likely accounts for the positive response to Ventus. Lessons learned, however, were not repeated with the subsequent introduction of GLEAN and NoteQ which were rolled out without consultation, notice, or training and after the term had begun. The prevailing belief at Queen's is that the QSAS office is responsible for the failures. This legacy will be difficult to overcome.

Overall, it must be recognized that the volume of students seeking accommodation and the wide variety of the types of accommodation needed is challenging for all in the Queen's community, and the institution must adapt accordingly with respect to ensuring the requisite resources required for fair and timely accommodation are available, accessible, and equitably deployed across the university. In doing so, the institution must recognize that providing a wide range of academic accommodations for a large percentage of a class is very time-consuming, and while instructors may be very committed to providing the

best possible academic experience, they often need additional support and resources to do so.

4.5 IDENTIFIED BARRIERS & CHALLENGES – PHYSICAL AND ARCHITECTURAL

Like other Ontario universities, Queen's is a campus composed of old buildings that were not constructed with physical accessibility in mind. For many of these buildings, based on their age and configuration, it would be quite costly to renovate to current accessibility standards. For other buildings, they must legally remain inaccessible as they are designated heritage buildings, limiting the types of modifications that can be made to the exterior of the structure. As part of our review, we heard from respondents and witnessed ourselves plenty of spaces that were either partially or wholly inaccessible to mobility devices and would require substantial renovations to be made accessible. We also heard stories of difficulties navigating campus in the winter, particularly on icy or snow-covered sidewalks, that can limit access. These physical barriers, of course, represent a real challenge for campus members with physical disabilities.

At the same time, the volume of inaccessible spaces at Queen's does not appear out of line with other campuses of comparable size and age. This is, in part, because of

the exemplary work being completed by the Facilities team at Queen's through the development of the Queen's University Facilities Accessibility Design Standard (QFADS). These standards, along with the work of the Built Environment Committee, comprised of students and faculty with disabilities, are successfully guiding the refurbishment, renovation, and new builds on campus. We can confirm that the QFADS go well beyond the minimum building standards for accessibility and will help to ensure all new buildings, and those undergoing substantial renovation will offer an acceptable level of physical accessibility on campus going forward. Several respondents spoke positively of the recent renovations to Mitchell Hall, especially the newly designed Exams Office, and we were similarly impressed with the accessibility features of the new Albert Street Residence that was opened in 2022. Finally, we were also impressed by the digital wayfinding application, the Queen's University Interactive Map, which allows community members with Internet access to specify the need for accessible routes when receiving directions around campus.

One significant challenge currently limiting the effectiveness of the QFADS is the separation between centrally managed and Faculty-managed spaces. While classrooms managed centrally are being systematically

refurbished following QFADS guidelines, many Faculty-run spaces remain inaccessible with no clear plans to improve access in the future. It is important to ensure that Faculty retained spaces are updated in a timely manner and that they comply with QFADS.

5   RECOMMENDATIONS IN PRIORITY SEQUENCE

5.1   OVERARCHING RECOMMENDATIONS

Preamble: It is crucial that the University re-imagines, reframes and restructures how disabled students engage in the student experience at Queen's by implementing an academic success framework. This approach requires providing for accessibility and inclusion rather than relying predominantly on the provision of 'Letters of Accommodation' and basic compliance with AODA requirements. This change in culture, attitude and method requires investment in a change management strategy that integrates the commitments and values of inclusion into daily practice and communicates that commitment in a transparent and understandable way to all students, faculty and staff.

5.1.1   TO BE COMPLETED BY DECEMBER 31, 2024

Recommendation 1) Appoint a Senior Academic Leader for Accessibility, reporting directly to the Provost, whose primary responsibility is to embrace, lead and be held accountable for facilitating a new,

university-wide vision that creates, maintains and promotes a just and inclusive environment underpinned by accessible pedagogy. Annual targets paired with measurable outcomes will be publicly reported, potentially via an easily understood scorecard. Examples of measurable outcomes include: retention and graduation rates of disabled students, length of time taken to complete degrees by full and part-time disabled students, accessibility-based course evaluation aggregate data, and the number of academic appeals based on the denial of accommodation.

Recommendation 2) Establish a university-wide committee to advise on the provision of accessible and inclusive education, entitled ACE (denoting accessibility, community and equity at Queen's), composed of faculty, staff, students, and administrators with a minimum of 50% of disabled members, to advise the Senior Academic Leader on strategic priorities and implementation plans. Ensure a public call for membership is widely circulated and provide all selected members with the requisite resources to participate fully based on the role they fulfill and commensurate with the work required of committee members. The newly established Queen's Senior Accessibility Advisory Group, intended to ensure

compliance with the Accessibility for Ontarians with Disabilities Act (AODA) will report to ACE. The establishment of ACE supersedes the need for the existing Advisory Committee on Academic Accommodations (ACAA).

Recommendation 3) Provide an improved, clear pathway for timely student access to and coordination of all accessibility services by integrating existing services to ensure students receive coordinated and comprehensive support for learning on a timely basis.

Within two years, establish an Accessibility & Student Success Centre, outside of the Student Affairs portfolio, and reporting to the identified Senior Academic Leader for Accessibility. The objective of the new reporting structure is to meaningfully shift the emphasis to accessible pedagogy rather than characterising disability as a health and wellness issue. At minimum this Centre should include:

- Academic Advising
- Adaptive Technology Centre
- Accommodated exams & facilities administered by the Exams Office
- Library Accessibility Services

- Office of the Adaptive Technologist
- Office of the Accessibility Coordinator
- Queen's Student Accommodations Services (QSAS)

Note: Facilities Management and the CIO must be consulted regularly before creating new programs to ensure accessibility has been provided at the highest level possible. This Centre should also work closely with Student Health and Wellness to provide and receive referrals.

Recommendation 4) Furnish the Exams Office, or otherwise make available devices, software, and platforms that align with course demands and are compatible with student required assistive technology. Ensure staff have knowledge and training to set up and troubleshoot approved technology accommodations.

Recommendation 5) Implement a mechanism to ensure that the cost of a degree is the same for disabled and non-disabled students, for example, through the use of tuition reimbursement or fee waiver, as some disabled students must take a reduced course academic load, which increases the cost and extends the time it takes for them to complete their degree. Examples of readily transferable

policies in place in comparable Canadian universities that reduce this inequity can be easily sourced for reference.

Recommendation 6) Ensure all Offers of Admission include detailed information on accessibility at Queen's and how and when to register with QSAS.

Recommendation 7) Ensure the provision of a consistent, transparent and learning-oriented student experience at the QSAS by:

- critically assessing and improving the intake process so that it is straightforward, accessible regardless of disability and requires the least investigative or advocacy demands on students,
- publishing explicit eligibility criteria,
- establishing and applying internal standards and guidelines to ensure consistency in assessment processes and application of eligibility criteria and that include provision for differing types of accommodation and support for graduate students, undergraduates in both full and part-time programs,
- establishing and applying internal standards and guidelines, including consultation with faculty, in the determination of appropriate, tailored and customized accommodations,
- putting in place a reliable full-time receptionist so that emails and telephone calls are answered in real-time, as much as possible and if voicemails must be left, there is a timely response, and those with

appointments and dropping in are directed to the correct person or resource,

- arranging for a workplace assessment to be conducted and arranging for team building and leadership development strategies to be implemented, on an interim basis,

- clearly stating how the number of students assigned to each QSAS Advisor is determined and publicizing the number of students assigned to each Advisor, and

- putting in place and publicizing the process students can implement when they disagree with the assessment of QSAS not to provide accommodations or to provide insufficient or inappropriate accommodations.

  - We propose that arrangements be made for an impartial review by an external Academic Accommodations expert located at another University, e.g., the Director of the Office for Student Accessibility. The expectation is that with the student's permission, only their anonymized documentation would be provided to the external reviewer, and the external reviewer would then prepare their professional assessment with detailed reasons and a completed Letter of Accommodation for review by QSAS and the student.

Recommendation 8) Collect and publicly report on a regular basis sufficient data to reliably and comprehensively describe the volume and

demographics of students receiving accommodations, trends and changes over time, quality of the student experience, and types of services provided.

Recommendation 9) Recognizing that it will take time for the ACE Committee to be established, the Provost and Vice-Principal (Academic) immediately establish a small, time-limited working group, with both faculty and student representatives, to investigate the most contentious and pressing accommodation failures/conflicts and propose remedies. The issues to be resolved as quickly as possible include, but should not need to be limited to:

- the misunderstanding, confusion and dissatisfaction with the QSAS-designed and mandated 7-day extension accommodation and its use in combination with the Self-Declaration of a Brief Absence. The frequently expressed concern regarding the value of a standardized 7-day extension, in all learning environments and for all forms of evaluation must all be addressed,
- who has the authority to determine the suitability of dropping, delaying or reweighting assignments and/or finding other alternatives to meet course essential requirements,
- who determines if and how retroactive accommodations are granted,

- possible/perceived violations of confidentiality and intellectual property through the use of mandated technology such as GLEAN or NoteQ and approved alternatives, and

- under what circumstances is implementation of accommodations beyond the sole responsibility of a course instructor (for example technology and support to provide virtual or hybrid classes, labs, fieldwork) and the subsequent procedure to provide approved accommodation.

Recommendation 10) Undertake a university-wide analysis to determine the total amount of staff time (including Faculty-specific resources) dedicated to providing support for academic accommodation and considerations. Use that data to plan for and ensure sufficient resources are allocated to each Faculty.

Recommendation 11) As the level of accessibility should not differ from Faculty to Faculty, resource all Faculties to provide the same level of administrative and educational support to their students. Ensure that all the staff positions are posted on Faculty, Department, and QSAS websites stating what each position is responsible for and to whom they report in order to increase ease of access to the 'right' resource person, staff member, or group in a timely and efficient manner.

Recommendation 12) The Centre for Teaching & Learning (CTL) take responsibility for organizing regularly scheduled networking and professional development opportunities for staff who work in different Faculties but in the same or similar positions, supporting students and faculty to implement academic accommodations, to collaborate and share knowledge.

5.1.2   COMPLETED BY JUNE 30, 2025

Recommendation 13) Develop a note-taking and classroom recording policy for Senate approval, addressing:

- how and when digital platforms (such as existing classroom lecture capture facilities, GLEAN, and integration with onQ are appropriate) can be used and what appropriate alternatives (such as paid note-takers or instructor provided summaries and notes) can be used when necessary. It is strongly recommended that trained and paid notetakers replace volunteer notetakers,

- how issues of privacy/confidentiality (such as in-class discussion) are to be managed, both through disclosure of recording or preventing recording during discussion with alternative notetaking provided,

- how to maximize the use of existing classroom lecture capture facilities, and the production of digital transcripts,

- accessibility standards for generated transcripts and digital files and their safe storage, e.g. the use of existing note-share platforms (NoteQ) and co-location of paid note-taker notes is recommended,

- how disputes over intellectual property and recording software using AI transcription can be resolved in a timely and fair manner, and

- under what circumstances the provision of instructor-generated notes fulfills the duty to accommodate and when additional recording/transcription services are unnecessary.

Recommendation 14) Create and promote a space on campus for disabled students to meet, connect and offer mentorship to each other following successful models like Yellow House or Four Directions.

5.1.3   COMPLETED BY DECEMBER 31, 2025

Recommendation 15) Conduct a thorough and joint policy review, remove conflicting elements, reduce confusion and align when and how the Academic Accommodations for Students with Disabilities Policy and the Academic Considerations for Students in Extenuating Circumstances Policy work independently and in combination.

87

A time-sensitive Dispute Resolution mechanism must be included in the Academic Accommodations for Students with Disabilities Policy that provides for an arms-length process to objectively review and make enforceable decisions that will support students, faculty and accommodation staff to resolve issues of implementation within the term on a quick-turnaround basis as well as providing for a formal appeal process [17]. It is emphasized that decision-makers must be trained in the principles of natural justice and administrative fairness and be aware that they are not allowed to inquire into a student's diagnoses and may only review the Letter of Accommodation and may not request additional medical documentation.

Recommendation 16) Create an institution-wide, 5-year accessibility plan, which is rigorously assessed for progress made at years 2 and 4, with year 5 spent building the next 5-year plan through campus-wide consultation. The plan should lay out a pathway to accessible and inclusive education, clarify the philosophy and accessibility values Queen's seeks to enact system-

---

[17] The suggested *Dispute Resolution Process*, including both informal and formal methods, can be found in Appendix A.

wide and identify key performance indicators (KPIs) to ensure accountability for and efficacy of these plans.

Recommendation 17) With senior leadership guidance and endorsement, consultation with ACE and all relevant stakeholders, develop a university-wide Accessibility Digital Strategy. The strategy should ensure that:

- The Chief Information Officer holds key responsibility, while consulting with University Relations, the VPECI and is informed by the AODA framework for:
  - the purchase of all disability-related or accessibility-specific software, applications and platforms that impact teaching and learning, and
  - ensuring all purchases are subject to compatibility, cybersecurity, privacy and intellectual property safeguards and undergo a process of consultation; and are subject to adequate pilot testing and education prior to roll-out and are not left to the discretion of a single unit.
  - establishing an Accessibility Assessment Framework comparable to the Privacy and Security Framework, which is applied prior to the approval to purchase any digital platforms and technology. This framework should exceed accessibility guidelines such as WCAG 2.1 AA, the Canadian Guideline on Making Information Technology Usable by All, the US Access Board

Information and Communication Technology guidelines, or the University of Washington Universal Design of Information Technology in Postsecondary Education guide.

5.2 ORIENTATION AND ONGOING EDUCATION RECOMMENDATIONS

PREAMBLE: The importance of all community members taking steps to improve accessibility and provide accommodation, consistent with their specific role, must be communicated clearly and consistently on a University-wide basis. The onboarding process and ongoing education and professional development must include in-depth education on ways and means of increasing accessibility.

5.2.1   COMPLETED BY JUNE 30, 2025

Recommendation 18) The orientation and ongoing education for all staff, faculty (adjunct, full-time, part-time) and TA roles should focus on:

- addressing disability myths/misperceptions (e.g., not all disabilities are apparent, not all diagnoses look/function the same, nature of, and the existence of, episodic disabilities, the conscious and unconscious prejudice people without disabilities may hold about disabled students and colleagues, etc.),

- the institutional resources available for increasing accessibility (for example, Library Accessibility Services, Office of the Adaptive Technologist, Office of the Accessibility Coordinator) and the individual responsibility for doing so consistent with the role occupied and

- the role of QSAS intake coordinators and advisors, the use of VENTUS and the most effective means of implementing academic accommodations.

Recommendation 19) Enhance training systems for proctors within the Exams Office by requiring that all proctors:

- demonstrate familiarity with standard exam accommodations offered by QSAS,

- follow written procedures consistently to administer and implement all standard exam accommodations and

- when a disagreement on approved accommodations and/or their implementation occurs between the student and the proctor, the proctor consults with an Exams Office Supervisor immediately and takes all necessary steps to ensure disputes are resolved in a timely and amicable manner.

Recommendation 20) As part of Queen's orientation program, all students should receive information on Queen's commitment to increasing accessibility including, why accessibility is crucial to a humane

91

and civil academic community and how Queen's supports disabled students. All students should receive information on:

- the rights disabled students do/don't have within the academic setting,
- what an academic accommodation is and is not,
- how accommodations function and the types available,
- how disabled students can access QSAS, what types of documentation is required and timelines for implementation, and
- how to contact and work with faculty to discuss accommodations.

5.3 ASSESSMENT, CURRICULUM AND INSTRUCTION RECOMMENDATIONS

PREAMBLE: To create, build on and maintain an accessible learning and teaching experience, resources and creativity must be dedicated to supporting faculty and staff in these endeavours. While UDL does not eliminate the need for accommodation, the principles should be imbedded wherever possible.

5.3.1 COMPLETED BY DECEMBER 31, 2024

Recommendation 21) The Centre for Teaching & Learning will make recommendations on:

- a UDL teaching modality that is effective, flexible, and easily transferable, implemented widely through the appropriate channels, both Faculty based and centrally,

- under what conditions UDL practices "level the playing field" and when they do not, such as universally applied time-based extensions in conflict with time-based accommodations, and

- provide standardized education on UDL practices for general application on a regularly scheduled basis as well as customized to very specific learning environments, on request.

Recommendation 22) Extend appropriate access to Ventus so that specific service providers, such as the lead proctor for the accommodated Exams Office and Adaptive Technologists in the Library, can access Letters of Accommodation to better support disabled students.

5.3.2 COMPLETED BY DECEMBER 31, 2025

Recommendation 23) The Centre for Teaching and Learning will lead and empower an Accessibility Community of Practice, composed of faculty, staff,

and students, including those with disabilities, to work closely with the ACE Committee to:

- develop consensus statements on accessibility standards for lectures, seminars, experiential learning, etc.,

- develop implementation Q&A sheets to guide the implementation of typical accommodations. This could include the development of:

  o information sheets defining and giving examples of standard QSAS accommodations, alternate assignments guides, with examples from actual learning environments, a database of sample assignments informed by UDL principles, comprehensive Access Checklists to be used when doing course development, recommendations for how to develop a process to provide for alternative, equivalent instruction when programmatic accommodation is indicated (for example, required course substitution to meet program requirements)

- build on existing, though preliminary work, to create a policy and practice for graduate student supervision and assessment, such as comprehensive exams and oral defence, and

- in consultation with faculty, students, and staff optimize the use of Ventus by exploring and adding features that reduce duplication of requests, provision of alerts as to upcoming requirements, etc.

Recommendation 24) ACE to develop a process to provide alternative, equivalent instruction when programmatic accommodation is indicated, e.g. required course substitution to meet program requirements.

5.4 PHYSICAL AND ARCHITECTURAL RECOMMENDATIONS

PREAMBLE: While recognizing the challenges of century-old buildings, Queen's has a robust, systematic approach to improving accessibility of the physical environment. The Queen's University Facilities Accessibility Design Standards (QFADS) set a standard well above the minimum required by the AODA and the building code.

5.4.1   COMPLETED BY SEPTEMBER 1, 2024

Recommendation 25) Provide a mechanism, such as a specific emergency helpdesk number, that is widely publicized to text or call when unpredictable situations occur, e.g. immediately unlock doors so that students can attend class; alternatives to malfunctioning accessible doors be offered, and doors immediately repaired.

5.4.2　NO END DATE

Recommendation 26) Continue to refine and build on the innovative Queen's University Facilities Accessibility Design Standards (QFADS) and the strategic plan for increasing the accessibility of the Queen's facilities, including all Faculty-managed facilities.

6   APPENDICES

6.1   APPENDIX A: DISPUTE RESOLUTION PROCESS

PREAMBLE: The dispute resolution processes for addressing disagreements regarding the implementation of approved accommodations within post-secondary education environments, take many forms and to date, there are no published, evidence-based 'best practices' or guidelines. This proposed approach is built on the premise that every opportunity should be taken to resolve concerns as early in the semester as possible and that all discussions and disagreements are conducted in an amicable manner with the knowledge and expertise of all involved being respectfully considered. In addition, provision is made for a definitive conclusion to be made in a timely manner by an impartial decision-making body, given the expressed desire for finality put forward by many students, faculty and staff.

DISPUTE RESOLUTION PROCESS

If an instructor needs assistance with determining how to implement an approved accommodation or for

clarification of any aspect of the Letter of Accommodation, the first step is to discuss their concerns and seek advice from the student's QSAS Advisor. This type of consultation must be assigned priority status by QSAS.

If a student is advised by an instructor that the approved accommodation cannot be implemented, the first step is to speak with their QSAS Advisor. This type of discussion must be assigned priority status by QSAS.

Part A: Informal Procedures

If after consultation with QSAS, the instructor believes it is not possible to or refuses to implement the approved academic accommodation, the student may request their Advisor initiate an informal review of the instructor's decision to deny the approved accommodation.

Students may choose to by-pass the informal appeal process and proceed to the formal appeal process at any time.

The informal review process includes the following steps:

1. The student should ask their QSAS Advisor to discuss the matter with the instructor to clarify any

questions or concerns the instructor has with implementing the approved accommodation.

2. If, following consultation with the instructor, the instructor continues to deny the approved accommodation, QSAS shall, with the agreement of the student, discuss the dispute concerning the approved accommodation with the Chair/Director responsible for the course and request their intervention. The student may participate in the discussion if they choose to do so. The Chair/Director may:

   a. Direct the instructor to provide the approved accommodation;
   b. Support the instructor's decision that the approved accommodation cannot be implemented given the specific circumstances; or
   c. Refer the matter to the Faculty Dean.

3. If, following consultation with the Chair/Director, the approved accommodation is not implemented, QSAS shall, with the agreement of the student, discuss the dispute concerning the approved accommodation with the Faculty Dean (or designate, who has had no previous involvement) responsible for the course and request their intervention. The student may participate in the discussion if they choose to do so.

Instructors who have been directed by a Chair/Director to provide an accommodation they believe can not be implemented may also appeal to the Dean (or designate, who has had no previous involvement). The Dean may:

    a. Direct the instructor to provide the approved accommodation,

    b. Support the instructor's decision that the approved accommodation can not be implemented given the specific circumstances, or

    c. Refer the matter to the Academic Accommodations Appeal Committee.

Note: In the case of a graduate student, the Faculty Dean shall consult with the Dean of the School of Graduate Studies and Post-Doctoral Affairs prior to making a decision.

Part B: Formal Appeal Procedures

1. If the dispute concerning the approved accommodation is not resolved during the informal review process, the student may appeal to the Academic Accommodations Appeal Committee. Or, students may by-pass the informal appeal process

and proceed to the formal appeal process at any time.

2. The Academic Accommodations Appeal Committee, (the Committee), is a Standing Committee of Senate appointed by Senate. The Appeal Panels will be drawn from the Committee membership and consist of one faculty member, one student, and one academic accommodations expert from the Human Rights and Equity Office. The VP, ECI will serve as the non-voting Chair of the Committee.

3. Appeals will be submitted to the Office of the Provost. The appeal request should state the reasons on which the appeal is based and provide supporting documentary evidence, e.g. Letter of Accommodation, course outline, email communication with instructor, etc. Normally, the appeal will be heard within five working days after receipt of the appeal request. The original decision made by the Dean will remain in effect until the appeal process is completed.

4. The instructor for the course must present their expectations of competencies for the course as articulated in the course outline; and the essential course requirements or the academic standard that would be compromised in their reasons for their

inability to or for refusing to implement the approved accommodation. Instructors may present their case in writing to the Committee or may make their presentation in person at the Committee meeting. A representative from QSAS will present the rationale for the approved accommodation based on:

a. The information contained in the Letter of Accommodation,

b. An understanding of Queen's legal obligations, and

c. An understanding of the instructor's course requirements.

Students may rely on the rationale presented by QSAS in support of the approved accommodation. In addition to the QSAS presentation, students may also choose to present their own case in writing to the Committee or may make their own presentation in person at the Committee meeting.

5. Instructors who wish to appeal a decision to accommodate made by their Faculty Dean may also submit a formal appeal to the Committee. The appeal should state the reason for the appeal such as how the instructor believes the accommodation threatens the essential academic requirements of the course.

6. Normally, the Panel hearing the appeal will be composed of a minimum of 3 members, i.e., 1 faculty member, 1 student and 1 academic accommodations expert from the Human Rights and Equity Office. A Panel of 5 decision-makers, made up of 2 faculty members, 2 students and 1 academic accommodation expert, can be composed if the subject matter is particularly complex.

7. The Committee will make a decision regarding the case based on the merits of the case, considering the University's legal obligations under the *Ontario Human Rights Code*, the *Accessibility for Ontarians with Disabilities Act* (AODA) and Queen's Academic Accommodations for Students with Disabilities policy. Decisions will be made based on principles of procedural fairness and natural justice and all decision-makers will engage with mandatory training on these principles, on an annual basis.

8. Normally, the Committee will inform both the student and the instructor of its decision within two working days after adjudication of the appeal with a written decision to follow in five working days.

9. The decision of the Committee shall be final.

Note: A new Standing Committee of Senate will be required:

Academic Accommodations Appeal Committee

Terms of Reference

1. The authority of the Committee derives from the policy "Academic Accommodations Policy for Students with Disabilities" (the Policy) approved by Senate on Nov.1, 2016.
2. The members of this committee, who are appointed to serve as decision-makers, shall consider and decide appeals with respect to academic accommodations for students with disabilities consistent with the process and requirements of the Policy. The Committee shall determine the appropriate length and format of written or oral submissions, with particular consideration of the confidential nature of accommodation requests and the need for expeditious hearings and decisions.

The decisions of the Committee are final.

3. The Committee may recommend changes to the Policy through the Secretary of Senate.
4. The Committee reports annually to Senate on its activities.

Composition:

1. One faculty member and one student from each Faculty and the School of Graduate Studies and Post-Doctoral Affairs, who are knowledgeable about academic accommodation policy and procedure.

2. Two Representatives from Human Rights and Equity Office appointed by the VP of Culture, Equity and Inclusion (CEI).

3. Vice-President (Student Affairs) (This role does not include adjudicating appeals).

4. University Registrar (This role does not include adjudicating appeals).

5. Senior Advisor or Manager of QSAS (This role does not include adjudicating appeals).

6.2 APPENDIX B: RESULTS OF ANONYMOUS ONLINE SURVEY

- 814 people opened the survey.

- 59 people did not answer any of the questions, leaving a total of 755 usable surveys.

Table 1: Respondent Demographic Information

Affiliation	Identify as Having Disability			
	Yes	No	Missing	Total
Student	221	253	6	480
Instructor/ Professor	34	148	9	191
Staff/ Administrator	19	65	0	84
Total	274	466	15	755

- Of the 755 usable surveys, 15 people choose not to disclose either their affiliation or disability identity.

- Of the 480 student respondents, 240 indicated they were registered with QSAS.

- Almost 50% of respondents were from the Faculty of Arts and Science.

Table 2: Distribution of Respondents by Faculty/Administrative Unit

Affiliation	Instructor/ Professor	Staff/ Administrator	Student	Total	% of Overall Total

Faculty of Arts & Science	122	24	215	361	48.78
Faculty of Education	6	3	61	70	9.46
Faculty of Engineering & Applied Science	10	4	47	61	8.24
Faculty of Health Science	18	3	50	71	9.59
Faculty of Law	9	5	57	71	9.59
School of Business	14	8	7	29	3.92
Student Affairs	0	30	0	30	4.05
All Others	3	4	20	27	3.65
Missing / Choose Not to Answer	0	3	17	20	2.70

Total	**182**	**84**	**474**	**740**

Table 3: Mean scores for each question - by status/role

Affiliation	Q-1	Q-2	Q-3	Q-4	Q-5	Q-6	Q-7
Instructor/Prof.	4.4	4.3	7.4	5.0	5.3	7.4	7.6
Staff/ Admin.	5.4	4.8	5.8	4.9	5.3	5.6	6.0
Student	5.9	5.4	5.7	5.5	5.5	6.0	3.5
Grand Total	**5.4**	**5.1**	**6.2**	**5.3**	**5.4**	**6.3**	**5.0**

Q-1 The current accommodations system at Queen's works well.

Q-2 The process to obtain a disability-related accommodation at Queen's is difficult.

Q-3 Students always receive approved disability-related accommodations in courses at Queen's.

Q-4 I rarely know who the "right person" is to contact at Queen's for information on accommodations.

Q-5 Clear information about accommodation policies and procedures at Queen's is easy to find.

Q-6 Instructors implement accommodations in a timely manner.

Q-7 It is too easy for students to receive disability-related accommodations at Queen's.

Table 4: Mean scores (students only) for each question - by registration at QSAS or not

Student Registered at QSAS	Q-1	Q-2	Q-3	Q-4	Q-5	Q-6	Q-7
No	5.2	5.8	5.5	6.4	5.8	6.4	4.4
Yes	6.3	5.1	5.7	4.8	5.2	5.7	3.0
Grand Total	**5.9**	**5.4**	**5.7**	**5.5**	**5.5**	**6.0**	**3.5**

Q-1 The current accommodations system at Queen's works well.

Q-2 The process to obtain a disability-related accommodation at Queen's is difficult.

Q-3 Students always receive approved disability-related accommodations in courses at Queen's.

Q-4 I rarely know who the "right person" is to contact at Queen's for information on accommodations.

Q-5 Clear information about accommodation policies and procedures at Queen's is easy to find.

Q-6 Instructors implement accommodations in a timely manner.

Q-7 It is too easy for students to receive disability-related accommodations at Queen's.

Table 5: Mean scores for each question - by length of time at Queen's.

Time at Queen's	Q-1	Q-2	Q-3	Q-4	Q-5	Q-6	Q-7
less than 1 year	**6.3**	**5.4**	**6.2**	**5.5**	**6.2**	**6.5**	**3.8**
Instructor/Prof	9.5	10.0	1.0	2.0	7.0	9.5	10.0
Student	6.2	5.3	6.2	5.5	6.2	6.4	3.7
1 to 2 years	**6.1**	**5.1**	**6.3**	**5.4**	**5.2**	**6.1**	**4.3**
Instructor/Prof	6.2	5.0	7.5	4.4	6.0	7.2	5.4
Staff/Admin	5.8	4.3	6.2	5.4	5.7	5.3	5.2
Student	6.2	5.2	6.2	5.5	5.1	6.1	4.1
3 years	**5.2**	**5.7**	**5.3**	**5.3**	**4.8**	**5.1**	**3.7**
Instructor/Prof	3.9	7.5	7.3	2.6	7.0	6.0	7.7
Staff/Admin	4.8	4.9	3.4	4.3	4.3	4.1	4.6
Student	5.4	5.7	5.4	5.7	4.5	5.1	2.9
4 years	**5.5**	**5.0**	**4.9**	**5.6**	**5.5**	**6.0**	**3.5**
Instructor/Prof	5.1	3.4	7.6	4.2	6.0	8.5	6.4
Staff/Admin	5.0	3.0	9.0	7.3	4.7	7.0	6.7
Student	5.5	5.2	4.5	5.7	5.5	5.6	2.9
More than 5 years	**4.7**	**4.6**	**6.8**	**5.2**	**5.3**	**6.8**	**6.6**
Instructor/Prof	4.2	4.1	7.5	5.3	5.1	7.4	7.8
Staff/Admin	5.5	4.9	6.1	4.9	5.5	5.8	6.2
Student	5.4	5.4	5.6	5.3	5.7	6.4	3.8

Grand Total	5.4	5.1	6.2	5.3	5.4	6.3	5.0

Q-1 The current accommodations system at Queen's works well.

Q-2 The process to obtain a disability-related accommodation at Queen's is difficult.

Q-3 Students always receive approved disability-related accommodations in courses at Queen's.

Q-4 I rarely know who the "right person" is to contact at Queen's for information on accommodations.

Q-5 Clear information about accommodation policies and procedures at Queen's is easy to find.

Q-6 Instructors implement accommodations in a timely manner.

Q-7 It is too easy for students to receive disability-related accommodations at Queen's.
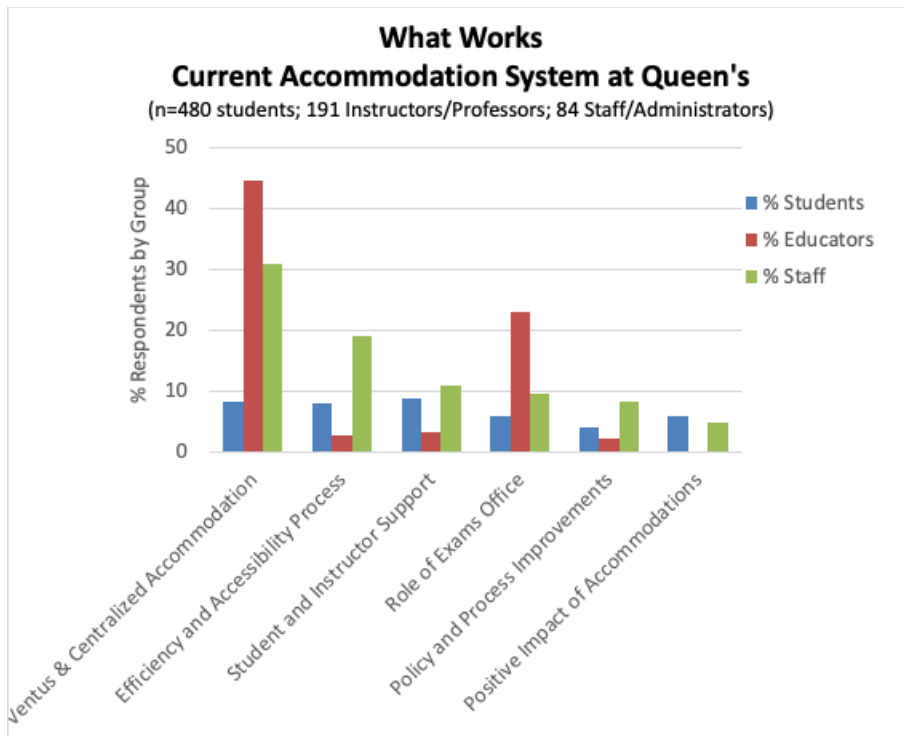
Responses to 3 Open-text Questions

What Works
Current Accommodation System at Queen's
(n=480 students; 191 Instructors/Professors; 84 Staff/Administrators)

% Respondents by Group

- % Students
- % Educators
- % Staff

Categories (x-axis):
Ventus & Centralized Accommodation, Efficiency and Accessibility Process, Student and Instructor Support, Role of Exams Office, Policy and Process Improvements, Positive Impact of Accommodations

Table 6: What is Working at Queen's – Description of Text Responses	
Ventus & Centralized Accommodation	Centralization of accommodation is positive. Ventus is an improvement in the accommodation process, providing a centralized, secure platform for managing and accessing Letters of Accommodation, tracking student accommodations and streamlining

	administrative processes. Both Ventus and the Exams office provide consistency across campus.
Efficiency and Accessibility Process	The process to obtain accommodations is transparent and straightforward, with online registration and fast access to both short-term and long-term accommodations. Not requiring formal diagnoses removes barriers for some students. The system helps reduce stigma and provides ample information and support.
Student and Instructor Support	QSAS staff and advisors are recognized for efficiently planning and administering exams for students with accommodations, responsive, helpful, and understanding. Instructors are generally willing to accommodate and work with QSAS, and there is a strong relationship between QSAS, the Human Rights Office, and other Faculty offices.

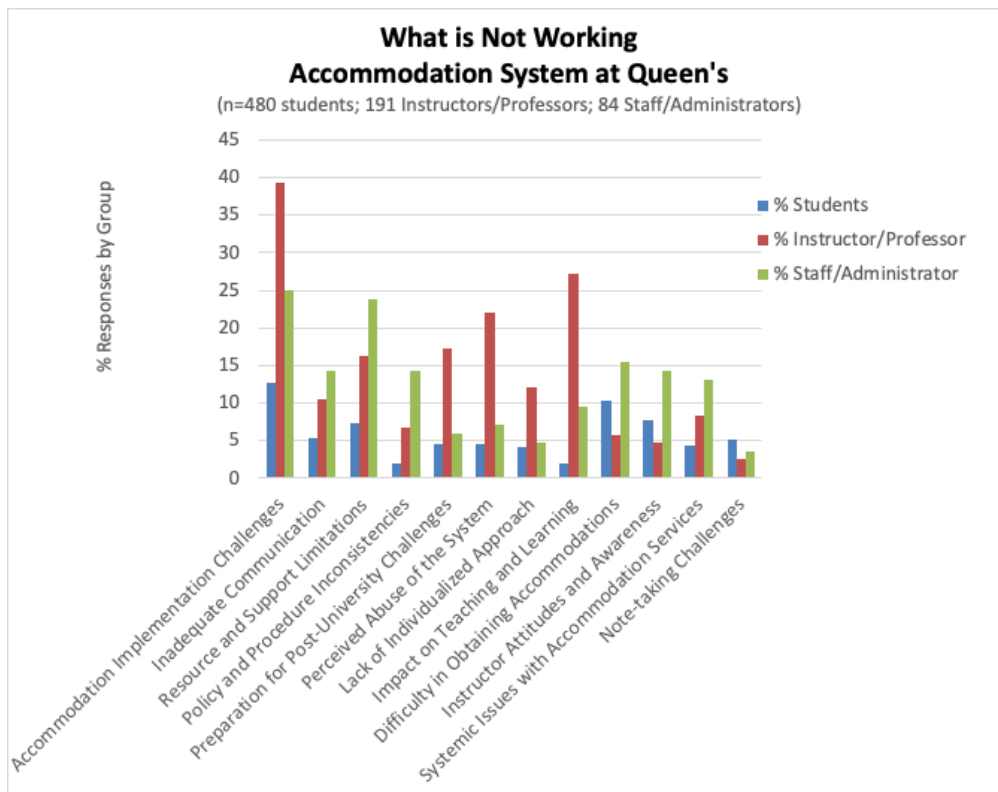| Role of Exams Office	The Exams Office is recognized for efficiently planning and administering tests and exams for students with accommodations, providing continuity, policy consistency, and a uniform experience for students with accommodations.
Policy and Process Improvements	Temporary accommodations are provided in a timely fashion, and there is a positive view of the ongoing improvements to the accommodation system. Policy inclusions such as 'good faith' and the recognition that there are barriers to accessing documentation are appreciated.
Positive Impact of Accommodations	Accommodations are essential for equity and students' ability to complete their degrees. Extensions, private exam rooms, and the use of assistive technology are highlighted as beneficial.

What is Not Working
Accommodation System at Queen's

(n=480 students; 191 Instructors/Professors; 84 Staff/Administrators)

Table 7: What is Not Working at Queen's – Description of Text Responses

Accommodation Implementation Challenges	Many responses indicate that students and faculty face difficulties in the practical implementation of accommodations. Professors sometimes do not honour approved accommodations, and there is confusion about how to apply them effectively in various classroom settings. There are also reports of students receiving accommodations they don't

	need or use, and concerns about the impact of accommodations on course structure and deadlines.
Communication and Understanding Issues	Responses highlight a lack of clear communication and understanding between QSAS (Queen's Student Accessibility Services), faculty, and students. There is confusion about the relationship between considerations and accommodations, and a need for better knowledge sharing and training on supporting diverse accommodation needs. Additionally, there is a perception of a disconnect between Accessibility Services and faculty. There is a lack of proper communication regarding updates to accommodation processes, leading to confusion among instructors and students. Changes are made without informing or consulting the relevant parties, causing disruption and misunderstanding.
Resource and	Several responses point to high caseload numbers for QSAS advisors, long wait

Support Limitations	times for appointments, and insufficient staffing levels. There is a need for more support for instructors and course teams in implementing accommodations, as well as a call for more regular check-ins and proactive support for students with accommodations.
Policy and Procedure Inconsistencies	There is a concern about inconsistencies in policies and procedures across different Faculties and departments. The survey indicates that the accommodation process can be complicated and not always student-centred. There are also mentions of QSAS policy changes without proper notification to faculty and staff.
Preparation for Post-University Challenges	Some responses express concern that the current accommodation system may not adequately prepare students for the workforce. There is a call for more emphasis on helping students develop strategies to manage their disabilities and anxiety, rather than relying solely on accommodations.

Perceived Abuse of the System	There is a sentiment that some students may be exploiting the accommodation system, obtaining accommodations that may not be necessary, which could potentially create an unfair academic environment and diminish the value of accommodations for those with genuine needs.
Lack of Individualized Approach	The accommodation system is seen as too generic and not tailored to individual student needs or specific course requirements. There is a call for more personalized accommodations that consider the unique context of each course and student.
Impact on Teaching and Learning	The current accommodation system is viewed as having a negative impact on the academic experiences of both students and instructors. It is believed to be contributing to increased workloads for faculty, potentially lowering academic standards, and not adequately preparing students for post-university challenges.

Difficulty in Obtaining Accommodations	Students face challenges in getting the proper documentation for accommodations, especially those with limited access to medical services. The process can be lengthy, expensive, and some students with disabilities fall through the cracks due to these barriers.
Instructor Attitudes and Awareness	Some instructors are reported to be unsupportive, lacking understanding, or outright refusing to apply accommodations. This includes negative attitudes towards students using their accommodations and a lack of respect for their needs.
Systemic Issues with Accommodation Services	Students find the system for obtaining accommodations, such as QSAS, to be cumbersome, with long wait times for appointments and urgent issues not being addressed in a timely manner. The system is also seen as inflexible and not tailored to individual student needs.
Preparation for Post-	There is a reported lack of effective note-taking services, with reliance on

University Challenges (Note-taking)	volunteer note-takers leading to inconsistent support. Additionally, students with disabilities express the need for more comprehensive support, including better communication and guidance from the university.

6.3 APPENDIX C: ACADEMIC ACCOMMODATIONS REVIEW CONSULTATION SCHEDULE

Reviewers visited Queen's University College from October 17-19th for formal and informal consultations with the campus community.

Faculty of Education - October 17th 10:00AM – 11:30AM

	Location
Student Consultations	Duncan McArthur Hall (West Campus) A236
Staff Consultations	Duncan McArthur Hall (West Campus) A234
Faculty Consultations	Duncan McArthur Hall (West Campus) A227W

Faculty of Arts and Science - October 18th 12:00PM – 1:30PM

	Location
Student Consultations	Ellis Hall 324

Staff Consultations	Mackintosh-Corry E202 Gathering Space
Faculty Consultations	Mitchell Hall – DDQIC Rose Event Commons

Faculty of Arts and Science - October 19th 12:00PM – 1:30PM

	Location
Student Consultations	Mackintosh Corry B176 Seminar Room
Staff Consultations	ARC North – Alumni Lounge (enter via Q services front desk)
Faculty Consultations	Robert Sutherland Hall 202

Faculty of Engineering and Applied Science: October 18th 2:00PM – 3:30PM

	Location
Student Consultations	Ellis Hall 321

Staff Consultations	ARC North – Alumni Lounge (enter via Q services front desk)
Faculty Consultations	Mitchell Hall – DDQIC Rose Event Commons

Faculty of Health Sciences – October 19th 2:00PM – 3:30PM

	Location
Student Consultations	ARC North – Alumni Lounge (enter via Q services front desk)
Staff Consultations	Mackintosh Corry B176 Seminar Room
Faculty Consultations	Biosciences Complex 2109

Faculty of Law – October 19th 10:00AM - 11:30AM

	Location
Student Consultations	Law Building 400

Staff Consultations	Law Building 300
Faculty Consultations	Law Building 211

Smith School of Business – October 19th 4:00PM – 5:30PM

	Location
Student Consultations	Goodes Hall 305
Staff Consultations	Goodes Hall 302
Faculty Consultations	Goodes Hall 100

Additional evening drop-in sessions:

October 17th 7:00 PM - 8:00 PM Mitchell Hall – DDQIC Rose Event Commons

October 18th 7:00 PM - 8:00 PM Queen's Centre Room 505

October 19th 7:00 PM - 8:00 PM Mitchell Hall – DDQIC Rose Event Commons

6.4 APPENDIX E: REVIEWER BIOS

Patrick Case, MLS, LL.B., LL.M. was most recently Assistant Deputy Minister and Chief Equity Officer in the Education Equity Secretariat of the Ministry of Education. Formerly, Mr. Case was an Assistant Professor in the Department of Political Science at the University of Guelph. He was a long-time adjunct professor at Osgoode Hall Law School, where he directs the certificate program in human rights theory and practice.

From 1979 to 1985, Mr. Case was a trustee with the City of Toronto's Board of Education, where he served as an equity consultant from 1989 to 1999. From 1999 to 2009, he was Director of the Office of Equity and Human Rights at the University of Guelph, and from 2006 to 2010, he was a Commissioner of the Ontario Human Rights Commission. In addition, he has been a trade unionist, school counselor and legal practitioner whose primary focus has been to serve survivors of male violence. Mr. Case was a staff lawyer in the Family Law Division of Parkdale Community Legal Services. He is a past chair of the Canadian Race Relations Foundation, which was created as part of the federal government's redress agreement with Japanese Canadians, and served as co-chair of the Equality Rights Panel of the Court Challenges

Program of Canada. In 2015, he was a member of the Management Advisory Committee of the Toronto District School Board and one of two people appointed by the Minister of Education to review the management and administration of the York Region District School Board.

Nora Farrell, Ph.D., LL.M., M.Ed. is currently a consultant to various higher education institutions and Ombuds Offices as well as an adjunct instructor at Osgoode Hall Law School. Nora has earned a Ph.D. as well as a Masters of Laws from Osgoode Hall Law School at York University and a Master of Education (in adult and higher education) from the University of British Columbia. Previous Ombuds' Roles include:

- Ombudsperson at Algonquin Power & Utilities Corporation/Liberty (renewable energy production) for 3 years.
- Ombudsperson at Toronto Metropolitan University (previously known as Ryerson University) for 18 years.
- Ombudsman for the International Franchise Association and Ombudsperson for the Canadian Franchise Association for 3 years.
- Manager of Investigations and Complaint Resolution for the Ombudsman for Ontario for 5 years.

Tanya Packer, PhD, OTReg (NS) is a licensed occupational therapist and full professor at Dalhousie

University. She is the Assistant Dean, International Partnerships for the Faculty of Health, Director of the School of Health Administration, and a Visiting Professor at Umea University in Sweden. In more than 35 years of academic experience, Tanya has sought new experiences and perspectives by working at universities in Canada, New Zealand, Hong Kong, and Australia. Her academic leadership positions have included Director of the School of Occupational Therapy (Hong Kong and Canada), Director of the Centre for Research into Disability and Society (Australia), Vice-Chair Dalhousie University Senate, and Honorary Professor at Radboud Medical University in the Netherlands. Previously a board member for the Canadian National Institute for the Blind (CNIB), she currently serves on the boards of Vision Loss Rehabilitation Canada and the Canadian International Health Education Association (CIHEA). In addition to her academic leadership roles, Tanya leads an extensive research program that strives to improve the lives of, and health care services received by people living with chronic, long-term conditions. Her work has been funded via tri-council grants, government, and international awards (for example, the US Patient Centred Outcomes Research Institute – PCORI). She has over 100 peer reviewed papers and has received, as PI or CI, over $5M in research funds in the last five years alone.

Jeff Preston, Ph.D. is an associate professor of Disability Studies at King's University College at Western University with a focus on disability, popular culture, and inclusive policy. Jeff is an award-winning teacher at the college and university level whose research has been funded through Ontario Graduate Scholarships, a Joseph-Armand Bombardier CGS Masters Scholarship, and a Social Sciences and Humanities Research Council Doctoral Fellowship. Jeff's first book, "The Fantasy of Disability", was published internationally in 2016 and rereleased in paperback in 2018 by Routledge. A long-time advocate and committed public intellectual, Jeff has served as board chair of Defeat Duchenne Canada, vice-chair of Easter Seals Ontario, member of the Accessibility Standards Advisory Committee for the Ministry of Community and Social Services, vice chair of the Committee of Adjustments at London City Hall and vice chair – leadership table of the London For All anti-poverty initiative organized by the City of London.