



CAEDHH-BC

*Canadian Association of Educators
of the Deaf and Hard of Hearing - British Columbia*

April 12, 2016

Ms. Anne C. Gribbon, P.Eng.
Secretary, CCBFC
National Research Council
Canadian Commission on Building and Fire Codes
Building M-23A
Montreal Road
Ottawa, Canada
K1A 0R6

Dear Ms. Gribbon:

We are the Executive for the British Columbia Affiliate of the Canadian Association of Educators of the Deaf and Hard-of-Hearing (CAEDHH-BC), and represent Teachers of the Deaf and Hard of Hearing (TDHH) throughout the Province of British Columbia. Even with today's most advanced technology, deaf and hard-of-hearing (DHH) students have difficulty understanding spoken language when they are in noisy environments (e.g., in school classrooms). The Human Rights Act states that there is a duty to accommodate students with physical disabilities; therefore it is essential for DHH students to be educated in school buildings that are acoustically well designed, so that noise levels do not have a negative impact on their ability to hear and understand speech clearly.

CAEDHH-BC has previously advocated for national noise standards to be included in the building code for school buildings. The American National Standards Institute (ANSI) ANSI S12.60-2002 has created Acoustical Performance Criteria Design Requirements and Guidelines for Schools that outline building requirements to create classroom environments for optimal speech understanding. Research has shown that tests measuring students' ability to hear and discriminate speech sounds when they are in classroom environments showed a marked difference in students' understanding when classrooms were acoustically more reverberant than when the rooms were acoustically treated (see Crandell & Smaldino, 2000 for literature review). Furthermore, many DHH students experience gaps in expressive and receptive language scores, as evidenced by numerous assessments we conduct annually. It's harder for DHH students with language delays and a limited vocabulary to fill in the blanks for words they can't hear in a highly reverberant room. Translated this means that students have a harder time listening to teachers in rooms that have longer reverberation times as speech becomes muffled and harder to hear, making listening and understanding challenging.

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Unfortunately, many new schools currently being built in British Columbia have high reverberation and noise levels due to these constructions using concrete walls and floors. It is our concern that when noise levels within classrooms increase, it becomes difficult for DHH students to hear the voices of both teachers and peers, impacting their learning and peer interactions. DHH students need to be able to hear intelligible speech in order to fully engage in classrooms interactions and discussions. Further still, it is DHH students' human rights to an accessible education as established in the Canadian Courts; thus, we assert, it is imperative that the Canadian building code for new school buildings include noise standards for classrooms that are similar to ANSI S12.60-2002.

The CAEDHH-BC teachers support the inclusion of noise standards in the National Building Code and Provincial/Territorial Building Codes in order to ensure that DHH students' human rights to accessible language are met.

Sincerely,

The Executive Committee of CAEDHH-BC:

Nancy Norman, and Rhena Tevendale, Co-Presidents,
Kristina Baker, Chiara Berton, Pam Guilbault, Alana Haller, Eric Johnson, Patty Juno,
Jit Khiara, Lynley Lewis, Mary-Ann Livesey, Katelin Miller, Dyan Spear, Bowen Tang,
Angela Wallenuis

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