



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

Mr. James Van Raalte, Director General, Office for Disability Issues, Income Security and Social Development Branch, Employment and Social Development Canada,
james.vanraalte@hrsdc-rhdcc.gc.ca

August 21, 2017

Dear Mr. Van Raalte,

I am writing to you as a representative of the Canadian Association of Teachers of the Deaf and Hard of Hearing (CAEDHH-BC) as a follow up to the presentation that you gave at the Council of Service Providers for the Deaf and Hard of Hearing of British Columbia on May 26, 2017 in Burnaby, B.C. At this meeting, you shared the 'Client Services and the Government of Canada's Accessibility Agenda' powerpoint. In this presentation you outlined the Government's intention to reduce barriers and proactively address them, and to have all levels of government coordinate efforts and harmonize requirements. You shared the feedback from the public consultations and the future goal, 'to ensure and provide equal opportunity and access for all Canadians'. I feel very encouraged that our Government is taking this on and working towards lasting change that will push beyond minimal standards so that all Canadians can benefit from true inclusion.

During the Q and A session following your presentation, I inquired about the status of the proposal to establish acoustical standards in educational buildings and your response was that the question should be posed to the provincial representative. To me, this was a very disappointing response, one that I am hoping was given due to perhaps your own lack of knowledge regarding the history of this initiative.

To provide some background, the School Noise Action Group (SNAG), a CAEDHH-National committee, has been lobbying for legislation or coding of ANSI S12.60-2002(2009) Acoustic Performance Criteria, Design Requirements and Guidelines for Schools, into our Provincial/Territorial Building Codes and National Building Code since 2005. Since this initiative began, Tom Tylka, the key representative of SNAG, has worked diligently to increase awareness of the issues/barriers created by poor acoustical standards in educational settings. Poor acoustics in educational settings not only create a large barrier for deaf and hard of hearing students, but research also shows negative

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impacts on students who have central auditory processing disorder, and learning disabilities. Further to this, poor acoustics contribute to vocal strain that leads to the need for many teachers to seek medical intervention. There is already substantial research to adopt these standards in school construction and renovations. Do you know that many other countries such as Germany, Portugal, Sweden, Italy, the U.K., and the United States already have established acoustical standards? ANSI S12.60 2002(2009) is essential to provide equal accessibility for students with hearing loss and learning challenges.

In 2008, Mr. Tylka and SNAG were informed by Mr. Jeff Vasey, Executive Director of the BC Building Code Office that new building code initiatives such as this require extensive research and monetary commitments too great for Provinces to invest in. Mr. Vasey submitted our proposal to the Executive Committee of the National Building Code office in Ottawa, for their review. At that time Mr. Vasey also suggested that SNAG submit a formal proposal directly to the National Building Code. We subsequently submitted 3 formal proposals, (2008, 2009, and 2016) requesting ANSI standards be accepted by the National Building Code office and so be available to each provincial and territorial building code office across Canada. Unfortunately, many Federal representatives are mis-informed and believe that this specific building code request is a Provincial issue, It is exactly for this reason that I felt so deeply disappointed in your response to my question during the Q&A on May 26.

Mr. Tylka's most recent submission was in response to the suggestion by Mr. Phillip Rizcalah, Manager at the National Building Code office in 2009, to wait 5 years before submitting a proposal again. Mr. Tylka completed the 3rd on-line Code Change Request on March 15, 2016. At that time, he was informed to await an invitation to attend the adjudication by the Executive Committee of the National Research Council. Tom is still waiting for this invitation to Ottawa to speak to this proposal. In the meantime, students with hearing loss who are challenged by acoustical barriers in classrooms across Canada every day, experience systemic discrimination and marginalization.

Many professionals including University Professors in Occupational Hygiene, Acoustical Engineering, Audiology and Speech Pathology, and Special Education, as well as Parents and Deaf and Hard of Hearing Individuals, and Educators of the Deaf and Hard

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of Hearing, support this proposal, and have volunteered their time and expertise to lobby government at both the Provincial and Federal levels. Unfortunately, due to the lengthy delay since the initial proposal in 2009, and no action on this important initiative at either the Federal or Provincial levels, it appears likely that a formal complaint may be submitted to the Canadian Human Rights Commission in Ottawa.

We urge you to please stand by your stated intention to have all levels of government work together to reduce barriers and establish harmonized requirements across Canada. Attached is a scanned copy of the 2016 proposal that was submitted by Mr. Tylka on behalf of the Canadian Association of Educators of the Deaf and Hard of Hearing. Should you like further information regarding the supporting research or background please contact either Rhena Tevendale, 604-990-1165 or rhenatevendale@gmail.com or Mr. Tom Tylka at 604-988-9227 or terrytylka@yahoo.ca,

Sincerely,

Rhena Tevendale, Certified Teacher of the Deaf and Hard of Hearing, CAEDHH-BC
Representative

Tom Tylka, MEd., Certified Teacher of the Deaf and Hard of Hearing

Cc. Honourable Navdeep Bains, Federal Minister of Innovation, Science and Economic
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