



Making School Buildings and Sites More Accessible

To: Planning and Priorities Committee

Date: 3 November, 2021

Report No.: 11-21-4173

Strategic Directions

- Provide Equity of Access to Learning Opportunities for All Students
- Allocate Human and Financial Resources Strategically to Support Student Needs

Recommendation

It is recommended that:

1. The Chair of the Board write to the Minister of Education to advocate for dedicated funding to make existing schools accessible.
2. The Director:
 - a. Seek permission from the Ministry of Education to use Proceeds of Disposition (PoD) for accessibility improvements to buildings and sites;
 - b. Instruct an interdepartmental team to develop a plan for making improvements to existing designated schools and to increase the network of designated schools across the district; and
 - c. Include a request for PoD to fund the implementation of the plan in the Capital Budget presented to the Board in June 2022, subject to Ministry approval.

Context

To meet our commitment to human rights, equity, and inclusion, and to honour the Canadian Human Rights Act, the TDSB is obligated to improve accessibility for people with disabilities. While acknowledging that accessibility has many definitions and dimensions, this report focuses on the built environment, which includes the interior and exterior features of schools.

While all new TDSB schools are designed to meet or exceed current accessibility standards, most of our older schools were not built with accessibility in mind. These sites include significant barriers to students, educators, parents, and visitors with disabilities, including those who use mobility assistance devices and who have low vision or hearing.

How Accessible are TDSB Schools?

In 2014 and 2015, the TDSB audited all of its schools and created site-specific profiles. Each school profile includes a description of interior and exterior accessibility features and a map. For an example and more information, see *Appendix A: Site-Specific Accessibility Profiles*.

The on-site accessibility audits of school buildings have also allowed staff to group schools into three categories: accessible, somewhat accessible, and not accessible.

3. **Accessible** means the building meets objective design parameters specific to the TDSB. A building meeting this level would allow independent access into and throughout the building and provide a barrier-free washroom.
4. A **Somewhat Accessible** building is one that doesn't meet the full criteria of Accessible but provides independent access into the building, a barrier-free washroom on the level of entry, and a level of entry with no level disruptions.
5. Those buildings not meeting either Accessible or Somewhat Accessible defaulted to the **Not Accessible** category.

As shown in appendices B, C and D, 160 buildings have been categorized as accessible, 78 as somewhat accessible and 332 as not accessible.

Funding and Accessibility

There are two challenges associated with funding and accessibility:

- the amount of funding needed, and
- kind of funding the TDSB receives.

The first challenge is the magnitude of funds needed given the complexity of work often required. Based on the information collected during the on-site audits, staff estimate that \$1 billion will be needed to make all schools accessible.

The cost to make Maplewood High School fully accessible, for example, was \$5 million and took two years of construction. The cost to provide accessibility to most, but not all, spaces at The Elms Junior Middle School was \$1.3 million and took one and a half years to complete. For more information on these projects, see *Appendix E: Case Studies*.

The second challenge is the nature of the funding that the TDSB receives from the Ministry of Education. Accessibility is improved in the following circumstances:

1. All new schools and additions must meet the accessibility requirements of the Ontario Building Code (OBC) and the Accessibility for Ontarians with Disabilities Act (AODA). The Ministry provides the funding to meet these requirements, and as a result, all new TDSB schools and additions are accessible. For more information on the OBC and AODA, see *Appendix F: Legislation and Regulations*.

2. When school buildings and sites are renovated as part of Renewal or State of Good Repair projects. These projects are primarily funded from School Condition Index (SCI) funding, which is to be used to repair and replace building and site components that are recorded as part of the TDSB's \$3.7 billion Repair Backlog. For example, when a parking lot is being replaced, accessible parking spaces are included, as well as an accessible path of travel from the parking lot to the doors of the school.

While accessibility improvements are regularly made, projects are selected based on the priorities identified in the Repair Backlog, not by considerations related to systematic inequities in accessibility.

A related constraint is that SCI funding cannot be used to improve accessibility if the space is not listed in the Repair Backlog. For example, there are frequent requests for ramps and elevators, but if they don't exist, then SCI funding cannot be used to install them.

While provincial funding for new schools and additions allows the TDSB to meet the requirements of the OBC and AODA, and SCI funding can help make important accessibility improvements on an ad-hoc basis as part of State of Good Repair projects, there is no dedicated funding from the Ministry for school boards to plan and execute a program of accessibility upgrades to buildings and sites.

The only feasible option to improve accessibility in existing buildings methodically would be for the TDSB to request permission from the Ministry of Education to use Proceeds of Disposition (PoD). In doing so, staff will be able to design and implement planned accessibility projects based on identified priorities.

But even if permission to use PoD is granted, difficult choices about priorities will have to be made because of the high cost of making even one school accessible, let alone the \$1 billion required to meet all needs.

Accessibility and Replacement Schools

Adding to the complexity is that some schools simply cannot be made accessible because the renovations required would be extreme in both extent and cost. Often these are the same buildings that have repair backlogs that exceed their replacement value.

Replacing these schools may be the best option, since it would eliminate the repair backlog and result in buildings that meet today's accessibility standards. This is particularly important for secondary schools because of the way that students need to move through the building to have equitable access to available programs.

Improving the Accessibility of Existing Schools

Designated Schools

The TDSB has had a network of designated schools (as shown in Appendix G) for about twenty years. “Designated schools” is a term used to describe schools that have been designated for students with accessibility needs.

In most cases, the designated schools are classified as Accessible, but because some areas do not have accessible facilities, some building are not fully accessible.

Over the years, investments have been made into designated schools to meet the needs of the students enrolled, which often include features needed by students but not required by the OBC or AODA. For example, students may need special desks, or modifications to washrooms that, while barrier-free for adults as required by the OBC, do not meet the needs of children.

Since PoD for accessibility will be limited, available funding should be directed strategically into improving existing designated schools and to gradually increase the number of sites with this designation so that there are more pathways for students as they move through the school system.

To this end, an interdepartmental team with representation from the Learning Networks, Special Education, and Planning and Facility Services will be brought together to help plan and guide a program of improvements to strengthen the network of designated schools across the district.

Action Plan and Associated Timeline

An interdepartmental team will develop a plan to improve the accessibility and present a budget request for PoD to support the plan in the June 2022 Capital Budget report

Upon approval of the funding, detailed design development will commence, to be followed by the tendering of projects and construction in the 2022/23 school year.

Resource Implications

Existing staff resources will be used to develop the plan.

Communications Considerations

N/A

Board Policy and Procedure Reference(s)

Policy P069 – Accessibility

Appendices

- Appendix A: Site Specific Accessibility Profiles
- Appendix B: Accessible Schools
- Appendix C: Somewhat Accessible Schools
- Appendix D: Not Accessible Schools
- Appendix E: Case Studies
- Appendix F: Legislation and Regulations
- Appendix G: Designated Schools

From

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