

Policy Brief

An Autism Lens on the Disability Inclusion Action Plan (DIAP)

How specific needs and circumstances of Autistic persons and other neurodevelopmental disabilities can be considered in the development and implementation of the DIAP

Contributors

This Policy Brief was prepared by the Canadian Autism Spectrum Disorder Alliance (CASDA) and the Kids Brain Health Network (KBHN) and its members.

Information provided in this Policy Brief is drawn from the following sources:

- 2021 KBHN-CASDA Policy Development Practicum results
- CASDA's 2020 [Policy Compendium](#) developed with KBHN and a wide range of stakeholders
- [Policy Brief – 'Why is Uptake of the Disability Tax Credit Low in Canada? Exploring possible Barriers to Access'](#) from 2018
- 2021 University of Calgary (UofC) study on *'Who benefits from government disability financial support? An assessment of how disability benefits support caregivers of children with severe disabilities in Canada at different incomes'*
- 2018 [Op-ed](#) on *'how Canada is harming its most vulnerable citizens'*
- 2021 research project on *'Nothing without us: Towards inclusive, equitable COVID-19 policy responses for youth with disabilities and their families'* a cooperation between the UofC, McGill University, CASDA and CanChild.

Background and Context

The federal government has taken positive steps with plans to make Canadian society barrier-free for all individuals through various legislative and policy efforts, including the DIAP. While extensive consultations have taken place, **this Policy Brief provides autism-specific recommendations for the development and implementation of the DIAP and proposes its alignment with the National Autism Strategy (NAS)**. Even though the brief provides an autism lens, most recommendations apply to persons with neurodevelopmental disabilities (NDDs) as well.

Summary of Recommendations

Pillar 1: Financial security

Reform the Disability Tax Credit

1. Ensure inclusivity in relation to the new Disability Benefit
2. Improve income support related to housing

Pillar 2: Employment

1. Introduce pre-employment programs
2. Create inclusive workplaces
3. Extend federal accessibility legislation to private sector organizations across Canada

Pillar 3: Disability-inclusive spaces

1. Improve autistic people's access and use of physical spaces
2. Improve the ease of use of language in public spaces both physical and online
3. Promote understanding and acceptance of autism and neurodivergence within Canadian

Pillar 4: A modern approach to disability

1. Create equity of funding and resource allocation across the lifespan and across the country by providing to all with a service need
2. Review and modify the provision of mental health services for persons with NDDs
3. Develop standards of care and a national database to help identify gaps and assess outcomes relative to these standard of care benchmarks

Crosscutting Recommendations

1. Improve governance and coordination in the disability sector
2. Ensure sufficient outreach to underserved communities

Recommendations for Pillar 1: Financial security

In trying to address the immediate and long-term financial needs of Canadians with disabilities, the DIAP should consider Autistic persons by:

1. Reforming The Disability Tax Credit

DTC reform offers the federal government an opportunity to demonstrate timely action towards the DIAP and National Autism Strategy (NAS) by:

- Replacing Form T2201 with new application form(s) that better reflect the challenges faced by children and adults with neurodevelopmental conditions.
- Expanding the number of medical practitioners able to fill out all sections of the renewed DTC application form.
- Recognizing Autism and other neurodevelopmental disabilities as a lifelong condition to reduce the burden of costly reassessments and ensure Autistic adults do not lose access to their benefits.
- Make the DTC refundable to ensure it meets the needs of low-income Autistic and other neurodivergent Canadians.
- Continue efforts to remove DTC eligibility as a prerequisite to receiving other disability benefits such as the Child Disability Benefit and Registered Disability Savings Plans (RDSPs).
- Provide sufficient information and support on the DTC application process.

2. Ensuring inclusivity in relation to the new Disability Benefit

Government should use lessons learnt from the Disability Tax Credit assessment process, which has much higher rejection rates for people with disabilities related to intellectual or cognitive function, as opposed to physical disabilities. Due to flaws in the eligibility process, only 40 percent of disabled Canadians are able to access certain programs and benefits that are available to those receiving the Disability Tax Credit. The new Disability Benefit should:

- Use a definition of disability that will lead to a more inclusive process in determining if people are eligible for disability programs and services.
- Introduce a service needs-based eligibility assessment.
- Address and prevent variations in uptake across provinces and income levels.
- Align with and complement the reformed DTC system.
- Prevent barriers to access by designing a clear and simple application process while providing sufficient information and assistance for applicants (recognizing current differences in diagnoses related to gender and race and cognitive function).

3. Improve income support related to housing

- Convene a Federal/Provincial/Territorial working group to design a disability supplement to the Canada Housing Benefit.
- Work with provinces and municipalities on providing supports for those with developmental disabilities to afford housing in markets with increasing rents and implement the recommendations from the Solutions Lab “Designing a Registered Disability Savings Plan Homeownership Plan”, allowing RDSP beneficiaries to withdraw funds to be used towards a down payment for a home.
- Address Housing Supply Challenges: direct Canada Mortgage and Housing Corporation to expand the current indicators used for inclusive housing to include persons with developmental disabilities allowing for full inclusion.
- Build connections between affordable housing developers and service agencies to integrate principles of inclusive design.

Recommendations for Pillar 2: Employment

In the effort to reduce long-standing barriers that persons with autism face in the labour market and in the workplace, the DIAP and Employment Strategy should consider the following autism specific recommendations:

1. Introduce Pre-Employment Programs

- Expand and enhance current pre-employment programs (International examples of successful, evidence-based, tailored pre-employment programs include ‘Steps to Success’ program in Northern Ireland and the National Autistic Society Scotland Prospects program).
- Encourage provinces/territories to implement programs within high-schools and post-secondary institutions to improve opportunities of finding employment and preparing individuals for employment (examples include CommunityWorks Canada (after school) and SchoolWorks Canada (in-school), delivered by members of the Worktopia network or Project SEARCH as a transition-to-work program offered to high school students).
- Establish sustainable autism and NDD specific funding platforms and carry out continuous evaluation of these funded programs to ensure effectiveness and merit for sustainability efforts.

2. Create Inclusive Workplaces

- Increase and develop employer training initiatives and opportunities for hiring and supporting autistic or other neurodivergent employees.
- Commit to a workplace adjustment/accommodation fund to support employers who hire autistic or other neurodivergent individuals.
- Select, disseminate, and help implement best practices from federally funded programs that demonstrate effective recruiting, selecting, hiring, onboarding, and retention models used by Canadian employers.
- Shift from a ‘one-size-fits-all’ model to competency-based hiring.
- Increase access to and implementation of on-the-job supports for autistic and other neurodivergent employees.
- Allow for and provide alternative methods of funding to support individuals on the autism spectrum in the workplace.

3. Extend federal accessibility legislation to private sector organizations across Canada

The Accessible Canada Act allows for the proactive identification, removal and prevention of barriers to accessibility wherever Canadians interact with areas under federal jurisdiction. It is recommended to:

- Extend **accessibility legislation to cover all organizations that conduct business in Canada** to provide consistency across the country. The application could be similar to how the Personal Information Protection and Electronic Documents Act is applied so that provinces with their own substantively similar, accessibility legislation would be generally exempt.

Recommendations for Pillar 3: Disability-inclusive spaces

To address barriers in public spaces, including community and social infrastructure and programming that are currently preventing Canadians with disabilities from fully participating in their communities and the economy, the DIAP should consider Autistic persons by:

1. Improving Autistic and neurodivergent people’s access and use of physical spaces

- Ensure that federal buildings, transport, stations/airports and roads are designed, built and operated so that they are easy to use for all. This would include specific sensory and safety adaptations suited for people with a range of access needs.

- Build connections between building, housing and community developers and service agencies, to integrate principles of inclusive design into new structures and developments.
- Develop guidelines for planners and developers involved in the planning phases of building and/or incorporating modifications to existing infrastructure to support autistic and neurodivergent people, and encourage planners to consult with autistic and other neurodivergent people in the process.
- Develop and implement an inclusive transport strategy modelled after England’s autism strategy (2021). This includes a disability equality training for transport operators to ensure a more inclusive and supportive public transport environment.

2. Improving the ease of use of language in public spaces both physical and online

As part of the initiatives of the Accessible Canada Act, federal departments, such as housing and transport, should work together to:

- Improve both physical and online information - ensuring that federal building and transport facilities provide information in physical and online formats that all people can easily access and understand, before and during a building visit or journey.
- Broaden the awareness and understanding of people with both visible and less visible difficulties through staff training across federal departments to understand the needs of people with physical, mental, cognitive or sensory impairments, so that they can provide better assistance.
- Introduce similar language standards and messaging to be incorporated into training about autism for frontline (public-facing) federal service professionals, especially those who may come in contact with Autistic people (e.g., RCMP)
- Federal funding opportunities can be created for agencies/organizations to hold awareness, acceptance and action campaigns and trainings around disability (such as e.g. Holland Bloorview Kids Rehabilitation Campaign or Dear Everybody)
- Prioritize the development and implementation of standards for incorporating respectful strengths-based language related to autistic and other neurodivergent people into communications—for adoption by all federal departments, and by stakeholders Accessible Standards Canada engages to promote accessibility.

3. Promoting understanding and acceptance of autism within Canadian society through increasing awareness about neurodiversity across sectors via educational programs, trainings and campaigns, such as:

- Education programs e.g., Leans program for learning about neurodiversity at school, Dear Everybody campaign for talking about ableism at Holland Bloorview Rehabilitation Centre, 7-day Neurodiversity Inclusion Challenge at Brandeis University, Information for professors about autism at Algonquin college, videos for professionals to consult to support autistic students.
- Training on understanding of autism and other NDDs to extend to wider community (across any public facing government departments, medical professionals, police etc.).
- Increasing awareness about co-occurrence of mental health challenges and coping strategies that are known to facilitate support and well-being (e.g., assistance/therapy animals - more affordable than service animals)
- Implementing a public-facing media campaign led by the Public Health Agency of Canada to i) promote a balanced understanding of autism as a neurodevelopmental condition that comes with strengths as well as challenges that can be disabling, and ii) introduce and model acceptable language for referring to and describing autistic and other neurodivergent individuals.
- Introduce a group similar to England’s All Party Parliamentary Group on Autism (APPGA), which is a formal cross-party backbench group of Members of the House of Commons (MPs) and Members of the House of Lords who campaign in Parliament for greater awareness of autism, and improved services for autistic people and their families. The APPGA also offers autism training for MPs and their staff to improve understanding of autism in Parliament and to share with their constituents.
- Revise language standards by Accessibility Standards Canada (ASC) to:
 - Broaden the understanding of accessibility to include language and attitudes about disability,

- Prioritize the development and implementation of standards for incorporating respectful strengths-based language related to autism into communications—for adoption by all federal departments, and by stakeholders ASC engages to promote accessibility,
- Employ one or more Autistic experts to compile existing resources for developing such language standards. ASC may see adoption of these recommendations as helpful to mitigate the risk of "lack of credibility," which it identified as something it "needs to quickly establish" in its 2020 to 2021 Departmental Plan

Recommendations for Pillar 4: A modern approach to disability

In the effort to use a modern definition of disability that will lead to a better and simpler process in determining if people are eligible for Government of Canada disability programs and services, DIAP should:

1. Create equity of funding and resource allocation across the lifespan and across the country by providing to all with a service need

- Ensure access to services for autistic or neurodivergent people that is needs-based rather than based on diagnosis or age.
- Ensure early diagnosis and access to services by adopting an enhanced 18-Month Well-Baby Visit. If children demonstrate developmental health challenges at 18 months, regardless of a diagnosis, a referral from the physician who completes this visit should qualify children to access early developmental intervention services.
- Recognize and address the compounding challenges that underserved communities experience accessing diagnostic as well as other supports and services.
- Recognize diagnoses made following national standards of care across provinces and territories, regardless of where the diagnosis was originally made.
- Prevent barriers of access to services based on diagnosis related to severity/visibility, gender (lower diagnosis levels of women and girls), gender identity and race by promoting diversity in practice and ensure sufficient awareness and training levels of medical practitioners.

2. Encourage provinces/territories to review and modify the provision of mental health services for persons with NDDs

- Work with national professional organizations (e.g., the Canadian Psychological Association) to review the licencing requirements of clinical professionals across provinces and territories. Allowing for cross-provincial/territorial practice may help eliminate barriers to accessing trained mental health professionals.
- Adapt mental health services to specific needs of autistic and neurodiverse individuals (e.g. offer home service, video conferencing)
- Increase the number of mental health professionals who can treat mental health issues in autistic and other neurodivergent individuals
- Provide funds to incentivize professional governing bodies to offer continuing education opportunities for currently practicing professionals.
- Provide better access to evidence-based journals (e.g. open access) to develop capacity of professionals to work with Autistic individuals.
- Develop national standards of service delivery that prevent service providers from disqualifying an individual based on their autism diagnosis.

3. Develop standards of care and a national database to help identify gaps and assess outcomes relative to these standards of care benchmarks

Without nation-wide standards of care, the level of care available to autistic individuals greatly varies by region and leaves certain populations in less-supported, more vulnerable positions. Additionally, there is no national effort to track metrics around services offered, populations served, outcomes of offered services, etc. making it difficult to define where need lies within our current system.

- The federal government should be responsible for creating a national database and mandate provinces and territories to submit relevant information. This database should include service metrics such as services available, time to diagnosis or service access, age of diagnosis, funding, outcomes (short- and long-term), etc. as well as demographic information of the populations accessing such services, such as language spoken, the number of autistic individuals by province, etc.
- The federal government should create accessible, informational resources outlining evidence-informed supports and provide guidance to provinces and territories in supplementing these. Information held in the database should be made available to the public, similar to Alberta’s 211 helpline or AIDE Canada’s resource compilation.
- Autistic adults as well as family members report a lack of clarity around what resources are available and how to access them. Creation of informational resources and provision of system navigation can assist in understanding of and utilization of available resources.

Crosscutting Recommendations

1. Improve Governance and Coordination in the Disability Sector

- **Improve coordination across Ministries through the Office of Disability Issues** to increase responsibility and accountability for the broad portfolio of disability policy.
- **Ensure alignment of DIAP with the National Autism Strategy.** Particular attention should go towards:
 - Ensuring exchange of information during phases of consultation and drafting
 - Ensuring complementarity in relation to the policies and investments during it’s implementation
 - Ensuring data collection and monitoring of key indicators are aligned
- **Establish an FPT implementation-partnership framework** to address program sustainability. We recommend the development of a Federal-Provincial-Territorial (FPT) implementation-partnership framework to focus on effective, sustainable, and scalable programs and services that directly impact Autistic Canadians and their families across the lifespan.
- **Build federal-provincial-territorial partnerships to streamline accessibility standards**
 - **Convene a Federal-Provincial-Territorial First Ministers’ conference** in accessibility every few years to evaluate barriers experienced by disabled Canadians and to share knowledge about practices that different regions across the country have effectively implemented for increasing social inclusion. Ensure that autistic and other neurodivergent voices and experiences are meaningfully represented. All Ministers involved in making decisions that influence the social participation of autistic and other neurodivergent Canadians, such as the Minister of Employment, Workforce development and Disability Inclusion, as well as Ministers and senior bureaucrats of Health, Education, Children and Families, Housing are encouraged to be present at these meetings to facilitate cohesion across knowledge and practice across the country.
 - At the First Minister’s conferences, priority should be placed on **establishing timelines and deadlines for private and public sectors to access funding** that ensures equal opportunities for implementing effective practices for social inclusion across the country. Despite available opportunities for private and public agencies to apply for funding opportunities, cross government coordination is needed to ensure reasonable timelines and deadlines. An integrated calendar with relevant information about cross government funding opportunities would be helpful for ensuring agencies are given sufficient time to complete applications. An example of an integrated calendar could be found on the federal government website related to funding opportunities for researchers, postdoctoral fellows, graduate students and research institutions.
- **Create and fund interdisciplinary Centres for Excellence in Autism Research and Care.** We recommend the creation of additional Centres for Excellence in Autism research and care where regional gaps exist, and bridging to existing Centres, to strengthen current and prospective research, increasing capacity to inform policy through facilitation of provincial, territorial and regional collaboration. These Centres will inform, recommend and evaluate policy on lifespan aspects related specifically to Autistic Canadians and related conditions.

2. Ensure sufficient outreach to Underserved Communities by:

- **Establishing rural/remote educational policy initiatives to attract health care and paraprofessional providers to these areas.**
 - Initiatives may include recruiting students from rural/remote areas by offering scholarships, bursaries or forgiving student loans in exchange for providing services in these areas.
 - Creating partnerships with Indigenous communities to offer educational training opportunities and build capacity to improve access to culturally safe evidence-informed services.
 - With the increase in remote consultations and telehealth options, it is crucial to address limited access to fast, high-speed internet and technology equipment particularly in remote/rural areas.
- **Creating federal grants and partnerships to support cultural community organizations that serve immigrant, racialized, and ethno-cultural individuals and their families.**
 - Targeted supports should be provided for ESL individuals and their families. This should include access to service navigators, translators, and interpreters without cost. Informational resources should be accessible to families in their own language.
 - Capacity building initiatives should involve cultural outreach activities and co-creating culturally appropriate services and supports with Indigenous leaders and organizations.
 - Implementation of evidence-informed services should focus on holistic health and consider family well-being.

ABOUT CASDA

CASDA is a collective of over 300 sector leaders, including Autistic people, caregivers, clinicians, researchers, and representatives from organizations across Canada that have proactively mobilized as one voice to successfully advocate for a National Autism Strategy (NAS). We have a track record of delivering national initiatives and a demonstrated history of collaboration with the federal government. We lead by convening the community as we build a community-driven evidence to policy pipeline for autism and related conditions. www.casda.ca