



**Written Submission for the Pre-Budget
Consultations in Advance of
the 2022 Federal Budget**

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List of Recommendations

Recommendation 1: CNIB recommends the federal government enhance multi-year funding for employment programs supporting Canadians with disabilities, in the wake of an imminent post-pandemic employment crisis. Government funding must prioritize funding existing, successful employment programs and ensure flexible eligibility and reporting.

Recommendation 2: CNIB recommends that the Government of Canada regulate the production and distribution of accessible books, requiring publishers to make a percentage of all books produced in alternate formats for Canadians with print disabilities. This regulatory requirement can follow the format of existing Canadian Content requirements for broadcasters.

Recommendation 3: CNIB recommends that the Government of Canada modernize ISED's Connecting Families initiative to include eligibility for Canadians with sight loss for this program, regardless of their qualification to receive the Canada Child Benefit. Further, CNIB recommends that the Government of Canada include mobile data in the updated Connecting Families program, so Canadians with sight loss have access to life-changing wayfinding and virtual assistance applications outside the home.

Recommendation 4: CNIB recommends that the Government of Canada consult with CNIB to set up a pool of individuals who can test digital services, platforms, and apps to ensure their usability and accessibility. This pool of testers must be compensated for their time and expertise, in a similar way to external contractors hired by the federal government.

About CNIB

Celebrating 100 years in 2018, CNIB is a non-profit organization driven to change what it is to be blind today. We deliver innovative programs and powerful advocacy that empowers people impacted by blindness to live their dreams and tear down barriers to inclusion. Our work is powered by a network of volunteers, donors and partners from coast to coast to coast.

Access to Employment for Canadians with Disabilities

A year ago, we couldn't have predicted how the employment landscape would shift. The demand for our career and employment programs has increased significantly as the pandemic has highlighted existing inequalities – vulnerable groups and those living on low-incomes have experienced the most job losses, reduction in hours worked, and restricted access to community services and supports¹. CNIB has dramatically increased our own employment supports as our talent pool of jobseekers increased 300 percent in 2020-21.

Only 31 percent of working-age adults with sight loss are employed full time, compared to the national employment rate of 65.5 percent². We know the un-and-under employment of Canadians with sight loss is an even greater concern in the aftermath of the COVID-19 pandemic, as the pandemic has significantly increased barriers to employment in a world defined by physical and social distancing. According to CNIB's Levels of Employment Study 2021, 31 percent of working Canadians with sight loss had a change in employment status due to COVID-19. Simply, Canadians with sight loss are facing an employment crisis and CNIB is calling on the federal government to enhance employment supports for Canadians with disabilities as the economy re-opens.

Future support programs run by the federal government that aim to improve employment rates among Canadians with disabilities must not cause a clawback on any provincially run support programs. Many Canadians with disabilities rely on part time income to supplement their existing provincial disability support programs, and any employment strategies from the federal government need to support and encourage Canadians with disabilities to enter the workforce, rather than disincentivize.

CNIB has continuously heard that access and affordability of assistive devices are a barrier to finding employment opportunities. To help Canadians with disabilities access the devices they need to be successful in the workplace, the Government of Canada must establish a national assistive devices program. Such a program needs to be inclusive of entrepreneurs, gig workers, and students with disabilities and not be tied to an employer.

¹ *Economic and Fiscal Snapshot 2020*. Department of Finance Canada, July 8, 2020

² CNIB Levels of Employment Study 2021.

CNIB recommends the Government of Canada enhance multi-year funding for employment programs supporting Canadians with disabilities, in the wake of an imminent post-pandemic employment crisis. Government funding must prioritize funding existing, successful employment programs and ensure flexible eligibility and reporting.

Access to Literature – A Precursor to Low Employment Levels

Canadians with sight loss and other print disabilities are being denied the right to read. Access to information is crucial to education, employment, and even opportunities to connect socially with the community. Yet less than 10 percent of books are available in accessible formats for those with print disabilities³, meaning Canadians with sight loss do not have access to the written information necessary to successfully complete their education and compete in the labour market with their sighted peers.

CNIB estimates that there is more accessible television programming with described video than there are accessible books in Canada! Whether it's escaping into a favourite book, or learning a new skill for school or work, access to literature and information in accessible formats is critical to people who are blind, partially sighted, or have another print disability.

Lack of access to books in accessible formats significantly impacts someone's ability to successfully complete their education and compete in the labour market with their sighted peers. Not having equitable access to literature is a precursor for the low employment levels for Canadians who are blind or partially sighted.

CNIB strongly believes that the federal government has a role to play in production and distribution of accessible literature. In 2016, the Government of Canada ratified and acceded to the Marrakesh Treaty, an international treaty with the goal to end the international "book famine" for people with print disabilities, through expanding the number of published works available in alternative formats around the world. With this commitment, the Government of Canada must be a collaborative partner to create a long-term solution to enhance access to accessible literature.

CNIB recommends that the Government of Canada regulate the production and distribution of accessible books, requiring publishers to make a percentage of all books produced in alternate formats for Canadians with print disabilities. This regulatory requirement can follow the format of existing Canadian Content requirements for broadcasters.

³ "Accessible Publishing Summit: Advocating for Born Accessible Books." *National Network for Equitable Library Service (NNELS)*, 11 Oct. 2019.

Unleashing the Power of Technology

Many people don't realize the tremendous impact modern smartphones have in the lives of individuals who are blind or partially sighted. Today, accessible smartphone apps make it possible for people with sight loss to do all kinds of things that may have seemed challenging before: reading prescription labels, accessing websites using Voiceover, or independent wayfinding using a smartphone to connect with beacon technology or live agents through video chat.

In 2017, through public meetings and telephone interviews, CNIB spoke to more than 4,000 Canadians impacted by blindness. Ninety-seven percent of respondents with sight loss said access to technology is integral to leading an independent life. Despite how life-changing these devices can be, the high cost of smartphones, mobile data plans, and broadband internet mean that not everyone has access.

According to Statistics Canada, in 2019, households across all income quintiles spent approximately \$112 per month on cell phone and pager services or 1.8 percent of total monthly expenditures after tax⁴. The price of mobile and broadband services is often too expensive for a population that has an average full-time employment rate of only 31 percent.

An Unmet Need for Canadians with Sight Loss

In 2018, Statistics Canada reported that 80.3 percent of Canadians owned a smart phone⁵; however, according to CNIB's research, as of 2018, 46 percent of Canadians with sight loss did not own a smart phone device.

Improving digital access so everyone can fully participate in Canadian society and the economy means ensuring that high-speed mobile and broadband internet is accessible, available, and affordable to people with disabilities.

Pursuant to the CRTC's 2016 decision, "Modern telecommunication services – the path forward for Canada's digital economy⁶", telecommunication service providers (TSP) are required to:

- Make available wireless service packages that meet the needs of persons with disabilities; and

⁴ Government of Canada, Statistics Canada. "Household spending by household income quintile, Canada, regions and province." [Table: 11-10-0223-01](#)

⁵ Government of Canada, Statistics Canada. "Canadian Internet Use Survey."

⁶ Government of Canada, Canadian Radio-Television and Telecommunications Commission (CRTC). "Telecom Regulatory Policy CRTC 2016-496." *CRTC*, 21 Dec. 2016.

- Clearly communicate these plans, including products readily available on their websites.

As witnessed by many of the CRTC submissions from various regulated entities, not all internet carriers are abiding by the Commission's 2016 ruling to provide wireless mobile plans for Canadians with disabilities, specifically to include additional data to facilitate independent way finding through accessible apps and virtual assistance. **Simply, the affordability of telecommunication service for Canadians with sight loss are not being met.**

If wireless mobile plans are not complying with CRTC rulings, then the Government of Canada must create an affordable solution to accessing high speed mobile and broadband Internet for Canadians with disabilities. One such mechanism would be through the **Connecting Families initiative**, offered by ISED. The current plan offers families access to high-speed Internet service packages for \$10 per month from participating Internet Service Providers (ISPs). However, to be eligible to the Connecting Families initiative, you must be in receipt of the maximum Canada Childcare Benefit.

CNIB recommends that the Government of Canada modernize ISED's Connecting Families initiative to include eligibility for Canadians with sight loss for this program, regardless of their qualification to receive the Canada Child Benefit.

CNIB also recommends that the Government of Canada include mobile data in this program, so Canadians with sight loss have access to life-changing wayfinding and virtual assistance applications outside the home.


Using Lived Experience to Remove Barriers to Digital Inclusion

Far too often digital platforms, services and applications are created without the feedback and user testing of people with sight loss, resulting in an inaccessible and unusable experience for people with sight loss. This must change.

CNIB is a committed partner of the federal government and can utilize our professional services and pool of Canadians with sight loss to test new and upgraded digital services for accessibility and usability.

CNIB recommends that the Government of Canada utilize CNIB to set up a pool of individuals who can test digital services, platforms, and apps to ensure their usability and accessibility. This pool of testers must be compensated for their time and expertise, in a similar way to external contractors hired by the federal government.

Conclusion



Technology can level the playing field for Canadians who are blind or partially sighted, but only when it's accessible, available, and affordable. With the right technology, people with sight loss can safely and independently navigate their communities, gain meaningful employment, and participate in the local economy. However, the high cost of these devices mean they are unaffordable to people with sight loss – a population with a full-time employment rate of only 31 percent.

Having access to mobile phones, data plans, and broadband internet will empower Canadians with sight loss to navigate their communities safely and independently, access information, and gain meaningful employment.

We know Canadians who are blind or partially sighted want to work. Assistive devices and technology empower individuals with sight loss who are seeking employment by providing the skills and equipment they need to succeed. Technology enables people with sight loss to work like their sighted peers, just with small adaptations such as screen reading or screen magnification software, or a smartphone to navigate around the office independently.

With the right technology in their hands, Canadians with sight loss have the skills and tools they need to be competitive in the labour market. A job is so much more than just a paycheque – it is a means of self-reliance, a source of identity and pride, and a gateway to a brighter future.