



Yukon Speech-Language Pathology and Audiology Association
109 Copper Road, Whitehorse (H-4B) YT
Y1A 2Z7
info@yslpaa.org

January 4th, 2022

Currie Dixon, Chair
Standing Committee on Public Accounts
Yukon Legislative Assembly
2166-2nd Avenue
Whitehorse, YT Y1A 4P1

Dear Currie Dixon,

RE: Comment on current status of Department of Education response to Report of Auditor General of Canada to the Legislative Assembly of Yukon - Kindergarten Through Grade 12 Education in Yukon - Department of Education

The Advocacy Committee is writing on behalf of the Yukon Speech-Language Pathology and Audiology Association (YSLPAA) in response to a request to provide comment on the current status of the Department of Education's response to the *Auditor General of Canada to the Legislative Assembly of Yukon - Kindergarten Through Grade 12 Education*.

The association appreciates the opportunity to share our professional role within education and recommendations to better support Yukon students with the Standing Committee on Public Accounts.

A Speech-Language Pathologist's (S-LP) role and scope of practice within an education setting is vast and largely under utilized. S-LP's are an essential part of school based teams, being the only educational professional that is trained to assess, diagnose, and provide specific support and intervention to students with speech, language and communication disorders. These include students with speech sound disorders, language and literacy delays, those that stutter, require voice therapy or alternative and augmentative communication, and those with autism, Down's syndrome, cerebral palsy, FASD, traumatic brain injuries to list a few. An S-LP's work consists of assessment and diagnosing, providing individualized or group therapy with support of communication health assistants, and providing consultation/collaboration with educational teams and parents. S-LPs are also experienced interpreting best available research in combination with their clinical experience, and the values and preference of the student and their family in order to select the most optimal prevention, assessment, screening, treatment and service delivery



practices (SAC, Speech-Language Pathology and Audiology Canada Official Statement on Evidence-Based Speech-Language Pathology Practice in Schools, June 2021).

S-LPs have distinct knowledge in the development of understanding and use of written and oral language, and supporting student's learning and ability to make social connections. This knowledge set enhances academic, social, vocational and emotional outcomes by enabling access, participation and inclusion in the classroom (SAC, Speech-Language Pathology & Audiology Canada Position Statement on the Role of Speech-Language Pathologists in Schools, 2019).

Communication is a basic human right and education should provide equal opportunities for all students. Speech, language and communication skills are the foundation required for academic and social success. In order to ensure that **students are successful they require access to specialized speech, language and literacy services**. Currently there are not enough S-LPs employed in education across Canada to meet the needs as shown by numerous research studies (SAC, Speech-Language Pathology & Audiology Canada Position Statement on the Role of Speech-Language Pathologists in Schools, 2019). This and the wide scope of practice has led to the misunderstanding of the expertise of S-LPs as they have had to prioritize their services and delivery models.

Approximately **10% of students upon school entry have a language disorder** (SAC, Childhood Language Disorders, 2018). In 2017 there were approximately **5300 students enrolled in Yukon schools, this would suggest 530 students had an underlying language disorder**, who would presumably be on the S-LP caseload. However, due to the large caseload of students with speech sound disorders currently there is no capacity to provide individualized ongoing language therapy. Children with a **language impairment are 4 to 5 times more likely to have reading difficulties** and **30% of students with speech sounds disorders will also have a reading disability** (SAC, Language and Literacy Skills). Oral language and phonemic awareness skills (being able to identify and manipulate sounds) are the foundations in acquiring strong literacy skills, both of which are only under the scope of practice of an S-LP.

YSLPAA questions **how the student performance gaps and inadequate inclusive and special education services can improve if Yukon students are not able to access timely and accessible S-LP services**. The Office of the Auditor General's (OAG) 2019 Report and the Department of Education's commissioned Review of Inclusive and Special Education (RISE) report (Yee, 2021) made little mention of the S-LP services provided by Student Support Services (SSS) and their important role for academic and social success. The wide scope and distinct knowledge of **S-LPs** demonstrates that they **are key experts in student learning and their social and emotional development which contributes to overall life satisfaction both in and out of the school setting**.



The **Department of Education needs to recognize and invest in speech and language services**, which has been **repeatedly requested and advocated for by the dedicated S-LPs at SSS**. The Department requires **additional FTE allocation for S-LPs** in order to provide their specialized services in an equitable manner across the territory. Currently there are **four S-LPs at SSS to service the entire territory**, the last being hired in 2006. Their role is to provide consultative services and with support of their communication health assistants provide intervention within Whitehorse. For **rural schools intervention is inconsistent** due to staffing and variance of roles and responsibilities of support staff. The Department has rejected the need for increasing S-LP FTE although there is an **exploding caseload that is straining the capacity of SSS-S-LPs** and causing families to search out private services. The small Yukon S-LP private sector is now observing a gap in who can access their services. First Nations children are able to receive funding through Jordan's Principle and those with parents with extended health insurance have a small amount (\$400-\$1000 per fiscal year) to receive private therapy. Speech and language services through the Department of Education should provide equitable intervention for all students across the territory, but it is unable to support this with the large and diverse caseloads.

The territory has had a **growing population** since 2010 and specifically of adults aged 30-44, one can assume that these would include **young families** as well. This continues to contribute to the **growing need for S-LPs** within education. The current need for speech and language services within education far exceeds the capacity of four S-LPs. From **2020-2021 eight S-LPs were hired in other sectors within the territory**. YSLPAA questions that it is **not a matter of finding qualified individuals but rather the allocation of more S-LP FTE at Student Support Services to fill positions**.

The most **important concerns** identified in the OAG 2019 Report to the Yukon Legislative Assembly are the **long-standing student performance gaps**, which affect First Nation students to a large extent. The Department of Education's *Response Report - Audit 2019 recommendations* (Updated September 27, 2021) does mention these gaps in student achievement explicitly (see, for instance, the Initial Department Response to the OAG recommendations #42 and #70). However, the **question of student performance gaps is only marginally addressed in the final RISE report** (Yee, 2021) commissioned by the Department of Education. Knowing that the **RISE report will occupy a central role** in addressing the concerns underlined in the OAG's 2019 report, and yet, that this same report blatantly **minimizes these concerns**, members of YSLPAA are **deeply pessimistic about the Department of Education's capacity to address the persisting gaps in student achievement** - also the main focus of the OAG's 2009 report - this time around.

To our view, the most **important element in addressing educational achievement gaps relates to the adoption of Evidence-Based Practices**, of which the **RISE report makes no mention at any point**. As a response to this astonishing omission, YSLPAA **recommends a thorough review of the scientific literature on literacy and**



language instructional approaches and reviewing the Department of Education's literacy intervention recommendations, similar to the Ontario Human Rights Commission's Right to Read Inquiry (final report expected in February 2022).

S-LPs are essential to school literacy teams due to their wide knowledge of normal and disordered speech, language and literacy development (SAC, Speech-Language & Audiology Canada, Official Statement on Evidence-Based Speech-Language Pathology Practice in Schools). As **reading and writing development are dependent on oral language skills, S-LPs are in a unique position to be able to support educators in selection of evidence-based literacy practices**. There is a robust body of research that suggests reading success is critically dependent on building oral language skills and systematic instruction in letter-sound knowledge and phonemic awareness (SAC, Speech-Language & Audiology Canada, Official Statement on Evidence-Based Speech-Language Pathology Practice in Schools). S-LPs have the expertise to make evidence-based recommendations to support *all* students to develop strong reading and writing skills.

Within the Yukon Education Recovery Plan (December 2021) literacy is stated as a priority for all grades, K-12. The Department of Education *recommends* the use of Fountas and Pinnell literacy programs and the use of a balanced literacy approach. The lack of a *mandate* to be used across the territory will continue to lead to inconsistent use across schools and YSLPAA **questions how the Department will be able to track progress and monitor efficacy of it's recommended literacy intervention programs if there is no mandate to be used across the territory**. YSLPAA also **questions the critical analysis taken to select a balanced literacy approach over use of science of reading for literacy instruction as well if consultation was undertaken with literacy experts, SSS-S-LPs, prior to the purchasing of the Fountas & Pinnell program**.

The final area of concern to YSLPAA from the OAG 2019 Report is the inadequate inclusive education for students with special needs. S-LPs are key players in supporting students with special needs given their knowledge to provide access to the classroom curriculum, development of communication skills and ability to support social connections. S-LPs have an important role in Individual Education Plan (IEP) development to provide recommendations on goal setting and strategies to be used by teachers and educational assistants. However, **due to the large caseload sizes follow-up on use of recommendations and training is difficult to manage**. Again, if there were **additional FTE within SSS for S-LPs more support could be provided to the school teams on how to be inclusive and use specific strategies these students require to thrive in and out of the school setting**. The RISE report recommended the creation of a Community of Inquiry to explore solutions for inclusive education, YSLPAA **questions who is participating in the RISE recommended Community of Inquiry and if it does indeed include members outside the Department of Education**.



Overall, it is the opinion of the YSLPAA Advocacy Committee that the **Department of Education will not be successful in fulfilling the 2019 OAG's recommendations** and that the 2029 OAG's report on the state of education in Yukon will resemble that of its predecessors **unless the Department takes actionable steps to rectify decades of inaction.** The Department can begin by:

- **Acknowledging the expertise and consulting with the highly qualified educational experts within their own department, the S-LPs.**
- **Support the use of evidence-based practices for literacy and language development.**
- **Provide additional S-LP FTE at Student Support Services to be able to provide adequate speech, language and literacy services.**
- **Conduct a thorough review of literacy and language instruction to address how to close widening performance gaps that continue to be exacerbated by the COVID-19 pandemic.**
- **Review of membership of the Community of Inquiry.**

YSLPAA thanks the Standing Committee on Public Accounts for reading our letter and taking into account our recommendations. The YSLPAA Advocacy committee looks forward to working with the Yukon Legislature to ensure that all Yukon students can receive equitable access to speech, language and literacy services.

Sincerely,

Kelsey Kerr, MSc., R-SLP (C)
Registered Speech-Language Pathologist
Chair YSLPAA Advocacy Committee
treasurer@yslpaa.org