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February 27, 2020

Honourable Katrine Conroy  
Room 134 Parliament Buildings  
Victoria, BC V8V 1X4  
Sent via Email: [katrine.conroy.MLA@leg.bc.ca](mailto:katrine.conroy.MLA@leg.bc.ca)  
and registered post

Dear Minister Conroy,

On behalf of the Board of Directors of Deaf Children's Society of BC and the children and families we serve, I am writing to you to express my grave concerns for the current funding status of programs and services for Deaf and Hard of Hearing children from birth to age five.

By now you are well aware of the statistics and funding associated with Early Intervention for Deaf and Hard of Hearing Children. Ten years ago the number of Deaf and Hard of Hearing children accessing Early Intervention services in the province was approximately 250. Today that number has more than doubled (547) and yet the funding has remained the same. Today there is less than \$2,900 per family annually for all services related to Early Intervention programming.

Current practice based on the approved Request for Proposal submitted by BC Family Hearing Resource Society to the Ministry of Child and Family Development in 2014 recognizes the following service deliverables:

- Weekly service provision for families to access speech & language services in the family home
- Weekly service provision for families to access sign language instruction in the family home
- Targeted funding for the provision of group sign language services, such as sign language instruction for families and preschool for Deaf children using sign language
- Targeted funding for the provision of group speech & language services, such as preschool for Deaf and Hard of Hearing children using spoken language
- Targeted funding for the provision of Outreach travel and service related expenses

This service delivery model has proven very successful and is evidenced in the significant increase in families accessing and depending on all of these services.

Decades of research and experience has taught us that without access to early language and learning, Deaf children are at great risk of language deprivation. Incomplete language acquisition creates life-long consequences on a Deaf child's capacity for cognitive development, language processing, literacy, memory, comprehension and reasoning skills, ultimately impacting educational and quality of life outcomes.

Language deprivation and its cognitive repercussions are not the result of something lacking within the Deaf child. It is the direct result of not providing cognitive and linguistic stimuli in a visual language that is 100% accessible which **creates a disability where none existed in the first place**. In preschool, children learn the skills required to be ready for kindergarten. They begin their journey into acquiring proficiency in cognitive academic language. For a Deaf child, this developmental process is even more crucial. While some families choose the BC School for the Deaf for their child's k-12 education (a fully accessible environment), many families exercise their right to register their child in their neighborhood school, in a mainstream environment. In this case, the Deaf child will be accessing their kindergarten learning through an interpreter. This kind of mediated learning environment requires a strong foundation in a first language. How can a child achieve this level of linguistic competency in a preschool, classroom or family setting with limited or no access to American Sign Language? Access to Early Intervention programming in a preschool environment specifically designed for a Deaf child is a crucial and life-affirming developmental process.

We understand that BC Family Hearing Resource Society (BCFHRS) currently holds the contract for Early Intervention funding. We would like to bring your attention to some important aspects of the contract, recent changes to the funding model, and their resulting impact on services to Deaf children:

- As per the RFP and associated Services Agreement, MCFD expected the successful Proponent to be responsible for services and programs including both **individual** and **group** language development services. **The Contractor has now removed all targeted funding for group services**. As a result, the Preschool Programs at Deaf Children's Society and Children's Hearing and Speech Centre have lost all funding to run these life-saving programs. **Without access to appropriate targeted funding, the Deaf Children's Society Preschool will be forced to close its doors. At a time when the Government of BC and the Federal Government of Canada are pouring millions of dollars into the establishment of new child care and preschool centres for children, it is unacceptable to be faced with closure of such a specialized preschool for signing Deaf children. In fact, the Deaf Children's Society Preschool is the ONLY preschool in all of BC which offers American Sign Language as the language of instruction.** Please refer to Appendix C,D,E, for further information and discussion.
- For the 2020 fiscal year, the Board of Directors of BCFHRS has unilaterally made the decision to eliminate all **targeted funding for American Sign Language Services**. These decisions are not reflective of the "Guiding Principles" documentation outlined on page 5 of the initial Request for Proposals produced by MCFD. It is not possible to provide effective speech,

language, and sign language instruction to Deaf children and their families for less than \$2900 per year. Please refer to Appendices A-E for further rationale.

- For the 2020 fiscal year, the Board of Directors of BCFHRS has unilaterally made the decision to **remove all targeted funding for Outreach travel expenses**. This eliminates the opportunity to provide direct services to families and to coordinate service planning for families through agencies within their communities. Section 1(d) of the RFP states a requirement of coordinated services throughout BC. This cannot happen without adequate targeted funding.

As a result of these extreme changes to the funding and service delivery model, Deaf Children's Society of BC is asking the Ministry of Child and Family Development to protect services for Deaf signing children in British Columbia.

- We ask that the MCFD acknowledge the vulnerability of Deaf children and their families as outlined in the Berger Report and the Public Report No.32 provided by the Office of the Ombudsman of BC and provide the **appropriate targeted funding for services for signing Deaf children in BC**. Specifically, we ask for your immediate action in providing the following:
  - providing appropriate **targeted** funding for preschool programming at the Deaf Children's Society Preschool in Burnaby BC.
  - providing appropriate **targeted** funding for American Sign Language instruction for Deaf children and their families in BC.
- We also ask for your immediate action in providing appropriate **targeted** funding for Outreach services and supports for Deaf and Hard of Hearing children provincially.
- We recommend that the Ministry of Child and Family Development re-establish the Ministerial committee known as the "Knowledge Keepers" Committee (also known as Provincial Education Review Committee for the Deaf (PERCD) to act as a working group and advise MCFD on a potential provincial model for Early Intervention services for Deaf and Hard of Hearing children from birth to age five. This committee should include representatives from all three current Early Intervention agencies for Deaf children.
  - Further, we suggest that representatives from Family Network for Deaf Children, BC Early Hearing Program, Children's Hospital Cochlear Implant Team, SunnyHill Hearing Loss Resource Team, Canadian Association of Educators of the Deaf and Hard of Hearing, Greater Vancouver Association of the Deaf, Island Deaf and Hard of Hearing Centre and family stakeholders all be allowed to provide input and feedback to this committee
- We ask that the Ministry consider incorporating Deaf Children's Society of BC under the umbrella of Provincial Deaf and Hard of Hearing services.
- We ask that any decision making processes around Early Intervention programs and services for Deaf children in BC **always include equal representation of culturally Deaf persons** and hearing persons and honour the UN Principle of "Nothing About Us, Without Us"

Further, Deaf Children's Society provides the following submissions as additional rationale to support our recommendations:

Appendix A: Funding

Appendix B: Ministry of Health

Appendix C: Principles of Learning for Deaf and Hard of Hearing Children

Appendix D: Report of Special Counsel regarding Claims Arising out of Sexual Abuse at Jericho Hill School

Appendix E: Government Investment in Early Childhood Education

The funding model for Early Intervention for Deaf and Hard of Hearing children for the 2020 fiscal year is unjust. In a time when the Government of BC is focussing on accessibility issues and building new child care centres in BC, the lack of targeted funding for sign language services and Deaf preschools is unacceptable. In fact, these actions will undoubtedly contribute to the decline of language and cognitive capacity in young Deaf children, weaken family units, lower graduation rates of Deaf children, increase unemployment rates of Deaf adults, and significantly impact the mental health needs of Deaf children, youth and adults. We implore you to attend to this matter and reinstate and provide appropriate targeted funding for Deaf preschools and sign language services. We also request a meeting with your offices as soon as possible.

Thank you for your attention to this urgent matter. I remain,

Sincerely,



Lisa Meneian

Executive Director,

Deaf Children's Society of BC

Cc: PDHHS: Rebecca Storey, Diana Tarchuk, Melissa Mykle

Kevena Hall, Executive Director, CYSN

Jennifer Helmy, Senior Director, Affordable Child Care Benefit

Executive Directors, Board of Directors, BC Family Hearing Resource Society

Executive Directors, Board of Directors, Children's Hearing and Speech Centre BC

MLA, Michelle Stilwell

MLA, Laurie Throness

Honourable David Eby

Family Network for Deaf Children

BC School for the Deaf

BC Deaf Education Committee

Greater Vancouver Association of the Deaf

Deaf, Hard of Hearing & Deaf-Blind Well-Being Program

Early Hearing Program

SunnyHill Hearing Loss Resource Team

BC Children's Hospital Cochlear Implant Team

BC Hands & Voices

Western Institute for the Deaf and Hard of Hearing

Island Deaf and Hard of Hearing

*The Deaf Children's Society of BC acknowledges the financial contributions and support of the Ministry of Children & Family Development, BC Early Hearing Program and the City of Burnaby. DCS is a CARF accredited organization.*

## APPENDIX A

### Funding

Unfortunately, the funding model associated with this approved service delivery model (since its inception in 2014) was never financially viable and has resulted in severe financial deficits in all three Early Intervention programs. DCS is concerned that MCFD entered into an approved RFP with BC Family Hearing Resource Society and did not provide the funding associated with delivering expected and approved service deliverables.

- Based on expected numbers of clients accessing services in speech and sign language, we anticipate the approximate cost to provide services based on the originally approved model to be approximately \$5,000,000, and MCFD has only provided \$1,600,000
- No funds have been provided for administration and operations including office management, accounting, leadership, property costs, insurance, etc, to any agency other than BCFHRS and the amount provided to them does not represent the costs required to administer the programs
- The fee-for-service model is a highly medical based model that was accepted and implemented into a family-centered, educationally based service model. This fee-for-service model has been financially destructive to all three Early Intervention agencies. In order to provide the outlined services, we must hire staff. Regardless of family illness, staff illness, statutory holidays, etc, we must pay our staff. A fee-for-service model does not support a viable educational service delivery model and is not respectful of the changing needs of families.
- The hourly wage currently allocated per professional service is approximately 50% of the actual cost to provide services
- There is no provision of costs for Registered Sign Language Interpreters or other spoken language interpreters, **leaving all costs associated with accessibility to Ministry based services to the contractor and approved sub-contractors.** Furthermore, despite the requirement to have both hearing and Deaf staff providing services, costs associated with accessibility have been left to contractors and approved sub-contractors. Lack of provision of funds for hiring other-language interpreters does not support family-centred practice.
- BC Family Hearing Resource Society has been compensated for staff salary increases. The approved sub-contractors face imposed salary increases that have not been recognized in the funding provisions.
- Ten years ago MCFD funding represented 75% of the overall operating budget for Deaf Children's Society. Today MCFD funding represents 35% of our operating budget and projections for the next fiscal year, beginning April 1, 2020, have it falling to 18% of our overall operating budget based on confirmed changes to the funding model by BC Family Hearing Resource Society.
- At our meeting with Kevena Hall on March 14, 2019 we provided a staffing breakdown of the costs required to appropriately staff programs and meet service delivery expectations.

## APPENDIX B

### The Ministry of Health

The Ministry of Health spends millions of dollars annually to maintain the Early Hearing Program and provide Cochlear Implantation for babies. How can this investment be truly successful if funding is not also provided to maintain family-centered, quality language and learning programs and services through the early years? Diagnosis is insufficient. Successful use of hearing aids and cochlear implantation is dependent on habilitation programming. Children experience varying levels of “success” with hearing aids and cochlear implantation, thus many will rely on ASL as their first and primary language. Successful development of a first language such as ASL requires quality, consistent Early Intervention support and programs. Similarly, successful use of hearing aids and cochlear implants for the development of spoken English requires quality, consistent Early Intervention support and programs. For many Deaf and Hard of Hearing children, their ability to access spoken language through hearing aids and cochlear implants takes years to be determined, but will be strongly dependent on access to speech and language habilitation programming in an Early Intervention setting such as Deaf Children’s Society of BC, Children’s Hearing and Speech Centre of BC, and BC Family Hearing Resource Centre.

## APPENDIX C

### Principles of Learning for Deaf and Hard of Hearing Children

I am providing you with a document entitled “Principles of Learning for Deaf and Hard of Hearing Students”. This document was developed collaboratively with Ministry of Education representatives and the BC Deaf Education Committee. It describes the key factors for successful learning environments for Deaf children.

In particular,

- opportunities to learn in accessible learning environments (ASL and English provided as languages of instruction),
- opportunities to learn from highly skilled and trained teachers and staff knowledgeable in Deaf education,
- opportunities to learn with peers using American Sign Language to share their thoughts, ideas, opinions, and learning.

We ask for your support in ensuring that these factors are realized for Deaf children through accessible learning environments and improved Outreach services from Early Intervention centers such as Deaf Children’s Society of BC, including Preschools for Deaf children at both DCS and Children’s Hearing and Speech Centre.

## APPENDIX D

### Report of Special Counsel regarding Claims Arising out of Sexual Abuse at Jericho Hill School

In 1995 Mr Thomas Berger (Special Counsel) submitted a report to the Ministry of the Attorney General in which he considered the Province's responsibility in the sexual abuse allegations which took place at the Jericho Hill School for the Deaf and associated recommendations. In this report, Mr Berger made the following observations:

- Mr Berger investigated: "the difficulties of language and communication for students at Jericho Hill School and the relationship of these difficulties to the incidence of sexual abuse" (p4)
- Mr Berger found that: "learning sign language gives them (Deaf persons) a first language which is the means to enable them to become literate in English, that is, to read and write in English" (p5)
- "because of low achievement of deaf children under the oral system, the deaf community and educators of the deaf have sought to establish or re-establish ASL as the principal language of the deaf in North America" (p5)
- "for most deaf persons sign language is the key to the acquisition of language; for them it is the gateway to the development of literacy" (p6)
- "to compound this problem, illiteracy, unemployment, and underemployment rates are inordinately high among the deaf population. To be sure, there are other variables than mainstreaming itself that adversely impact the deaf youth's mental health such as a poor communication situation at home, feeling a lack of full acceptance by the family, and poor school performance" (reported from Roger Carver)(p6)
- "the controversy over language -signed or oral- and the paucity of qualified teachers of the deaf and of child care workers with true signing skills meant that children who attended Jericho Hill School did not always learn either sign language or the oral method adequately. Moreover, since most hearing parents did not sign, or at least did not sign well, the children often had no parental guidance. The deficiencies in their grasp of language meant that they may have been inadequately socialized" (p7)
- "the vulnerability of the children at Jericho Hill School was the product of their failure to acquire language early; this meant that they did not have values instilled in them in the same way as hearing children do; it often meant increased vulnerability ..... the children did not have the means to communicate with or complain effectively to parents, teachers, physicians, police or social workers about sexual abuse." (p7)
- "These issues are not superficial. They have a great bearing on the development of the child as a human being. Language ability and a sense of self are intimately connected" (p7)

In this report, Mr Berger made the following recommendations:

- "There must be a commitment to deaf education at the Pre-school level and from Kindergarten to Grade 12" (p37)

- “The advantage of ASL (over signed english) is that it is a language, a complete means of expression” (p37)
- “If children are going to be less vulnerable, they must acquire a sense of values, they must have confidence in themselves, and they must be given the means to communicate with their teachers, doctors, nurses and social workers, and especially with their parents” (p37)
- “It is vital that hearing parents of deaf children and hearing brothers and sisters of deaf children learn sign language. If deaf children are to develop a set of values and have that measure of protection which family membership ought to bring, they must be able to communicate with family members from an early age...”(p37)
- “It is intolerable for a society to contenance a situation in which children can’t communicate with their parents.” (p37)
- “ASL lessons and materials should be provided to parents of deaf children....it may be best that sign language instruction be provided in the home, since in this way family members, including siblings, would have access to sign language instruction.....the Province should confer with the Network (FNDC) and any other organized parents’ group” (p37)

In a similar report by the Office of the Ombudsman of BC in 1993 identified several key points related to the vulnerability of Deaf children at Jericho Hill School, namely, it identifies the United Nations Convention on the Right of the Child which “affirms our belief that the state as a role to play to support parents and families. Article 18.2 identifies our obligation to provide support”:

For the purpose of guaranteeing and promoting the rights set forth in the present Convention, States Parties shall render appropriate assistance to parents and legal guardians in the performance of their child-rearing responsibilities and shall ensure the development of institutions, facilities and services for the care of children

and further observes that “we have talked to parents of Deaf children who told us that they could not communicate with their children. When parents and children cannot communicate with each other, we cannot expect the parents to feel adequate about fulfilling that fundamental duty of safeguarding their children’s right to be safe, protecting them from harm.....”. This statement led the Ombudsman office to provide Recommendation #7: Government should make available publicly-funded ASL Instruction services accessible throughout the province, for parents and families of Deaf children...”

Regarding the Berger Report and the outcomes of the recommendations put forth, it is the belief of Deaf Children’s Society of BC that all of the recommendations brought forth in the governments individual and community based compensation plans were realized including the following:

- Deaf Well Being Program for mental health support
- BC School for the Deaf continued funding support
- Provincial Deaf and Hard of Hearing Services for the provision of language, education, family and employment support
- Deaf Community Foundation funding to support the health of the Deaf Community

*The Deaf Children’s Society of BC acknowledges the financial contributions and support of the Ministry of Children & Family Development, BC Early Hearing Program and the City of Burnaby. DCS is a CARF accredited organization.*

- Deaf Youth Today programming offered through Family Network for Deaf Children  
However, we believe that services for signing Deaf children from birth to 5 have yet to be protected, as evidenced in the **lack of targeted funding for family ASL instruction and lack of targeted funding for preschool programs for Deaf children.**

We ask that the Ministry of Child and Family Development acknowledge the vulnerability of Deaf children and their families as outlined in the Berger Report and the Public Report No.32 provided by the Office of the Ombudsman of BC and provide the appropriate targeted funding.

[http://www.llbc.leg.bc.ca/public/pubdocs/bcdocs2017\\_2/215813/report\\_of\\_special\\_counsel.pdf](http://www.llbc.leg.bc.ca/public/pubdocs/bcdocs2017_2/215813/report_of_special_counsel.pdf)

<https://www.bcombudsperson.ca/sites/default/files/Public%20Report%20No%20-%2032%20Abuse%20of%20deaf%20Students%20at%20Jericho%20Hill%20School.pdf>

## APPENDIX E

### Government Investment in Early Childhood Education

While we acknowledge the investment that the Province of BC has recently placed on early learning, despite these efforts, this exorbitant amount of funding has done little to effect supports for Deaf and Hard of Hearing children in Early Intervention programs. The BC Government and Government of Canada have invested over a billion dollars into early childhood education and **yet Early Intervention programs for Deaf and Hard of Hearing children are facing the most severe funding shortages in decades resulting in:**

- **potential closures to group child care/preschool programs**
- **severe cuts to individualized speech-language therapy**
- **severe cuts to individualized American Sign Language instruction for Deaf children and their families**
- **elimination of all Outreach travel to support children and their families in communities outside of the lower mainland**

I bring to your attention a few key phrases outlined in four provincial government publications which outline Ministry positions and mandates related to Early Intervention in BC: *“The Best Investment: Early Childhood Education”*, *“Early Childhood Educators Matter”*, *“Child Care BC Caring For Kids, Lifting Up Families”* and *“BC-Canada Early Learning and Child Care Agreement Report on Progress and Results Achieved in Year 1”*. Please note the following excerpts from these documents:

- *“Early Childhood development is the building block of a healthy and prosperous society”*
- *“When we give children today what they need to learn, develop and thrive, they give back to society in the future through a lifetime of productive citizenship and success”*
- *“The quality of a child’s experiences in the first few years of life is critical to their lifelong success”*
- *For every \$1 spent on the early years, almost \$6 are returned to the economy “greater returns than investments in any other stage of education”*
- *Investing in early care and learning programs and professionals creates employment in that sector and helps to increase economic activity in the community (Deaf community)*
  - While these statements are true for all children, they are crucial for Deaf children and for Deaf Communities. Unemployment rates for Deaf persons are disparagingly high. Studies over the past two decades have shown that Deaf communities are their own best employers and that entrepreneurial self-employment rates in the Deaf community are rapidly increasing. Quality education is at the root of this success.

see: <http://cad.ca/issues-positions/employment-and-employability/>

- What measures is the BC Government taking to ensure these statements are reflective of early learning programs and services for Deaf and Hard of Hearing children? **Why is Deaf Children’s Society Preschool facing closure while the Provincial Government is investing millions of dollars to establish new child care facilities and programs ?**
- *“Quality early care and childhood education helps reduce social inequalities and the gaps in school readiness for children from different social and economic backgrounds”*
  - Deaf and Hard of Hearing children face a **unique social inequality -that being access to language**. As an educator of 25 years in the field of Deaf Education, I have seen first-hand the heart-wrenching consequences of children that enter kindergarten having limited language compared with those that have not only had a strong early learning foundation but also have had the benefit of growing and learning with Deaf and Hard of Hearing peers and role models. I am proud to say that children that graduate from the Deaf Children’s Society preschool enter Kindergarten with all of the necessary readiness skills to prepare them for a successful education in the k-12 system.
- *“25.6 million dollars in ECE training and programs investment + ECE Wage Enhancement =\$136 million over 3 years to enhance quality of care”*
- *“\$1 Billion over 3 years to child care -biggest investment in BC history -laying foundation for service”*
  - Over \$161 million dollars in training and wage enhancement and yet there are no funds available for centers like **DCS to provide training and build local capacity of ECE’s in the province**. We have well trained staff and the functional capacity to provide training to the ECE staff at early learning centres and preschools provincially to develop ASL skills and knowledge around accessible learning practices for Deaf and Hard of Hearing children and **no funding** to do so.
- *“Significant support for doing more to integrate child care and education -offer better links between child care and our school system”*
  - Deaf Children’s Society preschool exists within the same building as the BC School for the Deaf and South Slope Elementary School. We are in the best position to prepare Deaf and Hard of Hearing children for entry to school.
  - The **best link between child care/early learning programs and the school system for Deaf children is accessible learning centers and practices**
- *“Providing additional funding to reduce waitlists for Supported Child Development and Aboriginal Supported Development programs....helping children access the services they need to succeed”*
- *“Investing \$630 million over 3 years to improve affordability....offer immediate relief for parents”*
  - In order to offer both preschool and before and after child care for working families, DCS (like many other centers) must be licenced as “group child care” rather than “preschool”. Yet “group child care” licencing has many more

restrictions to accessing the Affordable Child Care Benefit for parents, as well as longer wait lists for Supported Child Development services. Licencing regulations are unfairly restricting family access funding for preschools.

- *“Committed to a sustainable path”*
  - With a 39 year history of supporting Deaf and Hard of Hearing children all over BC, DCS faces the greatest funding shortage as the population of children continues to grow.
  - **What does a government commitment to a sustainable path look like for families of Deaf and Hard of Hearing children provincially ?**