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Toronto Catholic District School Board
Catholic Education Centre
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September 26, 2019

Dear Toronto Catholic District School Board,

Recently, the Ontario Ministry of Education announced PPM (Policy/Program Memorandum) 163, which aims to improve access to service animals in schools.

While we applaud the government's efforts to open access to service animals within schools and provide clarity to school boards, the CNIB Foundation has some specific recommendations pertaining to guide dogs.

The Ontario Blind Persons' Rights Act (BPRA) was enacted in 1990. This Act "applies despite any other act or regulation by law or rule made thereunder R.S.O. 1990, c. B.7, s.1(2)." This Act states that no person shall deny accommodations, services, or facilities available in any place to which the public is customarily admitted, for the reason that the person is blind and accompanied by a guide dog.

The CNIB Foundation recommends that school board policies differentiate between guide dogs and service dogs for the following reasons:

1. Under the BPRA, students, parents, volunteers and staff cannot be denied accommodations, services or access to facilities because they are blind and accompanied by a guide dog. For this reason, there's no need to discuss whether a person with a guide dog is permitted in a school, provided the guide dog was trained at an internationally accredited school, as outlined in the regulations of the BPRA.

2. Unlike service dogs, there is no need to discuss who will care for the guide dog, since guide dog handlers (i.e. users) are responsible for caring for their dogs, and the dogs are with them at all times for navigational purposes.

3. Most guide dog schools have a minimum age requirement of 16 or 18 years old, so it would be rare for a student to have a guide dog at school. However, there will be situations where parents, volunteers or staff may need to bring a guide dog into the school. Therefore, school boards and principals should be familiar with the BPRA.

To read the CNIB Foundation's recommendations regarding PPM (Policy/Program Memorandum) 163, please visit <https://cnib.ca/en/news/cnib-response-draft-policy-school-board-policies-service-animals>. We would welcome an opportunity to work with you as your school board develops/reviews its service animal policies.

If you would like more information about guide dogs, including school presentations and educational resources, please let me know.

Sincerely,

Victoria Nolan

Head, Stakeholder Relations and Community Engagement

CNIB Guide Dogs

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