Speech-Language & Audiology Canada Submission: Advancing Artificial Intelligence (AI)Transparency in Canada

Submitted to: Innovation, Science and Economic Development Canada

Re: Enhancing Trust in Artificial Intelligence Through Increased Transparency

Speech-Language & Audiology Canada (SAC) is the only national association representing over 7,000 speech-language pathologists (S-LPs), audiologists, and communication health assistants (CHAs) across Canada. SAC members support people of all ages with communication, swallowing, hearing and balance needs across health, education, community and private-practice settings. SAC advocates for equitable access to communication health services.

AI may support communication health through applications such as hearing screening, AI-enabled hearing technologies, augmentative and alternative communication (AAC), virtual care, captioning and transcription. When used appropriately, these tools may also help improve access to services in rural, remote and underserved communities.

However, AI can create new barriers when communication accessibility is not considered from the outset. This is particularly important given the number of Canadians who may encounter accessibility barriers. In 2022, 27% of Canadians aged 15 years and older, approximately eight million people, reported one or more disabilities that limited their daily activities[1]. More than 1.6 million Canadians had a hearing disability[2], and almost two-thirds of people with hearing disabilities reported experiencing a communication-related accessibility barrier[3]. People with speech, language, fluency, voice, hearing, and cognitive-communication disorders are at particular risk of misrecognition, misunderstanding, or exclusion when AI systems are not transparent or accessible.

To ensure that AI transparency measures are meaningful and usable for all Canadians, they must account for diverse communication, hearing, cognitive and literacy needs from the outset. Measures should be informed by Accessibility Standards Canada's CAN-ASC-6.2:2025 (Accessible and Equitable AI Systems), CAN-ASC-3.1:2025 (Plain Language), and CAN/ASC-EN 301 549:2024 (ICT accessibility).

[1] Statistics Canada, *Canadian Survey on Disability, 2017 to 2022* (2023).
[2] Statistics Canada, *Hearing Disabilities, 2022* (2025).
[3] Statistics Canada, *The Majority of Canadians with a Hearing Disability Face Communication Barriers* (2026).

SAC therefore recommends the following measures:

1. Require clear and accessible disclosure of AI use

Canadians should be clearly informed when they are interacting with AI or receiving AI-generated content or AI-altered content, especially in high-impact contexts (healthcare, education, justice, income supports, housing, and public services).

Disclosures should be:

- Multimodal and accessible: they should be timely, available in plain language and multiple accessible formats, including text, audio, visual symbols, haptic cues, captioned content and AAC-compatible formats.
- Informative: Disclosures should include what the AI does, its intended use, known limitations, including performance for atypical speech/voice/language, the role of human oversight, and how to challenge an outcome and/or obtain human help.
- Human alternative: In high-impact settings, people should be able to obtain human assistance in a timely manner upon request. No one should be denied access to, or receive reduced access to, a service because they cannot use an AI-enabled system.

2. Embed accessibility and disability inclusion

AI systems and transparency measures should be co-designed, tested, and continuously monitored with people with communication disabilities.

This includes:

- Participation of people with communication disabilities in design, data collection and labeling, training, testing, deployment, and post-deployment monitoring.
- Testing with people whose speech, language, hearing, voice, cognition or communication methods may not be adequately represented in development data, including people who use AAC or sign languages.
- Evaluation of accuracy, safety and potential bias across relevant populations and communication characteristics, with public reporting where appropriate.
- Accessible documentation and notices, and a simple, accessible process to contest AI-driven decisions or request human review.

This will help ensure that AI tools and disclosures are accessible and do not create new barriers to information and services.

3. Assign responsibility for accessible transparency

Developers should provide accurate, accessible information about an AI system's capabilities and limitations. Organizations deploying AI should ensure that notices, consent processes, human support and pathways to challenge an outcome are accessible and appropriate to the context in which the system is used.

Conclusion

Canada's approach to AI transparency must work for all Canadians, including people with communication, hearing, cognitive and literacy-related disabilities. *Transparency cannot achieve its intended purpose if people cannot access, understand or act on the information being provided.* Accessibility, clear communication and meaningful pathways to human assistance or review should therefore be incorporated into AI transparency requirements from the outset.