

Council of Senior Business Officials (COSBO)

Budget and Funding Gap Committee

2021 – 2022 Education Funding Submission

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About the Council of Senior Business Officials (COSBO)

The Council of Senior Business Officials (COSBO) was established in 2001 and includes membership of Senior Business Officials from all boards in Ontario. The members are financial and business professionals with experience from both private and public sectors.

The executive membership meets monthly and consists of the following representation:

- 3 members from French Boards
- 6 members from English Catholic Boards
- 6 members from English Public Boards

COSBO's priorities align with the following ends:

- To collaborate with the Ministry of Education through the provision of discreet and candid advice, guidance, and feedback on various policy issues
- To ensure there is on-going, timely, and open communication between school boards and the Ministry of Education
- To ensure an ongoing and mutually beneficial relationship with the Council of Ontario Directors of Education (CODE) and where agreeable to co-ordinate work of mutual interest
- To collaborate with the Ontario Association of School Business Officials' (OASBO) office, board, and committees to advance matters of importance and mutual interest
- To collaborate with the Council of Senior Human Resource Officials (COSHRO) to ensure collective bargaining processes are carried out in a systematic manner with consideration given to pressures faced by operational leaders in the sector
- To provide leadership, support, and opportunities for professional development, networking, and collaboration to the membership
- To promote innovative and leading practices in the area of school business

Budget and Funding Gap Committee

Members of COSBO and the COSBO Executive Director have formed a working group to identify and address Budget and Funding Gaps with the Ministry of Education. The Committee met several times during December 2020 and January 2021 in order to provide a response to the Ministry of Education's 2021-2022 Education Funding Consultation. The committee surveyed school boards and worked with Trustee Associations to inform this submission. A special thanks to the Ontario Public School Board Association, Ontario Catholic School Trustee Association, and l'Association des conseils scolaires des écoles publiques de l'Ontario.

The following are the members of the Budget and Funding Gap Committee.

- Matthew Gerard, Waterloo Region District School Board (Chair)
- Amy Janssens, St. Clair Catholic District School Board
- Roxana Negoï, Halton District School Board
- Laura Mills, Rainy River District School Board
- Lisa Schimmens, Ottawa Catholic District School Board
- Tracy Dottori, Conseil scolaire public du Nord Est de l'Ontario
- Pete Derochie, COSBO Executive Director

School boards have worked tirelessly to support student achievement and well-being during the COVID-19 Pandemic. The Ministry of Education and the Government of Ontario have been exceptional in their response to the expressed needs of the sector through the provision of additional financial resources and personal protective equipment. The flexibility and timeliness of the funding to the sector has been greatly appreciated. COSBO is once again thankful for the opportunity to consult on funding to school boards.

Finally, the COSBO Budget and Funding Gaps Committee would like to express our appreciation to the Senior Business Officials and the members of their teams who contributed their time to developing this report.

COVID-19 Outbreak Response

This 2020-21 school year has brought new challenges due to the COVID-19 outbreak. In response, Ontario made almost \$1.3 billion in resources available to school boards to support the safe reopening of schools, which includes \$381 million in federal funds. The government's investments include additional supports for additional teachers and custodians, special education and mental health, technology-related costs, cleaning and safety measures, improved ventilation and HVAC system effectiveness, administrative staff to oversee virtual schools, and flexible funding to support a range of activities based on school board priorities.

Considerations

- 1. How do we ensure that the GSN remains agile to continue to respond to the COVID-19 outbreak?*

Stability of Funding

Although the Ministry has advised school boards to plan for a return to a normal school year in September 2021, there remain a significant number of unknowns that make it difficult to plan for the 2021-2022 school year. To support the school boards' ongoing response to the COVID-19 outbreak, stability in funding will undoubtedly be required.

- The stabilization of funding provided through both the GSN and PPF should be contemplated. This is particularly important should school boards need to continue with two learning models or pivot between models.
- Stabilization funding should consider language grants, enrolment fluctuations, and the impact of emergency orders on other sources of revenues, such as rental revenues, community use of schools, and school generated funds.
- School boards will need direction on the assumptions that should be made when developing enrolment projection estimates for the 2021-2022 school year.

Timely Release of the GSN Package

The timely release of the GSN, PPF, and any available federal funding would aid in adequate planning and execution of the resources required for 2021-2022:

- Return to the March release of the funding announcements if possible.
- Efficient and effective operating results are achieved when boards allocate resources, both staff and others, during budget development.
- In-year changes to funding are difficult to manage and may not result in the expected outcomes.

Flexibility of Funding

Flexibility is key to responding to local needs, whether they are forecasted or unexpected.

- To improve agility, reduce the amount of enveloping, allowing boards to dynamically deploy resources based on local priorities.
- Additional enveloping of grants within the GSN for 2021-2022 will not serve the needs of our communities and students at this time.
- Allow boards the ability to access 2020-2021 deferred funds to support additional COVID-19 expenses as required.
- Announce PPF alongside the GSN to assist with effective planning and use of the funds.
- Extend the date of unused 2020-2021 PPF as an option to redeploy towards COVID-19 expenses.

Additional Considerations

Boards must continue demonstrating agility in the face of responding to COVID-19.

- Re-evaluate the administrative overhead and adjust the School Board Administration and School Operations Grants accordingly.
- The current funding underestimates the needs at this time, and in particular, the increased work related to health and safety, staffing, ELHT, labour relations, absence support, increased Ministry reporting, handling of PPE, energy conservation, pupil accommodations and crisis communication.

- Adjustment to the board's cash flow has resulted in lost interest revenue and in addition COVID-19 has resulted in the reduction of many other sources of revenue that were once available to support administration.
- Physical distance is key to stopping the spread of COVID-19. Smaller class sizes require more space and boards could utilize funding for temporary accommodation.
- Funding to implement Enterprise Risk Management Frameworks that align to the Provincial Risk Management Framework would be beneficial for data driven decisions based on risk assessments.

2. *What's required to successfully help students post COVID-19?*

Mental Health and Wellness Supports / Attendance Counselling

There is no greater need post COVID-19 than to support the mental health and wellness of staff, students, and families.

- Permanent funding in the GSN to recognize the importance of this work will enable high student achievement for all, achieve quality outcomes and ensure confidence in publicly funded education.
- Permanent investments to support the hiring of additional specialized support staff will support the needs of all students, especially those at-risk, transitioning back to in-person learning.
- The existing board staff require appropriate training to mitigate the effects of the pandemic on student mental health and well-being.
- Funding for student programming opportunities would support the recovery from COVID-19, including education programs about vaccination and ways to mitigate anxiety.

Special Education and Closing Learning Gaps

Investment in Special Education and Student Supports will allow for interventions that assist in addressing student learning gaps.

- Adequate investment in student success coaches, tutoring, and summer school.

- Resources (including research-based software), professional development and central support staff to develop gap-closing curriculum (literacy and numeracy) and re-engagement strategies.
- Implementation of evidence based social emotional learning strategies/programs to address socialization/interactive learning loss.
- Additional support staff (i.e. Program Resource Teachers, and Educational Assistants), especially for those students with significant learning needs.
- Adequate support for secondary students returning for a 5th year above their 34 credits.
- Targeted funding must provide long-term stability for staffing and be flexible enough to allow boards to address their local needs, such as allowing for the purchase of services from local agencies where qualified staff cannot be found.

Learning Alternatives / Options

The education sector is optimistically planning for 2021-2022 to be a recovery year from the impacts of COVID-19.

- Approaches that improve student learning, including ubiquitous use of technology, virtual schools, octomester and quadmester systems as alternatives.
- Some approaches are not sustainable at the current funding level and if students are better supported by an alternative approach, then it must be fully funded.
- Investment in the continuation of virtual schools for 2021-2022 would allow for stability.
- A form of hybrid learning or increased access to e-learning programs for the 2021-2022 school year and beyond may be more financially viable. Additional support measures will need to be considered to implement programming and to ensure adequate staffing is available to all boards. A hybrid model requires retrofits to classroom technology such as projectors, sound systems, cameras, software licensing, etc.

Technology / Broadband Internet

To continue supporting students' post-COVID-19 needs, the province must provide on-going advocacy and support for remote learning connectivity and technology.

- In First Nation communities, remote and rural areas it has been a considerable challenge to provide sustainable and reliable connectivity from devices tied to limited cell phone access towers.
- Permanent funding for technology including an increase to the announced PPF amount would support post COVID-19 efforts to replace technology lost on deployment. A temporary replacement of technology will not support the ever-greening efforts of boards beyond 2021-2022. School fundraising has come to a complete halt and will not be able to support the purchase of additional devices at this time.

Ministry Initiatives / Professional Development Days

The Ministry is asked to recognize that board priorities have in many cases been set aside to deal with COVID-19.

- Implementation of new Ministry initiatives will draw focus away from the focus of mental health and wellness and closing the learning gaps.
- Flexibility in professional development day topics that are not mandated by the Ministry to address local and pressing needs would assist the board's efforts.

School Operations / Optimizing Air Quality / Continued Disinfection

Our staff, students and families have come to expect and deserve the same enhanced and high level of school operations, air quality and disinfection in all schools across the province.

- Permanent funding for 2021-2022 will be required to address custodial and maintenance, continued investments in optimizing air quality and HVAC upgrades will always be a contributing factor to the ongoing health and safety of our buildings. The one-time funding allocation for this work was welcome but only allowed for a small portion of the overall work in this area to be completed.

- Funding should also recognize the increase in utility costs as a result of running higher grade filters, portable air purifiers, as well as increased fresh air intake.

Online Learning Adjustment

As announced on November 21, 2019, Ontario students will be required to take two online credits to graduate from secondary school, starting with the cohort of students entering grade 9 in September 2020. As part of this transition, for the 2020–21 school year, the ministry has included an online learning adjustment in the Cost Adjustment and Teacher Qualifications and Experience Grant in recognition of the maximum average class size of 30 for online courses.

Each school board's Online Learning Adjustment amount is based on its percentage of secondary credits taken through online learning in the 2017–18 school year, calculated separately for each category (i.e. day school programs for pupils under 21 years of age, adult day school, continuing education and summer school programs) and a cost adjustment for each category to reflect a funded average class size of 30 for secondary online courses.

As a reminder online courses will not be included in the calculation of a school board's secondary maximum average class size requirement of 23 and remote learning is not considered part of online learning.

Considerations:

- 1. As future adjustments to the funding methodology for online learning courses are to be confirmed through the 2021-22 GSN, do changes and/or adjustments need to be made to the Online Learning Adjustment in order to be more responsive?*

The timing and scale of the implementation of Online Learning Adjustments will dictate how well school boards are able to support students.

- The delay in implementation of funding changes would allow boards to return to a post COVID-19 environment and accumulate new data regarding the uptake of online learning.
- A separate funding adjustment for ongoing software licenses and devices will support all students, regardless of means, engage in distance learning. COVID-19

funding has supported school boards as they procure devices but ongoing funding is needed to support the renewal of these devices.

- Supporting students in need as they navigate online learning is an added concern.
- Connectivity challenges in rural and remote areas must also be addressed.
- Finally, some boards may be disproportionately impacted by the 30:1 class size cap as it will limit course offerings.

Priorities and Partnership Funding

The Priorities and Partnership Fund (PPF) provides education funding, supplemental to the GSN, for high impact initiatives that directly support students in the classroom. The funding is evidence-based and outcome-focused while providing streamlined, accountable, and time limited funding that will be reviewed and assessed by the Ministry of Education each year.

To further support the ministry's efforts to streamline funding while also reducing administrative burden for transfer payment recipients, some programs previously funded through PPF have been transferred into the GSN beginning in 2020–21.

The ministry also implemented a consolidated transfer payment agreement for many PPF programs for the first time. The ministry intends to continue to examine opportunities to consolidate and standardize PPF transfer payment administration, including opportunities for streamlining reporting.

Considerations:

- 1. Are there further opportunities to improve the administration of transfer payment agreements to continue supporting a reduction in administrative burden?*

School Boards appreciate the Ministry of Education investing funding in the form of PPF to support innovation at the local level. We recognize that PPF can serve as a useful tool to fund and evaluate new pilot initiatives on a short-term basis.

A single standardized online reporting platform for PPF could reduce administrative burdens on both the Ministry and boards.

- A single platform will reduce the variability of the current TPA distribution process to ensure that the correct people are notified and receiving the documentation.
- Using an online reporting tool such as SharePoint:
 - confirm funding amounts and terms;
 - specify funding carryover eligibility to facilitate more effective planning by boards and reduce questions to the Ministry; and

- facilitate the timely approval and submission of reports by boards and eliminate the need to report on PPF through EFIS.
- Reporting templates using the common chart of accounts would allow school boards to more easily consolidate the costs. Through COSBO, the engagement of the OASBO Finance Committee can be pursued for feedback on the coordination of PPF reporting.

2. Are there other PPF initiatives that should be transferred to the GSN?

The Ministry has continued to support several initiatives through PPF beyond the pilot phase. When an initiative has proven successful, the Ministry should roll the funding into the GSN in order to facilitate longer term strategic planning by school boards.

- Specialist High Skills Major (SHSM) is funded through both the GSN and a PPF. The program has been funded in this manner for several years. Duplicate reporting through both PPF and the GSN is a non-value-added activity for both the Ministry and school boards.
- Establishing a timeline for rolling PPF into the GSN or discontinuing the initiative would provide a framework and thus predictability for school boards.

3. What potential areas of overlap exist within currently funded programs? What opportunities might there be to streamline funding, and to streamline reporting?

Streamlining Funding

- Provided flexibility for integration and alignment of various PPF into single projects as determined by local circumstances of boards. Larger initiatives may be more impactful when school boards are afforded the opportunity to combine PPF and thus increase the impact of the funding.
- PPF often creates ongoing costs for boards if funding is discontinued. Prior to the issuance of a PPF, consideration should be given to the cost impact to boards and adequate notice of discontinuation of funding would be beneficial.

Streamlining Reporting

- Over reporting, especially qualitative reporting, is more of an administrative task than a meaningful report.
- Annual and consolidated financial reporting on PPF aligned to boards' financial reporting cycles would create efficiencies and effectiveness in the staff workload.
- Streamlining reporting requirements for PPF under a certain dollar threshold would reduce the administrative burden. Certified expenditure statements or attestation regarding compliance with TPAs could replace detailed reporting.

Reducing Administrative Burden and Red Tape

The government is eliminating burdensome, outdated and unnecessary regulation to help restore Ontario's competitiveness, retain high-quality jobs and attract investment.

The Ontario government has taken more than 100 actions to modernize and streamline regulations, reducing overlap with the federal government and municipalities, updating old requirements and simplifying complicated rules.

In 2020-21, the ministry has transferred five Priorities and Partnership Fund (PPF) allocations into the GSN to support the ministry's ongoing efforts to streamline reporting.

The ministry continues to look for ways of reducing administrative burden and aligning program implementation with ministry priorities, while ensuring strong accountability and value for money.

Considerations

- 1. Are there opportunities to reduce the number of non-financial reports and PPF reports school boards currently submit to the ministry?*

There are several opportunities to reduce the number of non-financial reporting and PPF reporting requirements:

- **Eliminating interim financial reports** - Consideration should be given to limit reporting to a planning report at the start of the project and a final report at the conclusion of the project. The timing of the final report should be aligned to the timelines of financial reporting, when costs are finalized.
- **Reducing qualitative reporting** - Consideration should be given to developing a template outlining the qualitative requirements or objectives of the project / initiative and embedding that in the form of an attestation with the submission of the final report.
- **Consistency** – Coordinating the collection and review of reports through a limited number of Ministry staff will promote consistency in school expectations and limit the variance in direction provided by Ministry staff to school boards.

- **Reporting efficiency** - The sector appreciates the ability to collaborate on an Enterprise Resource Planning Request for Proposal. Common platforms will limit the efforts of both the Ministry and school boards as the current reporting processes are largely manual, labour intensive and subject to errors. As a partner in the process, the Ministry will play a critical role in designing a bridge back to EFIS.
- **Capital funding** – The Capital Priorities and Submissions processes are a challenge to school boards given the volume of information required, frequency of reporting, and frequency and timelines of approvals required. Shortening approval process and simplifying the information requirements will enable school boards to utilize the funding sooner and limit the value of the funding from eroding. COSBO looks forward to the recommendations stemming from the LEAN review currently under way and appreciates the Ministry’s efforts to find both areas for improvement and efficiencies in the process.
- **Education Development Charges** - The change to Subsection 195 (1.1) of the Education Act, requiring school boards to seek Minister’s permission to acquire/sell land or lease space has had unintended consequences. This change resulted from the review of O. Reg. 20/98 Education Development Charges, which was targeted to school boards’ need for land or space as a result of growth. However, the changes to Subsection 195 (1.1) of the Education Act were left vague and cause every new lease for space for both existing or new programs, even those funded by the Federal Government or the Ministry of Children, Community and Social Services, to require a comprehensive submission package for review and approval by the Minister. This places a particular challenge when the leased space is from a commercial landlord, in an area of high demand. School Boards could lose the opportunity to secure space for their program and the ability to complete the space in time for course start dates. It also created a significant workload for Ministry staff, and many added briefings for the Minister.

2. *Are there areas of overlap or duplication in the current reports school boards submit to the ministry?*

The number of reporting requirements continues to expand every year, and the benefits of the additional reporting are unclear to the sector.

- A comprehensive review of all EFIS forms should be conducted, with a lens for reducing duplicate data requests, in particular a review of all subsections of Schedule 3, 10 and Appendix H.
- Consideration should be given to data already available through other platforms, (i.e. EFIS, SFIS, VFA, OnSIS) before requesting information from school boards.
- It is difficult and time consuming for boards to upload information in various systems (i.e. EFIS, SFIS, VFA, SISs) and also submit manual reports for many one-time grants. As mentioned in the PPF section above, using a single system to submit all funding reports would create efficiencies for boards. Connections to a single ERP may further benefit school boards and the Ministry.

School Board Administration and Governance Grant

The School Board Administration and Governance Grant (SBAGG) provides funding for administration and governance costs such as operating school board offices and central facilities, board-based staff and expenditures, including supervisory officers and their administrative support.

Amongst other changes, in 2020-21, the Program Leadership Allocation (PLA) was moved from the SBAGG to become its own grant – Program Leadership Grant – as part of a realignment that better delineates funding for the development and delivery of student programming.

The school board administration and governance enveloping provision requires that a school board's net administration and governance expenses in a fiscal year not exceed the administration and governance limit. It is the ministry's expectation that school boards be in compliance with the enveloping provision within SBAGG.

Considerations:

- 1. Are there areas of overlap between this grant and other grants within the current funding formula to support school board administration and governance? Are there opportunities to streamline funding to eliminate duplication and find savings?*

There is not an explicit overlap between SBAGG and other grants contained within the GSN. In many instances, other grants do not recognize the impact on administrative functions within school boards. For example, the provincial and federal COVID-19 funding did not specifically include a component to support the administrative work to implement and report on the work necessary to prepare and operate school boards during the COVID-19 pandemic.

With respect to streamlining funding, moving the Program Leadership Allocation (PLA) from the School Board Administration and Governance Grant (SBAGG) to its own grant was a positive change that realigns these positions with the development and delivery of student programming. Similarly, the Managing Student Information for Student Achievement (MISA) allocation, the Curriculum and Assessment Implementation

Allocation, Capital Planning Capacity Allocation, and the Parent Engagement funding allocation better align with grants outside of SBAGG.

Notably, both the SBAGG formula and the benchmarks contained within have been left unchanged for several years. Since the SBAGG formula was last reviewed, administrative costs have steadily increased due to:

- The increasing complexity and volume of workload associated with labour relations and disability management;
- The increasing complexity and volume of financial reports;
- The increasing use of information technology in the delivery of curriculum;
- The costs of school boards' aging Enterprise Resource Planning systems;
- Aging administration buildings which have limited sources of funding to support their renewal; and
- Legal costs that are associated with human rights claims, all of which substantially stem from schools.

Additionally, the salary benchmarks contained within the SBAGG significantly lag behind industry averages. In particular, the salary benchmarks do not position school boards to remain competitive when recruiting certified professionals in finance, human resources, information technology, planning, and communication. Given the SBAGG enveloping provisions that limit spending on these professionals, a review of these benchmarks will benefit school boards.

Summarily, the SBAGG formula has not kept pace with the growing costs of school board administration and has strained the administration envelope. In reality, there are no savings in this area but rather a pressing need to review the SBAGG formula so that it more accurately aligns with the costs associated with operating a school board.

2. How can compliance with the enveloping provisions of this grant be consistently measured across school boards?

If the Ministry's goal is to ensure school boards consistently adhere to enveloping provisions, then EFIS reporting already measures and reports on compliance with enveloping provisions. If the Ministry's goal is to ensure school boards are effectively and efficiently managed, then compliance with enveloping provisions is not a measure of success. An updated funding model with benchmarks that accurately reflect the current cost of operating a school board will be the next step in ensuring consistent measurement across school boards.

Managing Information for Student Achievement (MISA)

Funding for MISA Local Capacity Building is intended for activities to help school boards build capacity and better manage information and evidence to inform school board decisions around school administration and classroom practice.

MISA funds are used to sustain and advance local capacity to use quality evidence, by targeting funds in at least two of the following four priority funding areas:

- 1. Build and sustain capacity by continuing work on high priority common core activities to achieve/maintain level(s), as set out in the MISA Common Core Capacities Continuum.*
- 2. Create more collaboration at the classroom, school, board, and/or professional network level(s) in activities related to identifying, analysing, implementing, monitoring, and/or evaluating improvement strategies/initiatives.*
- 3. Promote prioritized availability and usability of information for end-users (e.g. teacher, principal, superintendent), while having regard for privacy protection.*
- 4. Data quality management projects that will improve the timeliness, accuracy and completeness of school board data/information submitted through the Ontario School Information System (OnSIS).*

The funding is based on a fixed amount of \$35,000 for each school board and \$0.35 per Average Daily Enrolment (ADE). The MISA Local Capacity Building Allocation is \$3.2 million in 2020–21.

Considerations:

- 1. How can the ministry better support boards in their annual MISA plans and final reporting template submissions?*
 - Creating a forum through which MISA Leads connect with each other to discuss plans before they submit them.
 - Frequent updates from the Ministry to MISA Leads to provide updates on priorities from Ministry perspective and reminders of deadlines.

2. *Boards currently have discretion to utilize MISA funding in alignment with the 4 priority funding areas (above) – how relevant are these priorities areas for boards moving forward?*

- The Effective Evidence Use in the Common Core Capacities Continuum continues to be the primary area of focus for most MISA Leaders. The support MISA Leaders provide in this area supports many stakeholders in the organization, from classroom teachers to administrators and senior teams.
- It is helpful for MISA leaders to be able to use their discretion to utilize the funding to either of the 4 priority funding areas.

3. *Are there other funding priority areas where MISA funds could be directed to maximize impact?*

- MISA Leaders would be a great complement to the Anti-Racism Directorate's work around student and staff census, including collection, analysis, dissemination and ethical use of the data as most MISA Leaders are heavily involved, if not directly responsible, for this work.
- For the 2020-2021 school year, MISA Leaders work includes for the measuring and evaluation of distance learning programs (as per PPM 164). It would be helpful if funds could be used to support this work.

Census Data

The formulas for the GSN allocations that provide funding for specific education priorities include various measures of “need” – that is, they rely on quantitative data to indicate what level of need there is for a particular set of programs and services. Currently, census data is a significant input in the measurement of need. Approximately 14 per cent of total funding for the supplemental grants within the GSN are dependent (all or in part) on census data.

While several allocations within the GSN still rely on 2006 Census data and socio-economic indicators, the ministry continues to review the impacts of updating the census information for the upcoming school year and beyond. Any updates to the census data would require a redistribution of funding between school boards in recognition of increasing needs.

Considerations:

- 1. How should allocations within the GSN be adjusted to reflect updated census data based on the re-distributed impacts to school boards? Should any updates be phased-in? If yes, what is an appropriate phase-in period and why?*

As the census data directly affects funding in a number of allocations that specifically support our most vulnerable learners, the use of up-to-date census data will ensure students are supported appropriately.

- Overall, provincial enrolment has increased and recent data suggests that Canadians are moving away from urban centres. These changes are not reflected in the 2006 census data nor is the existing level of funding sufficient.
- The demographic and social economic factors of the population have also changed significantly across the province, which is not reflected in the Learning Opportunities Grant.
- Dated census data does not reflect the current level of student exceptionalities. The area of special education in particular is underfunded provincially, it is not a

matter of reallocation of funding but a review of funding levels, compared to increasing needs and complexities.

It is possible that updating the GSN to reflect the most recent census data may include some level of redistribution of funding amongst school boards. The phase in of any changes must consider the amount of time school boards need to adapt their level of spending. A three-year phase in of this update will allow school boards to properly evaluate and restructure their operations.

Secondary Class Size Compliance

The Class Size Regulation (O. Reg. 132/12) sets out class size requirements for all grades. In 2015–16, the ministry announced a framework to ensure compliance with the kindergarten and primary (generally grades 1 to 3) provisions of the class size regulation. In 2017–18, this compliance framework was expanded to apply to the junior-intermediate (grades 4 to 8) provisions of the regulation.

The current compliance framework requires boards to submit a class size compliance management plan in the first year of non-compliance. Where a board is non-compliant for two or more years, the ministry will implement reductions in the funding envelope for school board administration and governance. This is effectively a requirement to re-direct funds to the classroom to assist with compliance with the class size regulation. When a school board demonstrates compliance with the limits set out in the relevant sections of the class size regulation, the compliance measures may be lifted.

Considerations:

- 1. What are the benefits and/or challenges of implementing a compliance framework for secondary class size?*

A compliance framework for secondary class size presents more challenges than benefits. Before implementing the framework, school boards need time to assess the impact of mandatory online learning and to adjust for restrictions contained within local collective agreements. Attempting to overlay the elementary framework on the secondary panel is not feasible given the complexities of course selection and pathways. Further, secondary class size compliance, if implemented without proper preparation, could serve to reduce the number of course offerings and by extension, the pathways available to students. School boards must be afforded the autonomy to address their local needs; compliance requirements on caps limit the flexibility of school boards to meet the needs of their students.

Other Recommendations

In addition to the other areas of consultation, COSBO would like to provide recommendations in other areas of the GSN.

Grievances and Arbitrations

At this time the number and costs of grievances and arbitrations associated with decisions made during the pandemic is ultimately unknown to school boards both at a provincial level and at an individual board level. In addition, the time to manage the files, the associated future legal costs are a concern. Although this item has been noted as a medium priority school boards are concerned that these future unforeseen costs may not be affordable on top of the many other cost pressures.

Supply Staffing Costs and Supervision

As school boards continue to accumulate data, the evidence is demonstrating a steadily increasing trend in sick time utilization and failure to fill vacancies. School boards are accommodating a higher-than-normal number of staff experiencing burn-out and fatigue. Notably, a number of staff are not able to be accommodated and therefore can support neither in person nor remote learning. In addition, the cost of supervision monitors due to timetabling, staggering nutrition breaks, and supervising isolation rooms is a cost pressure. An increase in supply teacher funding for the 2020-2021 helped to recognize increasing budget pressures associated with increasing supply staffing costs. A similar increase in funding in the 2021-2022 GSN will further support boards as they address increasing supply and supervision costs.

Technology

The provision of technology for students and staff continues to be an issue for both in person and remote modes of learning. The issue is twofold in that not all school boards have sufficient financial resources to acquire the needed technology and that the supply chain is unable to support the needs of the sector. The following list represents the major concerns brought forward by school boards.

- Available devices – As school boards are compelled to restrict the number of device users for in person classrooms and device sharing is not possible for many remote learners, school boards are experiencing device shortages. Further, school boards have not been able to recover all of the devices deployed in the latter part of the 2019-2020 school year and many devices were returned damaged. These shortages extend to specialized equipment for students with special needs.
- Connectivity in rural and remote areas – Internet connectivity remains an issue for many students and staff, learning and working remotely. Many remote and rural locations have limited options for internet service providers. Further, the number of synchronous minutes required for remote learning makes effective connections for a large families difficult.
- Synchronous learning – School boards do not have sufficient financial resources to outfit our classrooms to simultaneously address in person and remote learners. Projectors, sound fields, and other equipment is costly and in short supply.
- Software licenses – To provide valuable learning opportunities for those student learning remotely Boards are expanding software licenses. Many vendors who offered resources during the Spring shutdown are now charging Boards.

Training New Staff and Mentorship

New teachers are being hired at a rapid pace to address retirements, absenteeism, and additional remote classrooms. The New Teacher Induction Programming funding flows to boards the year after new teachers are hired. Given the number of new teacher hires, the timing difference of the funding, is not benefitting these teachers now.

Mentorship of existing staff, including leadership, continues to be a challenge. School boards are searching for virtual opportunities to mentor and engage staff at all levels. Professional development budgets may have been depleted where school boards are searching for savings. Although challenging, various associations continue to provide opportunities for professional development.

Transportation

Inadequate transportation funding has long been a cost pressure for school boards. This has been exacerbated by the pandemic as boards are incurring additional costs due to midday releases, cleaning costs, and difficulties recruiting and retaining drivers. A further concern will be the sustainability of the transportation network should public health direction cause boards to load busses at less than three students per seat on large buses. COSBO eagerly anticipates the opportunity to provide comment on the recommendations generated by the funding formula review signalled in Memo 2020:SB07.

Concluding Statements

The responses and recommendations articulated in this report are founded in the desire to support publicly funded education in a way that promotes student achievement and well-being, public confidence in a publicly funded education system, and financial sustainability. School boards are experiencing challenges offering both in person and virtual learning options to students, declining enrolment, the current school board administration and governance grant (SBAGG), and the administrative burdens associated with the existing funding model and reporting expectations. The COSBO Budget and Funding Gap Committee looks forward to further conversations and collaboration with the Ministry of Education as we strive to navigate the challenges and uncertainty of the COVID-19 pandemic. In particular, COSBO would like to discuss how it can support a review of the SBAGG.

For reference and as part of this submission, a copy of the November 11, 2020 Report to the Ministry of Education on Budget and Funding related issues will be re-forwarded to the Ministry. The Ministry's response to this report was extremely supportive of school boards but we recognize that we collectively have more work to do on the issues in the report.

Finally, the COSBO Budget and Funding Gap Committee would like to extend its thanks to the COSBO membership for their support compiling this submission and to the Ministry for their continued efforts to engage COSBO in conversations about budget and funding concerns.

Next Steps

In addition to the Ministry of Education, COSBO has distributed this report to the CODE, OASBO and our Trustee Association partners. COSBO would like to express our gratitude for the opportunity to provide input in the Ministry's decision making so that we can collectively continue supporting high levels of student achievement and well-being.