



ONTARIO PUBLIC
SCHOOL BOARDS'
ASSOCIATION

Leading Education's Advocates

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Gabriel F. Sékaly
Assistant Deputy Minister - Financial Policy and Business Division
Ministry of Education
Mowat Block, Queen's Park
900 Bay Street
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Via Email: gabriel.sekaly@ontario.ca

Dear Mr. Sékaly,

Re: Pupil Accommodation Review Guideline (PARG)

Thank you for providing OPSBA the recent opportunity to meet with you and your staff regarding the proposed changes to the Pupil Accommodation Review Guideline (PARG). The slide deck you provided was shared with our senior staff and trustees who belong to our internal working committee, the Policy Development Work Team. It was also shared and discussed with our Executive Council and Board of Directors at last weekend's meetings.

We appreciate that the draft guidelines are responsive to the difficulties we have described in terms of the current ARC process and that they aim to address challenges related to consultation and timeframes. As you know, accommodation decisions are one of the most difficult issues faced by school board trustees. Accommodation reviews have been undertaken with due regard for local circumstances, with thoughtful planning and with meaningful involvement of the community.

While we have a shared interest in releasing an updated guideline sooner rather than later, we are cognizant that December, and particularly this December, is an extremely difficult month for the announcement of new initiatives. All boards have new members beginning their terms and are in the midst of various levels of preparation and orientation. We note that the ministry will be discussing the proposed changes at upcoming Financial Orientation Sessions for Trustees on December 8 and 11. Will the guidelines be identified as draft and subject to further input? We suggest that this release be postponed until the new year.

We suggest that Ministry communications emphasize that the changes to the guideline were made to ensure a primary focus on education and on student achievement and well-being in particular. When the new guideline is released, we would recommend that there be accompanying guidance about the effective date of the new process and a timeframe within which boards would be required to have their policies updated. It would also be important that communications about the revised guideline include a simple Q&A document that addresses the key changes.

Gabriel F. Sékaly

Assistant Deputy Minister - Financial Policy and Business Division

Re: Pupil Accommodation Review Guideline (PARG)

The proposed guideline represents a substantial change in process and, therefore, a comprehensive communications strategy must take this into account. All stakeholders involved – trustees, senior board staff, municipal partners and community members – will need to receive clear communications about the changes and the rationale for these changes, particularly as they affect their past and new role in the process. This would also include parent involvement councils, school councils and principals. Because the issues of school accommodation cross over many sectors, school boards will need the leadership of the Ministry of Education in this implementation to ensure that all stakeholders receive the same messaging. We would, for example, see a role for your Ministry to liaise with the Ministry of Municipal Affairs and Housing to ensure that similar messaging is communicated to municipalities.

Regarding the proposed changes, we offer the following comments:

Role of the Committee:

- OPSBA supports the change that the committee would not be required to vote on recommendations. We agree that it should be the school board who makes these final decisions.

Committee Membership:

- OPSBA supports the clarification that community membership means the parents and guardians from the affected school(s). This makes complete sense as these individuals will be able to offer first-hand knowledge of the building(s) in question. We also support the ability to seek broader community feedback via open meetings and delegations.

Municipal Involvement:

- OPSBA supports a revised guideline that clearly defines roles for our municipal partners and sees them as a key source in the information gathering for any report. Building the background for planning decisions must include consultation between both the school board and municipality staff to ensure that planning is done effectively and with full information on potential developments in the community. We will encourage our member boards to establish and reconnect with their municipal counterparts. We would ask that municipalities are also required to consult with school boards in their planning decisions.
- We appreciate the provision that allows school boards to make their own local decisions about membership, including the consideration of municipal representation.

Timelines:

- For the past several years, OPSBA has voiced the desire for changes to timelines and fully supports the amendments that allow the process to be completed in 5 months rather than 7. We also agree that two well-publicized and communicated meetings are sufficient.

Optional Shortened Process:

- OPSBA members have been advocating for a condensed process, where appropriate. We included this position last year in our submission to the School Board Efficiencies and Modernization Consultation. We would expect that our member boards would identify the appropriate local requirements for such an abbreviated process as we know that the factors being considered (distance, utilization rate, programming) vary by board and geographical region.

Gabriel F. Sékaly
Assistant Deputy Minister - Financial Policy and Business Division
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Reports and School Information Profiles (SIPs)

- OPSBA concurs that the initial report must include information and actions taken (partnership and joint use options) considered by the school board and the inclusion of reasons that explain why certain options were not viable. This adds to the accountability and transparency of school boards.

In addition to the 6 areas of proposed changes, trustees had other PARG related comments to share. These included:

- Reminder that school accommodation decisions (closing or not) are highly emotional for students, staff, parents and the community
- Further reduction in funding does not create an increased motivation for school boards to initiate ARCs, the timelines for ARCs are dictated by the guideline requirements.
- Consideration of the transportation costs for bussing students to a new school as a result of accommodation decisions
- Feedback from the Ministry on how the guideline will align with any direction the government takes on the mandate to support partnerships and community hubs.
- The impact of Ontario Regulation 444/98 Disposition of Surplus Real Property on school accommodation issues and our ongoing advocacy for review of this regulation. For example, in some instances the interest of co-terminus school boards in a surplus property are contingent upon Ministry approval and the Ministry does not have processes established to respond to these situations in accordance with timelines as set out in the current regulation.
- Continued advocacy for a review Ontario Regulation 20/98 Education Development Charges to allow for more creative capital solutions.
- Some municipalities strongly oppose school board decisions to rationalize accommodation through school consolidations or to sever and sell portions of existing school sites to unlock financing for other capital projects. Some of these situations have resulted in challenges at the Ontario Municipal Board which is a significant cost to the school board and delays school consolidations.
- Recognition of the amount of work, time and other resources involved in putting partnerships in place.
- Consideration of the research regarding the connection between student achievement and well-being with size of school.
- The acknowledgement that the ARC process itself costs a significant amount of dollars.

In closing, we agree that an updated guideline is needed. We welcome a process that will help us in meeting our mandate of student achievement and well-being. We would emphasize that communication among the education and municipal sectors is essential to the success of the new guideline. We would be pleased to offer any additional information or clarification regarding the above comments.

Sincerely,



Gail Anderson
Executive Director
Ontario Public School Boards' Association