



ONTARIO PUBLIC
SCHOOL BOARDS'
ASSOCIATION

Leading Education's Advocates

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November 9, 2023

The Honourable Stephen Lecce
Minister of Education

Dear Minister:

The Ontario Public School Boards' Association (OPSBA) would like to thank you for the extension that has allowed us to provide a comprehensive response to the Ministry of Education's 2024-25 Education Funding Consultation Guide and to provide our recommendations for inclusion in next year's Grants for Student Needs (GSN). Our feedback supports our [strategic priorities](#) and includes input from senior staff, alignment with the [Council of Senior Business Officials](#) (COSBO), our member board correspondence, regional meeting discussions, and a review by trustees on our Policy Development Work Group.

This submission follows several other recent regulatory submissions regarding amendments stemming from *The Better Schools and Student Outcomes Act, 2023* (BSSOA). OPSBA's responses to these consultations included funding requests, such as for more trustee professional learning, our ongoing request to lift the moratorium on school closures and release the revised Pupil Accommodation Review Guidelines (PARG), as well as amending the Education Development Charge (EDC) regulation. We note additional BSSOA work is scheduled and we will be responding to the current regulatory proposal regarding Accelerated Apprenticeship Pathways. Our earlier letters include:

- [November 2, 2023](#) – OPSBA Submission to Ontario's Regulatory Registry for postings for the *Better Schools and Student Outcomes Act, 2023*: Director of Education Performance Appraisal
- [October 19, 2023](#) – OPSBA Submission to Ontario's Regulatory Registry for postings for the *Better Schools and Student Outcomes Act, 2023*: Disposition of Surplus Property and Schools on a Shared Site
- [July 6, 2023](#) – OPSBA submission regarding three *Better Schools and Student Outcomes Act, 2023* regulations

Our submission also comes as we continue to recover from the pandemic (even as COVID-19 persists in our communities) and so many of our students and families are struggling. There are many issues colliding at present – mental health concerns, the rising costs of affordable housing and food, serious global conflicts, and increasing polarization in society. These all lead to challenges that are also felt in our schools and classrooms. We all want our schools to be safe

and welcoming environments in which our students can learn and thrive, and our employees can engage in meaningful work.

School boards are funded primarily for providing Kindergarten to Grade 12 education. However, it's important to acknowledge boards have little discretionary funding to direct to unique local needs. Further, while overall funding to the education sector (including childcare) has increased in the provincial budget, funding for K-12 education on a per pupil basis has not kept pace with inflation, let alone the increasing costs arising from a variety of factors that are described in greater detail within this submission. This is not a funding transparency issue; this is a funding adequacy issue.

In addition to our responses to the Consultation Guide and our Areas of Funding Advocacy, we ask the Ministry of Education to consider the following:

- The operational and financial pressures created by inadequately funded short-term sick leave costs continue to be an issue. We ask the ministry to review COSBO's analysis that illustrates the gap between GSN funding for short-term sick leave and the expenditures reported by school boards.
- The GSN must fully reflect the employer costs of federal increases to Canada Pension Plan and Employment Insurance contributions.
- The GSN must address the critical need and increasing costs of cyber security. There were multiple recent cyber-attacks on a public institutions in late October in [Windsor](#) and [Toronto](#).
- School boards are supportive of child care in our schools with most centres (50%+) located in publicly funded schools; yet the capital cost of constructing child care centres must be fully funded to ensure that school boards are not subsidizing child care with the funding allocated to deliver on their mandate under the *Education Act*.
- As boards strive to balance their budgets, they need to remain fiscally responsible and need to manage their reserves appropriately and use their Proceeds of Disposition (POD) monies for Board directed capital priorities, not towards their operational budgets.
- As labour negotiations remain ongoing, we continue to seek agreements that are fully funded.
- All funding decisions must support equity, diversity, inclusion, accessibility (AODA), anti-racism, and anti-oppression commitments and standards.
- The government must respect the critical need for the GSN release date to be timed early enough for boards to staff and plan responsibly.

As a valued and trusted advocate for public education in Ontario, we again thank you for this opportunity to share our feedback and recommendations. Ontario's English public school boards and their trustees are dedicated and committed to improving student achievement and well-being for all students.

Sincerely,



Cathy Abraham
President
Ontario Public School Boards' Association

cc.

Kate Manson-Smith, Deputy Minister (Education)

Andrew Davis, Assistant Deputy Minister (Education)

Dasha Androusenkov, Deputy Director, Stakeholder Relations (Minister's Office)



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OPSBA Submission Regarding the 2024-25 Grants for Student Needs and Education Funding Consultation



OPSBA Submission Regarding the 2024-25 Grants for Student Needs and Education Funding Consultation

Areas of Focus

- Equity, Diversity and Inclusion
- Indigenous Education
- Local School Board Governance
- Mental Health Supports
- Student Transportation
- Skilled Trades and Apprenticeships

Equity, Diversity and Inclusion

The impact and consequences of historical and ongoing marginalization, racism, antisemitism, and other forms of hate, have created systemic barriers that prevent some students from fully participating in Ontario's education system. Ontario's public education system plays a critical role in providing educational leadership and has demonstrated commitment to dismantling structural and institutional systems of oppression by identifying, validating, and tackling barriers in learning and work environments. In addition, the recent strengthening of Holocaust education is an important example of how our education system can ensure that our students develop an understanding of how to identify, respond to, and charge harmful assumptions and stereotypes, antisemitism, and other forms of racism or hate.



To continue building on the ongoing commitment to understanding and addressing the historical and current impacts of systemic racism and discrimination that results in inequities experienced by some students, staff and other members of the educational community, funding must be prioritized for key areas.

OPSBA recommends that:

- The Ministry of Education support school board staff in building expertise in equity auditing, demographic data collection, research, analysis and policy monitoring and evaluation to ensure anti-racism, and equity policy goals that address racism and oppression are implemented successfully. The accountability frameworks related to monitoring and tracking require dedicated funding to ensure continuous improvements for all Ontario students. Deep professional learning is required to combat racism, hate and discrimination in all its forms as we see the rise of hate incidents occurring in Ontario.

- The Ministry of Education invest in the Graduation Coach Program for Black Students to expand it provincially and comprehensively promote it in all publicly funded school boards. The direct supports and mentorship the coaches provide is invaluable in supporting student well-being and achievement.
- That the government publish clear final guidelines on the built environment for the K-12 sector; and provide capital funding to equal that required for school boards to meet these provincially mandated requirements; and work with school boards to ensure compliance with Accessibility for Ontarians with Disabilities (AODA) legislation. Please see [OPSBA's submission to the Fourth Improvement Review of the AODA](#).
- The Ministry of Education commit to responding to the Ontario Human Rights Commission's forthcoming report on tackling anti-black racism in education with targeted funding supports for school boards. Please see [OPSBA's submission to the commission](#).

Indigenous Education

Ontario's English public school boards have the majority of self-identified Indigenous students who attend publicly funded schools. When referring to "Indigenous students," we do so in recognition of the diverse First Nations, Métis, and Inuit nations and communities (on-reserve, off-reserve, status, and non-status) encompassed under the umbrella term of "Indigenous." To support these students and our members, OPSBA established its Indigenous Trustees' Council, which is the primary advisory body on Indigenous Education. Together, we want to develop and strengthen relationships to facilitate access to programs, resources, and supports for Indigenous and non-Indigenous students that reflect the Truth and Reconciliation Commission's [Calls to Action](#). Indigenous education is beneficial to all students, especially as we look to prepare today's students for participation in Ontario's future workplaces and community settings.



Ontario needs to strengthen its role in supporting the revitalization and resurgence of Indigenous languages in this province: an action that is of critical priority. The numbers of Elders, Knowledge Keepers, and Speakers with language knowledge continues to diminish and the numbers of language speakers with teaching certification are even more reduced. Publicly funded schools are regularly experiencing this pressure as it reverberates into challenges that manifest as longstanding language teacher vacancies. We need a properly resourced, actionable strategy that is co-led and informed by Indigenous partners, to train, certify, and retain Indigenous language teachers in schools, and as an overall goal, advances the resurgence of the original languages of this province. Language is synonymous with culture, and both of these things are necessary for Indigenous student success and well-being.

Last year, a Realignment of the Indigenous Education Grant was implemented, much to the concern of our members. Some boards have reported that Indigenous Education initiatives are at risk due to a resulting deficit in funding. Some boards have indicated that the one-time mitigation funding will not be sufficient to stabilize programming, and that additional funding support will be necessary to bridge implementation of the realignment. A significant concern of members centres on accountability. Our members want assurance that funding, which is intended to support Indigenous students and Indigenous Education programming, is

appropriately tracked and regularly reported on with measurable outcomes. Trustees, and Indigenous Trustees specifically, should be engaged through appropriate local processes with an allocation of funding that is specifically intended for Indigenous education purposes. Reporting on how and where funding has been utilized, must be communicated to trustees in clear and accessible formats.

A growing trend has been the addition of Indigenous Trustee and Indigenous Student Trustee roles among our board tables. Having Indigenous voices present at decision-making tables makes a difference and it is important to continue support for advocacy and growth in this area. We thank the Minister of Education for recently supporting our young leaders at our Association's northern conference through funding that covered travel and accommodations. The meeting was very productive and the attending trustees greatly appreciated the opportunity.

Since the launch of the [First Nation, Métis, and Inuit Education Policy Framework](#) in 2007, the ministry has consistently highlighted Indigenous education as a key priority. Improved student achievement and a closing of the gaps in numeracy and literacy, graduation rates, retention, and advancement to postsecondary pursuits were specifically noted. Resources need to be allocated to ensure that progress continues in these areas, as the gaps in achievement levels between Indigenous and non-Indigenous students continue to persist. The ministry should consider supporting Supervised Alternative Learning sites in partner First Nations to advance progress in these areas.



We support a curriculum for all students from Kindergarten to Grade 12 that contains clear expectations that every student will acquire knowledge and understanding of Treaties and of the historical context that gave rise to residential schools, the intergenerational impact on Indigenous children and their families, and the ongoing legacy of reconciliation that is the responsibility of all Canadians. At the same time, it is also important to celebrate Indigenous communities in contemporary contexts, to demonstrate and teach that in spite of the historical trauma, Indigenous communities are still flourishing today.

There are many examples of Ontario curricula that need updating to more respectfully and appropriately reflect Indigenous content and perspectives. Ontario should commit resources to engage in prioritization of curricula for Indigenous content revision. In carrying out these efforts, it is important to respectfully engage Indigenous partners, such as the Indigenous Trustees' Council, in meaningful engagement and consultation throughout curriculum review processes.

OPSBA recommends that:

- The Ministry develops an Indigenous Languages Strategy in partnership with Indigenous education stakeholders that is adequately resourced to address actioning Indigenous Languages Revitalization as a key priority through efforts such as:
 - The training, certification and retention of Indigenous language teachers

- Flexibility for boards to develop innovative alternatives for language funding uses, when unable to fill language teacher vacancies
- Native Languages curriculum review and revision
- Support for advancing innovative approaches, such as the Elders Endorsement Model for Language Circles
- Development of partnerships that advance Indigenous languages revitalization goals
- Continued investment through the Priorities and Partnerships Fund for Indigenous Language Revitalization initiatives.
- The Ministry of Education support Land-Based Learning with resources to support Indigenous spaces in schools, including outdoor spaces for Land-Based Learning.
- The Ministry of Education provide sustainable funding to hire Indigenous Graduation Coaches in all school boards.
- The Ministry of Education provide funding for local school board initiatives that support the transitions experienced by Indigenous students, including, but not limited to:
 - First Nation school to public school (this can occur at various grades, depending on the grade-levels offered by the school that the student is transitioning from)
 - Grade 8 to High School
 - Students moving from school to school (high transiency)
 - Secondary to Post-Secondary
 - Students in Foster Care
 - Re-engagement for students that have left school.
- Strategies be implemented that focus on Indigenous youth participation in the Ministry of Education’s entrepreneurship programs (SHSM, co-ops, apprenticeships, etc.).
- Continued support is provided for Indigenous Education curriculum and resources;
- The Ministry of Education collaborate with other ministries to support parent and community engagement (Ministry of Community and Social Service, Ministry of Indigenous Affairs, etc.).
- The Ministry of Education provide funding for Indigenous Student Trustees to gather together, at the very least on an annual basis, to network and build leadership skills, with mentorship from adult Indigenous trustees.

Local School Board Governance

OPSBA is committed to supporting the role and leadership of local and democratically elected school boards in Ontario’s English public education system. Trustees are the decision-makers that know their communities best. They are the crucial link between the local school board and their communities. This includes the trustees at our member boards, school authorities, treatment centres, student trustees, and Indigenous trustees.



The Association strives to equip every trustee with the tools they need to be excellent board members and leaders. OPSBA has developed a comprehensive suite of learning opportunities designed to support this commitment.

Bill 98, [Better Schools and Student Outcomes Act](#), referred to enabling standardized training requirements for trustees, Directors of Education and other senior board officials. We are supportive of having consistency of messaging for all system leaders but want to ensure we are part of that planning and in the development of new and additional resources.

OPSBA recommends that:

- The Ministry of Education work with school board/trustee associations to co-develop and deliver professional development opportunities that are timely, relevant, and contextualized to the unique role of trustees.
- The Ministry of Education work with school board/trustee associations on a communications strategy that reinforces the important role of local school boards, the importance of trustees' governance role, and the complexities of the role, and responsibilities required of trustees (budget developments, local policy development etc.) to support the diverse needs of students and their families.
- The Ministry of Education support school boards and trustees at the provincial government level with the Premier's office and other ministries, particularly the Ministry of Municipal Affairs and Housing, Children and Community Services and Health.
- The Ministry of Education support a review of the current [professional learning offerings](#) by the [Ontario Education Services Corporation](#) (OESC) – to modernize, update, and increase equitable access of the materials.
- The Ministry of Education provide regular and consistent Professional Development opportunities for school board chairs, vice-chairs, Directors of Education and other senior board leaders.

Mental Health Supports

OPSBA continues to support the implementation of a comprehensive and coordinated mental health and addictions strategy. With long-standing data indicating that approximately one in five children and youth in Ontario have a mental health challenge, early investments in school-based mental health and addictions services will yield long-term benefits for the health care system and the wellness of students and future generations.



Currently, due to the circumstances surrounding COVID-19, the prevalence of mental health issues among students and staff has risen significantly.

These realities necessitate the development of a staged three-to-five-year strategic Grants for Student Needs based funding plan to support school boards, schools, educators, students, parents/guardians, and families as they transition from the COVID-19 school experience. From a healthy classroom perspective there has never been more evidence to support the compelling need to balance and integrate curricular and mental health and well-being expectations into every classroom. School transformation over the next five-to-10 years must incorporate this as a critical underpinning. Although the primary responsibility resides with the



Ministry of Education, inter-ministerial collaboration is essential to remedy a fractured and significantly underfunded continuum of care.

Mental health and equitable student outcomes are inextricably linked. A strong pre-condition for all school-based mental health services are school boards and schools that operate through an anti-racism and anti-oppressive stance. It is important to ensure that interventions are culturally responsive or can be transformed to meet the needs of the students served. For this work to be effectively incorporated into daily practice, there must be training and resources for all staff, which will require funding and resource development.

All of the recommendations below reflect long-standing mental health and well-being needs at the school, system, and community level, which were exacerbated during the pandemic, raising concerns over a longer-term impact. There needs to be a collective understanding that mental health and well-being requires a sustained predictable commitment of government funding to effectively address the increased need for supports and services for students, staff, and families for the foreseeable future.

The recent position paper by the Ontario Coalition for Children and Youth Mental Health, [Let's Put our Heads Together](#), provides the evidence-based research that supports all of the following education-focused recommendations.

OPSBA recommends that:

- The ministry continue to annually increase the funding for School Mental Health Ontario's (SMHO) infrastructure to reflect current system needs and long-term sustainability.
- The ministry/government commit to ongoing investment in policies and programs that increase access to culturally appropriate, identity-affirming, anti-oppressive, and inclusive mental health supports and services for children and youth across Ontario.

- The Grade 7/8 mental health modules be expanded to include a K-12 Comprehensive mental health strategy.
- The ministry/government commit to sustained funding of the Ontario Child Health Survey, and in collaboration with research partners, increase the frequency of the survey's administration (for example, on a five-year cycle).
- The equivalent funding of a full-time position be implemented in all 72 school boards for each of the next three years for a designated School Board Staff Mental Health Lead to coordinate with the student mental health lead in support of healthy classrooms.
- Professional learning, training and provincial coordination be integral to support this position (*see rationale in Appendix A).
- The ministry/government work with all system partners to pilot implementation of the system of care described in [*Right time, right care: Strengthening Ontario's mental health and addictions system of care for children and young people*](#) (School and Community System of Care Collaborative, 2022).
- There be a continued focus on expanding school-based resources, supports and services (e.g., mental health promotion, early identification, prevention and intervention) for children, youth and their families.
- Funding be prioritized to support sustained, ongoing, incremental, iterative professional development opportunities (e.g., job-embedded approaches, a coaching model) to eliminate the negative schooling outcomes associated with all forms of historic systemic discrimination. This is a precondition for culturally responsive, identity-affirming mental health support.
- There be a continued increase in the number of school-based mental health professionals (social workers, psychologists, guidance counsellors, child and youth workers, and school mental health workers) to address the significant increase in the number and severity of students requiring support.
- There be a continued increase in community agency supports and services to eliminate wait lists for sufficient and timely pathways to care across the province, especially in northern, remote, and rural areas.
- There be investment in a coordinated system of care that includes community mental health, public health, hospitals, and cultural/faith partners that has students and families at the centre, ensuring that community mental health centres focus primarily on intensive services and are staffed sufficiently for this role.
- A focus on mental health supports for transitional youth is ensured, especially youth transitioning to post-secondary settings, with an even greater focus in this area due to the pandemic.
- Additional resources for attendance counsellor support and credit recovery/rescue support be provided, especially to reengage students and families as a result of remote learning and COVID-19 as indicated through the increase in home schooling.
- The provincial government strongly advocate to the federal government for mental health supports and services in First Nations band-operated schools, proportional to supports available in provincially funded schools.
- Careers in the mental health sector be marketed to students.
- Pre-service teacher programs include mental health and well-being learning that is aligned with School Mental Health Ontario resources/supports being delivered in Ontario school boards.

Student Transportation

The Student Transportation Grant is meant to provide school boards with funding to transport students to and from home and school, including students with special needs. However, it can also include transport for school field trips, sporting events, other extracurricular activities, experiential learning such as cooperative education, and perhaps additional service for before-and-after school care. This requires a coordinated effort often involving partners including other school boards, different school bus operators, separate consortia, and in many instances, school boards working with their municipalities' local public transit.

Last year, the Ministry of Education made changes to the grant formula for student transportation that, if left unchanged, will lead to significant negative impacts, including growing transportation deficits and a widening gap between family expectations and school boards' ability to provide transportation service to families. One issue that has resonated with many boards is the elimination of funding for smaller special purpose vehicles (such as minivans) that transport students with special and/or high needs to and from specialized programs (including arts programs). It was noted that these highly used vehicles are often the best option to transport students who have accessibility or accommodation needs. Another issue that has been shared with us is that drivers not being fully or adequately compensated for their time.



There are other outstanding issues and concerns that remain and these include:

- Driver shortages and route cancellations
- Driver attraction and retention (due to compensation, few hours, split shifts)
- Bus safety
- Increased fuel and maintenance costs that are in excess of ministry-funded levels

The updated funding formula does not reflect the actual cost of transporting students. School boards acknowledge that they are responsible for negotiating contracts with bus operators (through their consortia) in good faith, but the reality is these external partners are sensitive to inflationary pressures, and with very limited school bus manufacturing capacity in Canada, subject to foreign currency pressures as well. The result is contracts that cannot be procured within the ministry-funded rates. This has led to boards facing immense funding pressures and budget deficits in this area. It should be noted that our northern boards (rural and remote) face additional challenges including the length of routes, extreme temperatures, and the costs of ground and air transportation for Indigenous students from remote northern communities who attend public schools in urban communities.

OPSBA recommends that:

- The Ministry of Education consult with school board/trustee associations and COSBO to address these urgent needs and provide boards with the additional funding to eliminate deficits in this area.
- The Ministry of Education implement an updated framework that uses a needs-based approach and benchmarks that reflect the true costs of providing student transportation, including the recognition of inflationary increases.
- The Ministry of Education commit to the investment of increased funding to attract and retain school bus drivers.
- The Ministry of Education staff work with its municipal counterparts on joint initiatives to support students (i.e. [TTC](#) offers free rides for children under the age of 12, City of Kingston [High School Student Transit Pass.](#))

Skilled Trades and Apprenticeships

OPSBA applauds the government's recent efforts to promote the skilled trades and apprenticeships for students in school settings, however OPSBA does not support adding a new accelerated apprenticeship pathway for Grade 11 and 12 students.

OPSBA would like to see even more focus at the provincial and local elementary and secondary school level to help students and their families develop positive attitudes toward the trades and for students to be provided with more "hands on" and experiential learning opportunities. An apprenticeship focus can easily be expanded and integrated into existing secondary school programs and through secondary school experiential and cooperative education programs, specifically the Ontario Youth Apprenticeship Program (OYAP) and Specialist High Skills Majors (SHSM). This will involve balancing and/or shifting funding levels for commencing an apprenticeship to secondary schools rather than only in post-secondary and employment settings.

OPSBA recommends that:

- Funding and placements for the OYAP, SHSM and Cooperative Education programs be expanded, and that the government expand relevant opportunities for students to begin to earn apprenticeship hours while in secondary school.
- The lack of skilled trades' education and apprenticeship options for Indigenous students in Indigenous communities be addressed.
- Appropriate funding to ensure equity of access to work placements including transportation costs especially in rural, remote and northern communities be incorporated.



- Dedicated funding for renovations in secondary school facilities and new construction to provide shop programs to support careers in the skilled trades (Grades 7 to 12) be provided.
- Amendments that will change the journey person to apprentice ratio for all trades to increase student access to these career opportunities be supported.
- Targeted marketing and communications, specifically directed at parents, students, educators and employers, to further elevate skilled trades to a respected and desirable pathway be continued.
- The Pre-apprenticeship Training Program for secondary school graduates and 18-year-olds who are looking to reengage in their education through skilled trades be expanded and promoted.

On the following pages, you will find *Appendix A: School Board Staff Mental Health Lead Rationale*, as well as our responses to the Ministry of Education's Funding Consultation Guide.

As a valued and trusted advocate for public education in Ontario, we again thank you for this opportunity to share our feedback and recommendations. Ontario's English public school boards and their trustees are dedicated and committed to improving student achievement and well-being for all students.

Appendix A *

School Board Staff Mental Health Lead Rationale

In 2011-12, OPSBA proposed the staged implementation of school board mental health leads to support students in all 72 school boards. In conjunction with the leadership of School Mental Health Ontario, this successful strategy has been integral to creating coordinated school board and provincial mental health action plans, development of evidence-based resources, building staff capacity over time and facilitating key community connections.

Mentally healthy students are directly linked to mentally healthy school and board staff. Given the stressors linked to supporting students during the pandemic, there is an identified need to replicate this successful model by creating a similar position that designates a School Board Staff Mental Health Lead to support staff. Although an Employee Assistance Program (EAP) is a helpful staff resource, this position by comparison is designed as a proactive strategy to build capacity for healthy classrooms. Ideally, this Lead position would be a registered health professional with defined areas of competence related to adult mental health and workplace mental health.

Over the last number of years there have been many requests of the student mental health leads to support staff mental health, which is inconsistent with the original intent of the role and diverts key resources/supports away from escalating student-based mental health needs. Given the current realities related to staff mental health, it is recommended that the equivalent funding of a full-time position be implemented in all 72 school boards for each of the next three years. This staff mental health lead position would directly champion the priority of staff mental health, and work in tandem with the student mental health lead to coordinate, align and implement strategies and practices to build, maintain and sustain healthy classroom environments for students and staff. This dual-pronged approach will lead to improved, sustainable outcomes for both students and staff.

Implementing this strategy will demonstrate the incredible value that we collectively place on school and board staff. It will intentionally promote the inclusive and productive learning and teaching environments needed for all members of the school community to thrive. OPSBA would be pleased to be part of an education partner working group to further develop this strategy.

Ministry of Education Funding Consultation Guide

The Ministry of Education has released the [2024-25 Education Funding Guide](#) which includes two areas of focus:

- 1) Strengthening Accountability; enhancing transparency and reducing complexity
- 2) Modernization of the Special Education Grant.

1) STRENGTHENING ACCOUNTABILITY AND ENHANCING TRANSPARENCY

1. What reforms can be made to the GSN funding formula to:
 - i. reduce its complexity?

With education funding now over \$27 billion, amounts are significant and allocation methodology is complex. It would be beneficial if the Ministry of Education published all formulas and related inputs so that stakeholders might better understand. There are many “notional” amounts even in the technical paper. For example, funded benefit benchmarks are stated as a combined percentage of salary. A breakdown would clarify which benefits were included and at what amounts/rates, both reducing complexity and enhancing transparency.

- ii. enhance the transparency on how school board funding is used?

School boards are regularly required to attest, submit reports, provide information informally and formally to regional offices and the ministry, all to demonstrate accountability and transparency. School boards are subject to an external financial audit, as well as internal audits of operational areas. Senior staff provide regular updates at public board meetings throughout the year, and reporting is available on all school board websites and therefore available to the public.

The Ministry of Education should consider funding an Enterprise Resource Planning software package for school boards so that all can use the same financial platform. This could result in greater standardization and efficiency in maintaining and reporting expenditures.

2. What opportunities are there to strengthen accountability while balancing administrative requirements?

As noted previously, school boards are regularly required to attest, submit reports, provide information informally and formally to regional offices and the ministry, all to demonstrate accountability and transparency. School boards are subject to an external financial audit, as well as internal audits of operational areas. Reporting is available on all Board websites and therefore available to the public.

If there are systemic concerns about specific areas of reporting, consultation should take place with school board staff and stakeholders to provide recommendations on how to best address those specific areas. School boards can provide input on the amount of funding required to implement recommendations.

3. What opportunities exist to better communicate to taxpayers:
 - i. how GSN funding is allocated to school boards?

Education Funding in Ontario is extremely complex with many different funding formulae for specific areas within the system. While many people may be aware of the larger grants (i.e. Special Education and Transportation), there is confusion and often misinformation as to how school boards are actually funded, the variety and rationale for the many grants, as well as the restrictions that are attached to funding envelopes.

Further, because of its technical nature, the use of an incredible number of acronyms, and “EDU-Speak” language, education funding details and particulars tend to be discussed primarily among senior business officials and senior board staff. Trustees are, of course, provided with relevant and important information in order to make policy decisions and balance budgets based on staff recommendations.

The Ministry of Education does provide and post funding memos and a Technical Paper, but these are not typically shared or communicated beyond those directly associated with or connected to the education sector. School boards also share information with their school communities, but it can be difficult to provide comprehensive background information and rationale for funding related decisions.*

In addition, the overall budget process and cycle (both at a government level and school board level) is not widely known outside of the education sector. Students, parents and guardians would have access to information, but more can be done to explain and communicate more comprehensibly with greater frequency. We note there is information for parents posted on the [ministry’s website](#), but we are not aware of how useful it is or how often it is visited.

OPSBA has discussed offering Professional Development workshops for trustees, both new and veteran, on how to explain education funding to their constituents. Resources and tools could be developed for broader audiences, not just “taxpayers.” This could extend to sharing with municipal counterparts and even Members of Provincial Parliament. (Note: our trustees have met with stakeholders who also did not fully comprehend how education funding worked.)

**The Technical Paper includes 17 different grants. Education Funding also includes the Priorities and Partnerships Funding (PPF).*

OPSBA recommends that:

- *The Ministry of Education work with school board/trustee associations to develop resources to help with the communications regarding education funding.*
- *The Ministry of Education and school boards endeavor to provide education funding information in multiple formats that are easy to understand and accessible.*

ii. *how school boards use GSN funding in alignment with government priorities?*

OPSBA recommends that:

- *When the Ministry of Education announces the GSN, the memos and supporting information clearly state the alignment of funding decisions to these areas of priorities. School boards can then share and communicate their specific funding allotments that support their local programs that are connected to government priorities.*

Additional OPSBA recommendations and considerations:

- *We would also like to make mention of the timing of certain funding announcements that do not align with school board budget or staffing cycles. For example, the ministry*

changed the Indigenous Education funding formula and informed the sector that more information would be shared at a later date, but left boards to make local decisions, including staffing, without details or ministry direction, as to how the funding was to be used.

- *Ministry communications (news releases and B memos) clearly state and distinguish between one-time funding and ongoing funding.*
- *Ministry communications (B and SB memos) outline the broad criteria for the use of the fund, including any restrictions.*
- *Post-GSN announcements need to clarify if the funding mentioned was part of the earlier GSN package or if it is new and additional funding.*
- *The ministry should develop communication materials for specific audiences (i.e. trustees, school board staff, parents, etc.).*

2) SPECIAL EDUCATION GRANT – SPECIAL INCIDENCE PORTION (SIP) AND SPECIAL EQUIPMENT AMOUNT (SEA)

On April 17, 2023, the Ministry of Education announced that a modernization review of key components of the Special Education Grant (SEG) was being undertaken. During the 2023-24 school year the ministry will conduct a review of the Special Incidence Portion (SIP) and Special Equipment Amount (SEA) allocations. This review seeks to improve the SIP and SEA allocations by streamlining processes, reducing administrative burden and continuing to meet student needs.

The review presents an important opportunity to transform the way funding is allocated and used and to ensure that supports on the ground are more closely aligned with student needs and our goals for student achievement through a modern process that is accountable and transparent. In addition, it will provide an opportunity to evaluate the existing allocation models, to assess student needs and outcomes, and to develop solutions that will address issues and inefficiencies that are identified.

Considerations:

What reforms can be made to SIP and SEA to:

- Reduce administrative burden and streamline processes?
- Recognize the complexity of student needs across the different special education delivery models (example: self-contained classroom setting versus fully integrated setting)?
- Ensure the allocations are meeting their intended purpose?
- Support flexibility to meet local priorities?

Feedback from School Board Staff

SEA and SIP are based on an old model of reporting and the associated funding does not adequately reflect the new realities of student needs, early intervention strategies, current costs and access to community supports and services. Local context and flexibility for school boards to design supportive learning environments, in conjunction with students and their family, needs to be strongly factored into the SEA/SIP procedures, processes and funding.

SEA and SIP processes and paperwork continue to be significantly time consuming and can take upwards of eight to 10 hours per student application. In most school boards there are no dedicated staff that have this sole responsibility and as such it takes vital service hours away from the students who require this level of support. This process impacts teachers, educational

assistants, resource staff and school administrators. Consideration should be given to funding a staffing position for this purpose.

The COVID-19 pandemic surfaced many issues regarding access to, and the lack of, sufficient numbers of family physicians and paraprofessionals, specialized services and supports. As a result, the ability to access the required reports for Occupational Therapy (OT), speech, autism and pediatric and other areas is significantly compromised and, in some cases becomes a barrier to completing the applications to access necessary funding. This further creates inequities in classroom and school settings for these students. Although accessing timely clinical reports for submissions is extremely challenging, this issue is especially true for Occupational Therapy (OT), requiring a letter of support, where there are long waitlists of up to two to three years for students with sensory needs. These students are having to wait a very long time to receive support and have equipment recommended. Although OT and other types of waitlists are not in the purview of the Ministry of Education, OPSBA asks for assistance in advocating for increased staffing for MCCSS-funded partners.

Strong consideration should be given to the staffing infrastructure (FTE) funded through SEA and to look at re-purposing to hire a board-based occupational therapist; there is a level of risk for school boards and the Ministry of Education to not have supporting documentation from an OT for equipment related to sensory.

It is important to note that the type of classroom placement does not denote complexity. Regardless of model/setting, school boards still need to meet student needs. Boards that use a full integration model seem to be at a disadvantage regarding the amount of money they receive through SIP. When calculating funding, the formula used takes into consideration the number of students and adults in the class. This would result in a difference if there are 28 students (in a regular classroom) compared to eight in a class (in a self-contained classroom). Students with the lowest adult-to-student ratio meet the SIP criteria (e.g., three adults and eight students) while a student in a regular class supported with three adults and 28 students may not.

Some suggestions that have been provided include:

- Providing an increased base funding allocation to school boards for SEA plus an opportunity to expand the amount to address local/regional context and prevalence issues. This is especially true in northern, rural and remote communities.
- SEA funding needs to be reviewed to reflect up to date costs of equipment and technology.
- The amount of funding generated from a SIP file needs to generate the full cost of salary and benefits. Adjust the benchmark salary to more accurately reflect costs.
- Review and consider denotation of certain categories.
- Reporting on Appendix 1 could be improved (where student information, equipment ordered, price, etc., for claims over \$800 are entered). It is suggested that it follows the same model for PPA funds, which is reported on Appendix 2. This could help to streamline the process and potentially reduce office/clerical support.
- Creating a live portal, open all year, to enter and track students over the course of the year by their student number. This would help to identify students who transition between school boards and help to move the dollar allocations in a timely way, taking into consideration the timing of board staffing processes that are determined by Collective Agreements. This portal would hopefully prevent annual applications for the same student and simply allow for any additional information to be added or changed.

Any portal that is created needs to be user-friendly, with confidentiality and privacy considerations being paramount.

- Establish transition funding to allow for movement of students between and among boards would be helpful. In addition, a process to ensure that specialized student-specific equipment is forwarded along with the student would save time and duplication of expenditures.
- Consider supporting residential or alternative time-bound settings specifically for students with intensive needs to better understand and create in-school supports, learning plans and access to appropriate services for students and their families. Very few organizations/agencies will accept students with complexities beyond the scope of education; boards have no options so may use SIP funding to support. SIP is not the answer as there is no flexibility with staffing. Waitlists also inhibit the ability for community response in a timely fashion.
- Although educational assistants are a valuable resource, funding flexibility should be given to school boards to hire the best staff support possible to meet a student's needs, such as a child and youth worker, occupational therapist etc.
- Consider using SEA to explore and trial emerging/innovative technologies that could better meet student needs and close gaps, and not just maintain the status quo of current technologies – e.g.: [Canadian company named to Time Magazine's list of greatest inventions of 2023](#)

Special Education

Special Education continues to be an area that is underfunded given the prevalence and complexity of student needs. This is even more significant where community services and supports are not readily available or easily accessible. This was highlighted and exacerbated during the COVID-19 pandemic. These students now potentially have even more significant learning gaps that need to be intentionally addressed.

OPSBA recommends:

- Predictable and responsive funding that reflects the ongoing specialized needs of students who require Special Education supports and/or services.
- Continued review of the Special Education grant components to ensure they are reflective of the current school board realities.
- A comprehensive review to fully understand the issue of assessment wait times, gaps in services, and access to professional staff across the province in order to provide timely and relevant supports to students and their families. This continues to be more acute in northern, rural, and remote communities.
- That Special Education and specifically autism supports and services continue to be reviewed and revised to meet student and family needs, especially as it relates to the impact of COVID-19 on learning and well-being.
- Predictable and stable funding to ensure that all learning spaces, educational equipment and teaching practices are fully accessible, under the *Accessibility for Ontarians with Disabilities Act* and associated regulations under the Act, for all students to engage and thrive in all aspects of school.
- Continued support for the valuable contributions that our school treatment centres offer to students and their families, and for locally seconded staff.



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