



**ONTARIO PUBLIC
SCHOOL BOARDS'
ASSOCIATION**

Leading Education's Advocates

Ontario Public School Boards' Association

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Marg Connor,
Director,
Safe Schools and Student Well-Being Branch

OPSBA feedback regarding Draft PPM – Concussion Prevention, Identification and Management

The Ontario Public School Boards' Association (OPSBA) represents the province's 31 public district school boards. Together our members serve the educational needs of almost 70% of Ontario's elementary and secondary students. In addition to advocacy on behalf of Ontario students, our Association provides services to school boards and to school trustees who are elected to public office through Municipal elections or are appointed as First Nation trustees. We are an organization that has a strong history of advocacy for student achievement and well-being and take pride in the contributions we have made to the shaping of education policy in Ontario.

We had followed the concussion dialogue when it was presented in Bill 39, *The Education Amendment Act (Concussions) 2012*. Although the bill was terminated via prorogation, it led to conversations among school board trustees who are responsible for both student achievement and well-being. We agreed at that time, and still do, that schools and school boards can play a proactive role in the education of brain injuries and concussions. We have always felt that teachers, coaches, administrators and other staff need to be provided with regular training and that this must be enabled by government funding. Our teachers, principals and school staff continue to be asked to be aware of serious issues (mental health, bullying, etc.). We strongly request that support be given for these additional responsibilities. Our Association held a session at our 2012 Public Education Symposium called, "Concussions: The Impact on Students." In addition, many boards have hosted concussion conferences.

With regards to this draft PPM, we offer the following comments:

- We support the concept that the school board policy should be shared with other organizations that use the school facilities (community sports groups and licensed child care providers, etc.).
- We recommend extending the use of OPHEA's safety guidelines to a wider audience, including community-based organizations.
- Some school boards have concussion/brain injury policies and/or procedures. It would be helpful if the ministry provided a generic template for boards to then work with their local board of health in the final development and implementation of their concussion policy. As this is to be in place for next September, it would be helpful to have this as soon as possible.
- Under the section "Management Procedures for a Diagnosed Concussion", the document refers to "the development of an individualized and gradual return to learn/return to physical activity plan for every student with a diagnosed concussion." We suggest the

ministry provide examples of such a plan and provide training to teachers/principals about how to construct such a plan.

- We suggest that more recognition be placed on the fact that teachers/coaches etc. are not medical professionals making diagnoses. As adults on the front line, their obligation would be to follow procedures for suspected injuries.
- We suggest the PPM include information regarding second and subsequent impact syndrome.
- We would include more description about the variable nature of concussions (i.e. not always during school hours) and the unpredictable course of recovery (exempt from classes, homework adjustments). Students will require a variety of supports upon their return and some of these may require changes at the school level (i.e. funding of “quiet” areas). Students may also require other programming modifications, i.e. additional support with math processing.
- We would ask for clarification about what the ministry might suggest with regards to payments for any clinical assessments. It is our understanding that reports from doctors can cost approximately \$40 and we don’t believe these should be paid by parents.
- We strongly urge inter-ministerial support and action to increase information sharing among schools, sports leagues, doctors, etc. This would include possible legislation changes and discussion about privacy issues, medical waivers, etc. Gaps in communications make identification and management extremely difficult.
- We support the need for ongoing training for our teachers, coaches and principals. We believe a concerted part of this training should include how to support students returning to learn/play and not rush back to normal pre-concussed routines.

Our members also discussed the issue of providing safe playgrounds and play structures which are used both during school hours and after hours. Members also expressed the need for effective information sharing and communications between the school and other organizations and licensed child care providers operating in the school.

Thank you for your consideration of these comments in the drafting of this PPM. We look forward to hearing about next steps for communication and distribution.

Sincerely,

A handwritten signature in black ink that reads "Michael Barrett". The signature is written in a cursive style with a horizontal line extending to the right.

Michael Barrett
President
Ontario Public School Boards' Association