



ONTARIO PUBLIC  
SCHOOL BOARDS'  
ASSOCIATION

**Leading Education's Advocates**

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To: The Honourable Stephen Lecce  
Minister of Education

Re: OPSBA Submission to Ontario's Regulatory Registry posting of *Bill 98, Better Schools and Student Outcomes Act, 2023* supporting regulations:

- Provincial Priorities on Student Achievement,
- Professional Activity Day Transparency; and
- Consequential Regulation Amendment: Transitional Certificate

The Ontario Public School Boards' Association (OPSBA) appreciates the opportunity to respond to the Ministry of Education's consultation for the initial priority regulations stemming from *Bill 98, Better Schools and Student Outcomes Act, 2023*. OPSBA actively engaged in consultation with its membership as the bill moved through the legislative process. Our feedback was shared at the public hearings and in our written submission. For these regulatory postings, OPSBA sought input from our senior staff as well as our Education Program and Policy Development Work Groups, which have representative trustees from every region in the province.

Our comments and outstanding questions can be found below for each of the three regulations.

**Provincial Priorities - Student Achievement**

- We support education-related priorities focused on student achievement and well-being and school boards having the ability to set local priorities in addition to provincial priorities.
- Although we agree that these provincial priorities should be reviewed at least every three years, it is recommended that there be flexibility to regularly review and make changes as required based on local context.
- We agree that the system-wide performance indicators should not be included in a regulation, but be part of a board's Student Achievement Plan (SAP).
- In addition, school boards should be given the opportunity to determine a range of quantitative and qualitative indicators to demonstrate progress toward established priorities regarding student achievement and well-being.
- The SAP tool is not yet available to school boards for planning purposes. The regulation closing date is July 12, which leaves little planning time should there be a significant change in format/requirements for school board administration and communicating with trustees and school communities. Therefore, the government should consider making allowances for this year's transition period so that school boards have a fair chance to implement the new direction and fully comply with the regulation.
- The provincial SAP tool needs to allow boards to consider disaggregated achievement data and apply different strategies for improving results for different groups (i.e., the groups identified as having disparities/disproportionalities through the application of identity-based data to achievement data).

- It is unclear whether a new set of provincial priorities will be established each year, or whether the priorities identified will be expected to be achieved within the three years of a multi-year plan.
- Boards' annual planning typically relies on analysis of the previous year's data, which will not be completely known until some time after the start of the school year. The engagement with parents within the first two months of the school year therefore may be too soon for boards to be able to share up-to-date information.
- We believe student success is personal and unique to an individual student. For the priority around Student Engagement & Well-Being, there must be indicators that are qualitative as well. The indicators of student attendance and suspension rates are good, but we know that they are not the only indicators of engagement and well-being. [Right Time Right Care](#) is a document that was collaboratively developed and supported by education partners and outlines a coordinated system that supports students affirming their identities. It defines the connection between affirmed identities and mental health and student success and draws on informed approaches that promote mental health literacy in schools, which should also be used as indicators to support student engagement in safe and supportive learning environments.

### **Professional Activity (PA) Day Transparency**

- This proposed change is to be effective for the 2023-24 school year. The regulation closing date July 12 leaves little planning time for school board administration and communicating with trustees and school communities. It is recommended that the Ministry of Education consider a phased-in process with full implementation for the 2024-25 school year.
- We would like more clarity to confirm that the intent is to continue the current practice of providing high level details using the Ontario School Year Calendar (OSYC) submission process and then provide additional and more specific details closer to each PA Day.
- More importantly and of greater concern is the requirement to post such detailed information. Although the professional learning topic may be consistent across a school board, the content and approach for each school and panel will vary.
- The collection of the information identified in the draft regulation would require a significant amount of time and administrative work for the board and each and every school. Some member boards have hundreds of schools that would need this information posted. For example, the TDSB has 500+ schools. As a result, it is recommended that only high-level content and topic(s) be posted.
- In addition, the challenges of safety and security that are now necessary at some public meetings is of concern of late. This challenge could be extended to the promotion of PA Day presentations and topics. Because of this, we again recommend only a high-level summary should be posted in advance. For the safety and security of presenters, they should be asked for their permission to have their names posted.
- A standard template or online form for posting this type of information would be welcomed.
- It is important that the regulation and any reporting template are clear that these days may be used for professional activities and/or professional development (learning) activities. For example, some elementary PA days are used for preparation of report cards, parent/teacher interviews, etc. as a result of collective agreement obligations.

### **Consequential Regulation Amendment: Transitional Certificate for Eligible Teacher Candidates**

- There is no implementation date noted for this new certificate but it is implied that it would be in place once the current process expires on December 31, 2023.
- We are confirming that the regulation is exclusively for daily Occasional Teacher hires.
- We are very concerned regarding the amount of “due diligence” time required to screen and provide ongoing support for these transitional certificate teachers. This will require increased time and effort for those supervising the teacher candidates.
- At this time, it is unclear as to the certification requirements including the number of required faculty of education Initial Teacher Education (ITE) courses and the number of practicum days, which is directly linked to candidate “readiness.” Any significant reduction in the existing Ontario College of Teachers (OCT) requirements/regulation will be of concern.

- There needs to be recognition (funding) of the support these “pre-service” teachers will require along with the time and personnel to provide these supports; specifically, there must be recognition that the candidates will require an increased amount of supervision and guidance to support planning of lessons, delivery of program, assessment and evaluation of student learning beyond a daily occasional teacher role.
- Will there be any changes to New Teacher Induction Program (NTIP) requirements as a result?
- School boards would need clarification that the faculties of education would maintain the responsibility of ensuring OCT professional standards and advisories are part of their initial teacher education training programs (i.e. advisories re: duty to report, electronic communication and social media, anti-Black racism, professional boundaries, sexual misconduct, responding to bullying, mental health, etc.) There is concern that without a specific plan on how this information is being provided, there would be a gap in implementation for candidates transitioning to employment while being in front of students and these important accountability mechanisms would not be suitably addressed.

We thank you for engaging the sector on these priority regulations. It is always important to seek expertise and valuable on-the-ground experiences in the delivery of public education across the province. School boards and trustees bring relevant local knowledge and understanding of the important community issues that can make methods of teaching and learning more relevant for students and parents. We look forward to learning about next steps and how we can work together to achieve a successful implementation.

Sincerely,



Cathy Abraham  
 President  
 Ontario Public School Boards' Association

cc.

Kate Manson-Smith, Deputy Minister, Education  
 Phil Graham, Assistant Deputy Minister, Strategic Policy & Planning Division, Education  
 Dasha Androusenkov, Director, Stakeholder Relations, Minister's Office

The Ontario Public School Boards' Association represents English public district school boards and public school authorities across Ontario, which together serve more than 1.3 million public elementary and secondary students. The Association advocates on behalf of the best interests and needs of the public school system in Ontario. OPSBA is seen as the credible voice of public education in Ontario and is routinely called on by the provincial government for input and advice on legislation and the impact of government policy directions.