



ONTARIO PUBLIC
SCHOOL BOARDS'
ASSOCIATION

Leading Education's Advocates

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To: The Honourable Lisa Thompson, Minister of Education

Cc: Martyn Beckett, Assistant Deputy Minister, Student Achievement Division
Andrew Davis, Assistant Deputy Minister, Education Labour and Finance
Division

From: W.R. (Rusty) Hick, Executive Director

Subject: Next Phase of Consultation on Hiring Practices and Class Size

The Ontario Public School Boards' Association represents English public school boards and 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 students in the English public school system in Ontario. OPSBA believes that the role of public education is to provide universally accessible education opportunities for students of all ethnic, racial or cultural backgrounds, social or economic status, individual exceptionality and faith. Under the *School Boards Collective Bargaining Act* (SBCBA), OPSBA is the designated employer bargaining agent for all 31 English Public School Boards as well as the school authorities.

OPSBA appreciates this additional opportunity to engage with the government in the consultation on Ontario Regulation 132/12: Class Size and Ontario Regulation 274/12: Hiring Practices.

Background

As outlined in our submission on February 14, 2019, (attached) on the same matters OPSBA has been advocating on behalf of English public school boards in Ontario and engaging in dialogue with government regarding teacher hiring and class size for many years. We welcome this opportunity to continue that dialogue.

Hiring Practices

Since the introduction of Regulation 274/12 – Teacher Hiring Practices, OPSBA has held the view that repealing this regulation would be in the best interests of students because hiring the best teachers without restrictions creates the best schools. Repealing the regulation would also assist the government in achieving their stated goals as articulated in the consultation document. OPSBA has previously outlined the many challenges school boards have faced since the introduction of the teacher hiring regulation. In this consultation it appears the government is not proposing repealing the regulation as recommended by OPSBA, but instead making amendments to Regulation 274. OPSBA remains concerned that previous attempts at improving the regulation through amendments have been unsuccessful. However, with the changes described in the consultation document, we are optimistic that some of the hiring challenges that school boards face when trying to ensure every student has the very best teacher will be addressed. Additionally, OPSBA would welcome the opportunity to engage further with the government regarding the development of the Policy and Program Memorandum (PPM) on equity and diversity in hiring practices.

Class Size

Based on the previous consultation on class size, OPSBA continues to hold the view that the flexibility found in board-wide class size averages with a designated count date (and in semestered secondary schools, two count dates) provides the best opportunity for school boards to meet the unique learning needs of each student. We maintain that this flexibility is required in all grades and note that kindergarten classes have an average of 26 and a cap of 29, grades 1-3 have a cap of 20 with up to 10% of classes capped at 23, and grades 4-8 have an average of 24.5. More detailed feedback regarding class size for Kindergarten to Grade 8 has been provided in OPSBA's February 14, 2019, submission (attached).

Grade 9-12 Class Size:

With the current funded average of 22:1, class size typically ranges from 30+ in academic courses to 15 in courses where students require additional support, or where there is a safety or specialized equipment requirement. The students in smaller classes are usually those heading directly to the world of work, skilled trades or college programs.

Secondary programming, timetabling and staffing is complex. The reasons for this are three-fold:

1. Schools have to ensure that students can earn the credits required to earn their Ontario Secondary School Diploma (OSSD);
2. Teachers require different specialized qualifications to teach certain subjects and;
3. Specialized equipment or classrooms are required for many programs.

There are many specialized courses and programs designed to prepare students for the world of work, college, and skilled trades, and these courses typically have smaller class sizes.

OPSBA has concerns regarding the proposed increase to the funded average for secondary school class size to 28:1. A number of our member boards currently struggle to meet the 22:1 obligation, and those boards will find 28:1 to be an impossible target. If the proposed increases to class size are implemented, schools will be unable to offer specialized courses. This in turn will negatively impact the ability of many students to graduate from high school and pursue their chosen careers.

As teachers retire from specialized areas, and if they are not replaced due to attrition targets, programs would have to be cancelled. For example, a woodworking program requires a teacher who holds a teaching certificate in construction technology. If the teacher retires and no replacement can be hired due to attrition targets, the school can no longer offer woodworking courses.

When considering an appropriate class size, the specialized facilities required to offer certain programs is a critical factor. For example, for courses that prepare students for a career in the food and hospitality industry, schools have commercial kitchens. For health and safety reasons these specialized classrooms have capacity limits. However, as the class size average increases, it will be impossible for schools to continue to offer these classes where only a small number of students can be accommodated. These courses can no longer be supported and will be closed to accommodate larger class sizes in other subject areas that are not limited by facility restrictions.

Having choice in course options is essential for students to pursue their interests and passions. Choice through elective courses motivates and engages learners to make pathway decisions that best match their strengths and interests. With fewer teachers in our schools there will not be enough specialized expertise available to offer a variety of elective courses. This challenge will be magnified in small schools and in rural areas.

Students need to study at a level that is appropriate to their academic needs. Currently, those levels are academic, applied and essential. In order to meet students' needs, schools offer a variety of classes at those levels. Particular courses have class sizes that are lower in courses where students require more support and higher where students learn more independently. As the funded average for class size increases, a school's ability to continue to offer courses with smaller class sizes will be diminished. Schools will either have to cancel courses or, in order to retain them, combine courses together into larger classes, resulting in less suitable support for students.

A school's ability to offer programs such as the Specialist High Skills Majors (SHSM) will be severely limited. These programs bundle together specific courses in a selected field and allow students to earn valuable industry certifications and 'on the job' skills and experience. However, with a reduction in elective programs and less flexibility (fewer

classes) in the schools' timetable, it will be very difficult for a school to maintain this program.

Maximizing student engagement and motivation is even more essential for students at risk. Students who are at risk of not earning a credit should have access to credit recovery programs during a semester as well as other student success programs that are designed with smaller classes to maximize teacher contact. Special education students with IEPs often require added support, guidance and program accommodation in classrooms and as such it is important to ensure that class sizes that allow for this.

With fewer adults in the building there will be fewer opportunities for students to build nurturing relationships. The benefits of students having a caring adult in their lives has been proven. These relationships are vital to supporting the well-being and mental health of all students, but particularly those at risk either medically, socially or emotionally. Additionally, there will be fewer adults to provide supervision of students during their unstructured time. Teacher and education workers often volunteer their time to offer extra-curricular activities that are important to student engagement and a sense of belonging in high school, and now there will be fewer of them to do so.

E-Learning

OPSBA is supportive of the use of technology as an instructional vehicle to enhance student learning and to provide access to courses that otherwise would be unavailable. E-learning is currently used successfully in school boards as an option for students to increase access to a wider variety of programs. This is especially true in small, remote and rural schools, as well as for students who are unable to attend school for a variety of reasons. Digital learning is successfully and widely integrated into classroom instruction to increase student achievement, enhance student engagement and prepare them for life-long learning.

However, it is a fact that independent E-learning courses have a higher attrition rate than courses taught in the classroom. This is often linked to a student's lack of time-management, self-regulation, organizational and study skills, together with insufficient personalized teacher contact to guide student learning. Making four e-learning courses mandatory and having classes of 35 could exacerbate the issue of attrition.

Students must be supported in their first experiences of E-learning to ensure they are properly prepared and able to cope with the self-directed demands of an E-learning curriculum delivery model. OPSBA supports E-learning as a necessary component of secondary education but would appreciate further discussion of the proposed mandatory four credits.

OPSBA member boards, particularly those in rural and northern areas, have identified the lack of student access to broadband internet as a barrier to participation in E-learning. Many school boards have invested in increased broadband capacity in their schools, however schools would not necessarily have sufficient capacity to support the

volume of students accessing computers to complete their E-learning courses during the school day. Frequently this broadband enhancement exists only at the local school and not in the student's home or at the local library. OPSBA boards have shared other concerns about equity of access, specifically regarding the impact on families in poverty, and a lack of access to the internet and technology outside of school.

OPSBA boards have expressed concerns about the level of support required by students identified with special education learning needs, and English language learners.

Many questions remain regarding the implementation of the proposed mandatory four credit model with a class size of 35 students. These questions range from concerns about supervision of students, graduation rates, funding levels, how the current credits offered through E-learning will co-exist with the new centrally developed E-learning courses, relevance of curriculum that is centrally developed and not locally personalized, and impacts on small schools and the possibility of increased school closures.

OPSBA looks forward to working with the government to address these important concerns regarding E-learning and to ensure that students are properly supported as they work toward earning a high school diploma.

Next Steps

OPSBA understands the fiscal challenges facing the province and appreciates the opportunity the government has provided to help find solutions that balance fiscal responsibility with supporting student achievement and well-being which is always the top priority for school boards.

OPSBA is available for clarification, additional comment and feedback should the government identify the need for further consultation on these matters.