



ONTARIO PUBLIC  
SCHOOL BOARDS'  
ASSOCIATION

**Leading Education's Advocates**

**Ontario Public School Boards' Association**

439 University Avenue, 18th Floor  
Toronto, ON M5G 1Y8  
Tel: (416) 340-2540  
Fax: (416) 340-7571  
webmaster@opsba.org  
www.opsba.org

Michael Barrett  
President

Gail Anderson  
Executive Director

## A Brief to the Ministry of Education

---

### Re: School Board Efficiencies & Modernization Consultation

**Ontario Public School Boards' Association**  
**Brief Re: School Board Efficiencies & Modernization Consultation**

***Introduction***

The Ontario Public School Boards' Association (OPSBA) would like to provide our perspective and comments as the Ministry of Education undertakes the task of developing the 2014-15 Grants for Student Needs (GSN) & consults the education sector with respect to opportunities for efficiencies and modernization. OPSBA appreciates the Ministry of Education for consulting with the sector on these important funding issues.

OPSBA has reached out to all English Public school boards in the province through our consultation process. OPSBA consulted with senior business officials, attended the ministry-led stakeholder session and discussed the consultation questions with our trustee working group, Executive Council and Board of Directors. We are also aware that many individual trustees and school boards provided submissions.

General comments from the perspective of our school boards include the following:

- School boards appreciate the opportunity for authentic consultation on these important funding issues with the goal of establishing long term funding strategies that are sustainable
- Significant change requires time and often requires upfront financial investments
- Schools boards are constantly seeking ways to be more efficient
- School boards are tasked with both student achievement and well-being – these responsibilities guide decision making
- Decisions must be made through programming needs, not just financial targets – the best interest of our students is the primary focus of school boards

OPSBA received the following feedback from our school boards with respect to the specific areas of focus in the School Board Efficiencies & Modernization Consultation Guide.

***Subsection 1 – Underutilized and Small Schools***

- This is a long-term objective as it would be difficult/impossible to close schools prior to 2014-15 GSN
- School boards have been making difficult decisions to close schools for many years
- These decisions need to consider more than just the financial savings. Schools are vital to the community
- Underutilized and rural schools are two different things. These should be considered separately
- The introduction of the school foundation grant in 2006 was an important step in creating a sustainable funding model and addressed deficiencies that had existed in the model for many years (previously school administration had been funded on a per pupil basis). Changes to the funding formula supports for both underutilized and small schools will undo a very positive step that was made in 2006.
- Some school boards are frustrated over the lack of “sharing” – space, transportation etc. (especially in Northern Ontario). Some recent capital allocations have disrupted existing sharing arrangements.
- Many school closures are contingent on boards receiving approval for new capital
- Consideration must be given that when a school closes, students are potentially bussed to another school location. This increases the transportation costs.
- Boards wanted a more fulsome discussion of program viability and recognized that viability may differ based on circumstances (e.g. impact of geography)

**Ontario Public School Boards' Association**  
**Brief Re: School Board Efficiencies & Modernization Consultation**

- Drastic changes to declining enrolment supports &/or school foundation grants could unleash a significant number of ARCs that would be destabilizing both politically and practically
- Important for small schools to be recognized. Government can't abandon these schools as they are sometimes the last public entity left (after businesses, public health leaves etc.)
- What is the definition of a rural school? This would vary across the province.
- What is the definition of a small school?
- Need to consider bus routes, length of bus rides, proximity to other schools, board catchments. These are all conditions that would impact whether a school can be closed
- Partnerships could save a small school. However appropriate partners don't exist in all communities and partners need to be financially viable and able to reimburse the board for operational and capital costs
- Competition for students creates barriers to sharing and partnerships
- Most expenditure pressures exist regardless of declining enrolment

***With regard to the current ARC process***

- Request to dispense with the requirement for staff to offer options
- Suggest a shortened process if two schools are within 15 km of each other
- Value to community & value to local economy are essentially the same thing and should be treated as such in the ARC process
- Many ARCs only work if boards receive approval for new capital
- ARCs are political and more so when timing is close to municipal/provincial election
- The current school foundation supports make it more difficult to close schools. Often the financial analysis presented during the ARC process details only minimal net savings due to the loss the funding supports when the facility is closed
- ARCs consider a minimum timeframe (number of meetings); why not consider a maximum length of time?
- In general the timelines need to be shortened and it would be helpful if there were fewer community and committee meetings required.
- Consolidation of school accommodation is a local board decision but is significantly influenced by provincial education funding policy. Often local municipalities and even MPPs oppose school consolidation. More inter-Ministerial cooperation and understanding are required to support boards in the ARC process

***Subsection 2 – Declining Enrolment Supports***

- Declining enrolment supports were examined thoroughly through the work of the Declining Enrolment Working Group (DEWG) in 2009 and adjustments were made to the funding support based on that review. There is no need to review this grant again at this time
- The Declining Enrolment Adjustment grant is purely transitional and is currently meeting the needs of school boards
- There is an ongoing need for the school operations & renewal top-up grants while boards continue to rationalize their accommodation needs as enrolments continue to decline
- There was some discussion about the need to review Ontario Regulation 444/98 Disposition of Surplus Real Property

***Subsection 3 – Improved Accountability***

- There are numerous EPO grants and the individual reporting is time consuming

**Ontario Public School Boards' Association**  
**Brief Re: School Board Efficiencies & Modernization Consultation**

- Little support for the concept of having less accountability if you have high student achievement. This leads into an entirely separate discussion about what is “achievement”? School boards are also responsible for well-being
- Suggestion to explore consolidating some of the EPO grants based on “themes” and allow boards to choose which EPO grants they require based on program need
- Some EPO grants pull teachers out of the classroom and this goes directly against the fact that students do better with fewer classroom disruptions
- Financial reporting requirements should vary based on the amount of the grant. Based on materiality, smaller grants should not require the same detailed reporting & audit
- Regional Internal Audit Teams and Audit Committees. The added value of regional internal audit is still not evident to a number of school boards
- EPOs should have multi-year commitments that allow for multi-year planning
- Reporting should focus on outcomes as opposed to activities

***Subsection 4 - Share Efficiency Savings***

- The implication that school boards “may be reluctant to pursue efficiencies as vigorously as they might otherwise...” is inaccurate. School boards are always pursuing efficiencies either individually or through cooperatives. A barrier to achieving efficiencies is workload of school board administrators and initial investment
- Boards identified examples of Ministry not wanting unspent EPO dollars returned, this sends a mixed message in terms of financial restraint and efficiency
- There was an interest in having more discussion regarding the Shared Services report for school boards in Eastern Ontario
- Greater buy-in if boards are encouraged to find savings themselves
- Consider operational review recommendations and E&E review recommendations as ideas to achieve greater efficiencies

***Subsection 5 – E-Books and E-Learning***

- Some collective agreements contain language impacting the delivery of e-learning courses that could be a barrier to achieving efficiencies and savings
- E-learning is not always the best option for student success. Educators would be best to comment on this initiative
- Many northern boards are implementing e-learning strategies due to declining enrolment but are also looking at different delivery methods, including a blended approach where students are in one location and a teacher in another (as opposed to students in many different locations).
- The discussion question suggesting that perhaps “all students to complete one course” via e-learning seems to be more of an educational question than financial. Not all students would be able to handle this option
- The delivery of programming and supervision needs to be considered

***Subsection 6 – New Technologies***

- General agreement that this is a challenge for non-urban boards (not just the northern boards)
- Schools and boards with smaller student populations don't always have the benefit of high speed internet access and the cost of this infrastructure can vary significantly across the province
- In smaller communities, the number of suppliers is limited
- Some boards have eagerly taken on providing high speed access but are now seeing significant growth and have been caught by unexpected costs

**Ontario Public School Boards' Association**  
**Brief Re: School Board Efficiencies & Modernization Consultation**

- With bandwidth growth and multi-platform capabilities, there is a cost impact in providing security. Total cost of ownership needs to be considered
- Many Boards have significantly different plans with respect to technology. It would be interesting to bring some consultation towards what are the technologies that are improving education in the classroom. There was a sense that the Ministry of Education does not have an adequate vision for the use of current technology in the schools
- Northern school boards are especially impacted by the lack of vendors providing this infrastructure. There was some discussion as to whether OECM could play a greater role in this regard
- The Ministry (or OECM) should negotiate the licenses for e-textbooks for all Boards to achieve the greatest economies of scale
- Need to increase teacher capacity and consider different ways to deliver this type of PD
- There was some discussion regarding approaching this issue based on regional models.
- Must focus on student outcomes

***Subsection 7 – Getting the Balance Right***

- The government should not reduce funding without providing the tools to school boards to deal with the changes and continue to meet the needs of students
- Boards do not want to be micro-managed by the government. Need ability & autonomy to make local decisions
- Request for the government to conduct authentic consultations and meet with appropriate groups (reference to COSBO meetings are more spent with the government giving updates instead of seeking advice)
- At the same time, school boards need to be authentic in these consultations and offer insights and suggestions where savings may be achieved
- Consensus that one of the largest areas for possible efficiencies is in IT. Suggest that the government coordinate an IT working group with the understanding that there needs to be a long term strategy (e.g. consider viability of IT service hubs and cloud technology)
- Government needs to take a long term approach to funding, not annual snapshots to meet bottom lines (multi-year funding provides stability)

***2014-15 GSN Consultation***

Since the Efficiencies & Modernization Consultation also serves as the consultation process for the 2014-15 GSN, OPSBA would like to bring to the attention of the Ministry of Education some additional comments and concerns with respect to the funding model.

School boards would appreciate an **early announcement** of the 2014-15 GSN to allow them to make good local decisions.

OPSBA continues to advocate for a **full review of the current funding model** involving consultation with all stakeholders to ensure that the model meets the needs of all students in the province.

OPSBA recommends that the Ministry of Education **continue to monitor and fund the cost pressures resulting from the various Memoranda of Understanding (MOUs)** that are currently in place.

OPSBA anticipates that any collective agreements will be fully funded. OPSBA will work with the government to identify the costing to support collective bargaining activities as contemplated by proposed Bill 122, *School Boards Collective Bargaining Act, 2013*.

**Ontario Public School Boards' Association**  
**Brief Re: School Board Efficiencies & Modernization Consultation**

OPSBA continues to hear concerns from school boards related to **FDELK Program**. The concerns focus on over enrolment of students during the implementation phase of the program and the funding shortfall for some school boards related to the actual salary rate for Early Childhood Educators (ECEs) employed in the program.

**Special education funding** continues to be one of the primary areas of concern for our school boards. In particular, some boards have expressed concerns regarding inequities in the allocation of the Special Education High Needs Amount (HNA).

It is important that the special education funding model demonstrate that it is taking into account the growing number of special education students in our schools. Many school boards continue to struggle with underfunding of special education needs.

OPSBA recommends that the Ministry of Education continue its work in refining special education data collection and ensure that special education funding is adequate and allocated equitably to meet the needs of all students.

Funding of **First Nations, Métis and Inuit Education** continues to be a priority for OPSBA. OPSBA continues to recommend that:

- (a) the Ministry of Education work with partner Ministries across Canada and with First Nation organizations with a view to discussing with AANDC ways to resolve the inequities in education funding for First Nation communities; and
- (b) Continue to support, through sustained First Nation, Métis and Inuit education funding, the needs of First Nation, Métis and Inuit students who attend Ontario schools, whether they are from on-reserve communities or from the local population of the board.

Funding for Native Students and Native languages is a specific issue that connects to the Grants for Student Needs. OPSBA has frequently heard from First Nations who have Education Services Agreements with school boards. They are often astonished to learn that Native Studies and Native languages are not part of the regular tuition fee but must be paid for by the First Nation over and above the cost of the basic tuition fee. This provision seems at odds with the intent and principles of Ontario's First Nation, Métis and Inuit Education framework and much goodwill in terms of supporting First Nation students would be gained by addressing the issue.

A key priority for OPSBA continues to be advocacy for **children and youth mental health** which aligns with the expectation of "promoting student achievement and well-being" and is among the accountabilities of a school board. OPSBA is strongly supportive of the government's Comprehensive Mental Health and Addictions Strategy and understands the need for an initial phased in implementation plan to support the full continuum of services for students and families that includes mental health literacy, promotion of positive social-emotional development, prevention of mental health problems, intervention services and clear pathways to care. It is vital to recognize that investing in children's mental health and well-being is an investment in Ontario's future sustainability and prosperity.

OPSBA recommends that the Ministry of Education continue to include in the GSNs or EPO grants provision for the multi-year phased-in approach to support a full continuum of mental health supports and services.

**Ontario Public School Boards' Association**  
**Brief Re: School Board Efficiencies & Modernization Consultation**

OPSBA's submission strongly supports the various elements of the existing implementation plan and requests that the Ministries involved:

- (a) continue to provide funding to effectively implement Mental Health Literacy support K-12 incorporating training for all staff working directly with children and youth in schools;
- (b) embed the funding for the Mental Health Lead in the GSNs going forward for sustainability in years 4 to 10 of the comprehensive strategy;
- (c) maintain the ASSIST coaching support in year 4 to continue to support all school boards with mental health leads;
- (d) provide funding support for school-wide promotion of positive social and emotional development to strengthen mental health literacy among children and youth themselves;
- (e) provide a core of sustainable funding to Kids Help Phone for children and youth mental health
- (f) provide an increase in the number of mental health workers and registered nurses in schools across the province;
- (g) expand and support Working Together for Kids Mental Health to all communities in the province.

Mental Health Literacy Support K-12 must continue to align with the Student Support Leadership Initiatives (SSLI) and climate work in each Board to continue to build a culture of caring for all students and to deepen local partnerships with mental health and health organizations to facilitate timely and responsive access to care. It is vital as well that mental health promotion be integrated into existing curriculum in addition to school-wide and community efforts to build resiliency in our students.

OPSBA has released a document entitled ***A Vision for Learning and Teaching in a Digital Age***. This document is a call to action regarding the development of a provincial vision. With Ontario positioned as a leader in education, it is incumbent on the government to place an emphasis on technology beyond simply a pilot project approach to encompass the use, application, development and integration of 21<sup>st</sup> century skills into student learning and instructional practices.

OPSBA continues to recommend that the Ministry:

- (a) re-establish the technology budget line to enable school boards to continue to adequately implement a staged plan to provide reasonable and equitable access to current technologies and applications;
- (b) expand the funding of exemplary practices to all boards of education in the province;
- (c) provide professional development funding to support a range of capacity building opportunities for teachers to integrate technology and 21<sup>st</sup> century skills into their instructional practice
- (d) and ensure adequate levels of funding for *elearning* courses.

The Ministry of Education should monitor **new legislation and regulations** for possible funding implications, some examples are as follows:

- New Occupational Health and Safety Awareness Training regulation, which will take effect July 1, 2014. This regulation mandates basic occupational health and safety awareness training for all workers and supervisors
- Bill 143, *Child Care Modernization Act, 2013*. This proposed legislation would require schools to ensure before and after school programming for children ages six to twelve years old where there is sufficient demand.
- Future PPM regarding Concussions. This may require school boards to provide communications and training.

**Ontario Public School Boards' Association**  
**Brief Re: School Board Efficiencies & Modernization Consultation**

OPSBA continues to hear concerns from many school boards about two specific areas of the current funding model, **special education and student transportation**. The concerns with respect to student transportation go beyond funding to areas such as consortia governance and operation and procurement of transportation services. OPSBA is of the view that the concerns with respect to special education and student transportation are sufficiently significant to warrant the establishment of working groups to thoroughly review the concerns expressed by school boards.

Finally, OPSBA would like to provide feedback with respect to the ***Capital Priorities Review Process***. There is a significant need for capital infrastructure dollars and OPSBA appreciates the fact that the Ministry of Education has established the *Capital Priorities Review Process* to provide consistency of information from school boards to help Ministry staff analyze many, often diverse requests for funding to support the Ministry's and boards' capital priorities. However, the current need for capital funding in the sector is much greater than the amount of recent allocations. Additionally there are concerns regarding the current regulation regarding education development charges. OPSBA is of the view that it is time to have a conversation with the sector about additional sources of capital funding to meet the backlog of infrastructure needs in our sector.