



Ontario Catholic School  
Trustees' Association

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August 24, 2006

Tonia Grannum  
Clerk  
Standing Committee on the Legislative Assembly  
Room 1405, Whitney Block  
Queen's Park  
Toronto ON M7A 1A2

Dear Ms. Grannum:

**Re: Bill 52 – Education Statute Law Amendment Act (Learning to 18), 2005**

OCSTA appreciates the opportunity to provide input to the Standing Committee on the Legislative Assembly regarding Bill 52, Education Statute Law Amendment Act (Learning to 18), 2005.

Founded in 1930, the Ontario Catholic School Trustees' Association (OCSTA) represents 29 English-language Catholic district school boards and five English-language Catholic school authorities. Collectively, these school boards educate over 600,000 students from junior kindergarten to grade 12.

OCSTA supports the government's efforts to keep students in school longer and reduce the dropout rate by providing high quality, relevant programs for every student in Ontario. We offer the following comments on Bill 52.

**1. Pupil Learning to the Age of 18 and Related Amendments to the Highway Traffic Act**

The proposed legislation provides for amendments that will increase the age for compulsory attendance in school from 16 to 18 years. It strengthens existing penalties for truancy of school-aged minors and adds additional penalties, including limitations on the granting of driver's licenses to truants.

If the draft legislation is passed, school boards will be required to initiate a number of new administrative procedures. It will be the role of school boards, for example, to determine and attest to students' compliance with attendance requirements, particularly in the drivers' license application process. If a student already has a driver's license, a judge may suspend that license if the student, based on certification provided by a school board, is not in compliance with the compulsory attendance requirements.

Requests for confirmation of attendance will have to be processed by the school principal or, during periods when the principal is not available, such as vacation periods, by someone designated to assume this responsibility. New administrative procedures will add to the demands on boards' administrative personnel and will constitute new costs for school boards.

In order to reduce the administrative burden of these new processes, and make them as cost-efficient as possible, **OCSTA recommends that the Government design a standard, simple form "Confirmation of compliance with attendance requirements" for all boards to use when students are seeking a driver's license.**

**Further, OCSTA recommends that the Government provide necessary funding to boards to allow for anticipated additional human resources needed to implement the requirements of the Bill, including reporting, recording and providing certificates with respect to attendance requirements.**

Dedicated funds will ensure successful implementation of these proposed amendments without imposing additional burdens on boards.

Should Bill 52 be enacted, students found not to be in compliance with attendance requirements will have the right to appeal that finding. The nature of that appeal process is as yet unknown. Regardless of the nature of the process, it is very likely that it will require the use of school boards' human and financial resources.

**OCSTA recommends that, should Bill 52 be enacted, a Regulation be issued that would set out details regarding how and to whom an appeal would be made and handled in cases where it has been determined that the student is not in compliance with attendance requirements.**

**OCSTA also recommends that necessary funding be provided to school boards to recognize the new cost associated with the appeals arising from the requirements of Bill 52.**

Beyond the existing statutory provisions which excuse students from attending school, Bill 52 would amend the *Education Act* to provide for regulations setting out further exceptions. Bill 52 would also give the Minister the power to create regulations which stipulate the conditions under which students under age 18 may be excused from school attendance and the procedures for doing so.

OCSTA assumes that school boards will play a central role in the process of such excusals, as they do now in the SALEP process. OCSTA raises general concerns regarding the standards and procedures that will be set out to assist boards in determining whether or not students under 18 will/may be excused from attending school and **recommends that school boards be involved in a consultation leading up to the writing of the Regulation governing excusals.**

## 2. Equivalent Learning

The proposed legislation also provides for “equivalent learning” opportunities to be recognized or created as an alternative to the regular education system.

School boards will be required to develop and implement a number of policies and procedures to enable the participation of students in “equivalent learning” opportunities.

OCSTA notes a number of programming, contractual, logistical and financial issues that will arise as equivalent learning programs are implemented, including those related to:

- The provision of staff for alternative programs, including staff to assist disengaged students and students who had previously dropped out of regular day school programs
- The initial credentialing of , and additional training needed for, teachers and other staff involved in the alternative and adult education programs
- The contractual relationship of such staff to school boards, especially those staff at work sites and at community colleges
- The operational procedures and protocols necessary to coordinate school board staff and employees of other organizations in the delivery of alternative programs
- The responsibility to ensure criminal record checks for all staff involved with the programs
- The requirements organizations must fulfill in order to be recognized by the Ministry as providers of equivalent learning
- The variation in resource base and work place capacity in communities to deliver alternative programs
- The accessibility of alternative programs for small and rural schools
- The scheduling and pupil-teacher ratio of these alternative programs
- The development of curriculum and e-learning resources for these programs the determination of curriculum and e-learning resources for these programs, the determination of appropriate standards for the program curriculum
- The necessity to ensure that safety requirements are met
- The cost and provision of necessary resources, including costs associated with coordination and communication
- The costs of providing the building capacity, infrastructure, transportation and administration that may be associated with equivalent learning opportunities.

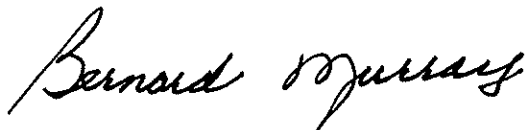
Many of these issues are currently being looked at by a variety of working groups within the Ministry of Education. It is essential that sufficient time, attention and resource be given to each of

these important issues in order to ensure that these important and ambitious changes to the fabric of secondary school education in Ontario are successfully implemented.

It will be the responsibility of the Catholic system, in partnership with the Ministry of Education, to ensure that the mission and mandate of Catholic education are fulfilled in whatever setting students find themselves, including in equivalent programs delivered outside the regular school program.

Thank you again for affording our Association the opportunity to comment on this important Bill. We trust that our concerns and recommendations will receive due consideration by the Standing Committee.

Yours sincerely,

A handwritten signature in cursive script that reads "Bernard Murray". The signature is written in black ink and is positioned above the typed name and title.

Bernard Murray  
President