

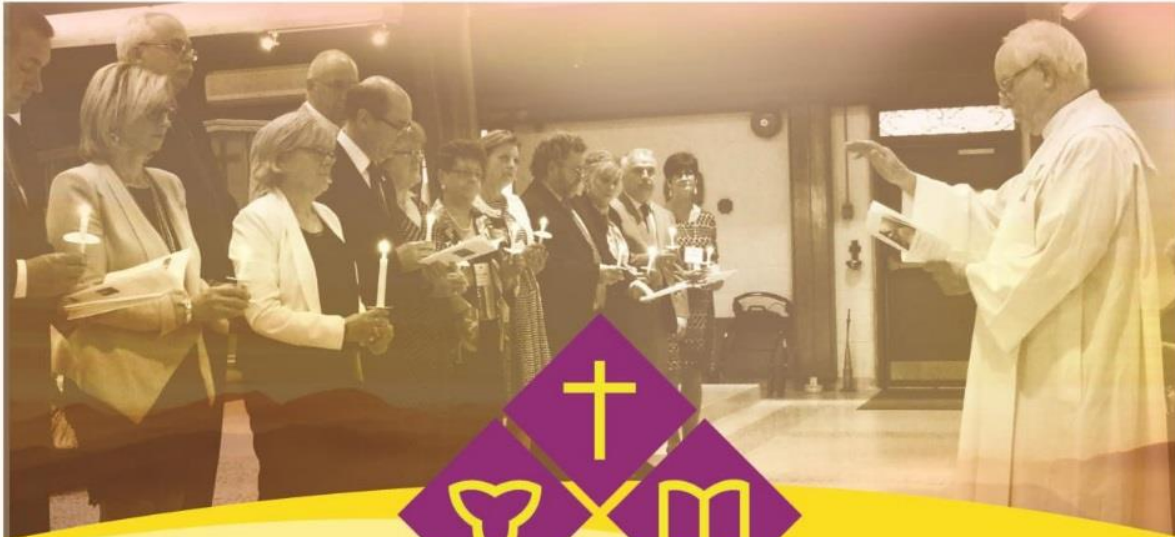
A Submission to the  
Minister of Education

**Re: Pupil Accommodation Review Guidelines & Community  
Planning & Partnerships Guideline**

December 4, 2017



Ontario Catholic School  
Trustees' Association



## **Ontario Catholic School Trustees' Association**

### **Mission Statement**

Inspired by the Gospel, the Ontario Catholic School Trustees' Association provides the provincial voice, leadership and service for elected Catholic school trustees to promote and protect publicly funded Catholic education in Ontario.

### **Vision Statement**

Ontario is enriched by a publicly funded Catholic education system, governed by locally elected Catholic school trustees who serve with faith, commitment and compassion.

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## Introduction

On behalf of the Ontario Catholic School Trustees' Association ("OCSTA") we are pleased to provide you with our submission on the Ministry of Education's proposed revisions to the Pupil Accommodation Review Guideline ("PARG") and the Community Planning and Partnerships Guideline ("CPPG"). The submission also reflects our recommendations to the ministry's earlier consultation "supporting students and communities: Ontario's rural education strategy" (June 2017) and are the result of consultations with our Catholic school boards.

The Ontario Catholic School Trustees' Association (OCSTA) was founded in 1930. It represents 237 elected Catholic trustees who collectively represent 29 English-language Catholic district school boards. Together, these school boards educate approximately 545,000 students from junior kindergarten to grade 12 and adults in continuing education programs province-wide.

Inspired by the Gospel, the Mission of the Ontario Catholic School Trustees' Association is to provide leadership, service and a provincial voice for elected Catholic school trustees who seek to promote and protect publicly funded Catholic education in Ontario.

## Context for the PARG and CPPG Proposed Reforms

As part of the province's *Plan to Strengthen Rural and Northern Education* the ministry of education indicated that it is committed to amending its PARG and to support improved co-ordination of community infrastructure planning which would involve revising the CPPG. The ministry of education's objectives in reforming the PARG and CPPG are:

- Create a more collaborative process that better promotes student achievement and well-being;
- Better recognizes the impact of school closures on rural communities.

## OCSTA General Position

OCSTA welcomes the ministry of education's next stage in its consultations on strengthening rural and northern education in Ontario. Developing specific tools and processes to improve collaboration and working relationships with municipal government and community organizations are a key component of developing long-term student accommodation plans that promote student achievement and well-being, while at the same time recognizes the impact of school closures on northern and rural communities. In our June submission, OCSTA called on the government to encourage all parties to work together in the best long-term interests of students. We also recommended that school boards "have adequate resources and funding to conduct meaningful PARs and MPARs and the autonomy and flexibility to respond to the needs of local communities" (p.6).

Catholic school trustees clearly recognize that decisions related to underutilized schools and possible school closures have a significant impact on their local communities, parishes, students, families and local businesses. The loss of a Catholic school in a rural community may mean the

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loss of Catholic education in an entire region of the province. That is why Catholic school boards develop comprehensive, sensitive policies and processes for conducting pupil accommodation reviews in full compliance with the PARG. It should be noted as well that accommodation reviews take place after other options are explored by school boards for managing underutilized space such as:

- Moving attendance boundaries and programs to balance enrollment
- Offering to lease space to other school boards
- Finding community partners that can pay the full cost of operating the underutilized space.<sup>1</sup>

Below OCSTA offers comments on the policy options proposed to reform the PARG and CPPG.

### **Proposed Policy Options from the Ministry of Education**

#### **1. Revising Pupil Accommodation Review (PAR) timeframes:**

- Extending the current minimum PAR timeframe beyond five months;
- Eliminating the minimum modified PAR timeframe of three months; and/or
- Further extending time-frames under specific circumstances, such as if new closure recommendations are added mid-way through the accommodation review process.

### **OCSTA Concerns and Recommendations**

The PARG has undergone extensive consultations over the past few years in an effort to improve the process for school boards, students and community stakeholders. In order to minimize disruption and substantive changes to existing school board PARG policies and planning frameworks, the revisions to the PARG should be minor and fill potential gaps in the planning process. This will ensure the resulting revisions do not create increased anxiety on parents, students and the school board community.

As a result, OCSTA recommends not changing the minimum time frame of five months for a PAR or the elimination of the Modified PAR time frame of three months. The modified PAR was developed for cases that are relatively straightforward and don't require extensive consultations, reports and protracted public debate. Eliminating this option for boards will remove the flexibility to conduct the appropriate sort of PAR given local circumstances.

OCSTA would support, however, extending time frames under specific circumstances where substantive new information is introduced into the PAR or new school closure recommendations occur mid-way through the review process but within a single school year. This would give school boards and other stakeholders the time necessary to review the new information or recommendations and respond accordingly.

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<sup>1</sup> PAR Guideline, 2015 p. 3.

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## 2. **Introducing Minimum Requirements for the Initial Staff Report by Requiring School Boards**

- At least three accommodation options (a recommended option, an alternative option and a status quo option).
- Information on how accommodation options will impact:
  - a. School board budget;
  - b. Student programming /achievement;
  - c. Student well-being; and
  - d. Community and/or economic impact.

### **OCSTA Concerns and Recommendations**

The current PARG requires school boards, in the initial staff report, to provide one or more options to address the accommodation issues facing the board. It also requires boards to develop a “recommended option” if more than one option is presented for consideration to the school board community. It is not clear how adding an alternative option and a status quo option would improve the accommodation planning process. The whole point of a PAR is that the “status quo” no longer serves the needs of the students or the school board and various options are being presented to improve the accommodations for students with the goal of providing the highest quality Catholic Education.

In addition, the current PARG requires boards to “identify any program changes as a result of the proposed option” and its impact on changes to existing facilities or any new facilities that may be required as a result of the PAR. It also requires boards to identify how it intends to fund any new capital investments that may fall out of the PAR. Also the current PARG directs boards to use information from local governments and community partners in their accommodation planning and options analysis. In other words, the current PARG directs boards to consider budget impacts, student impacts, and local community economic impacts. It is therefore unclear how these proposed changes to the initial staff report will capture any new information on the impact of a PAR process or clarify the potential impacts on the local community.

### **3. Promoting community input in the PAR processes by requiring:**

- School boards to invite elected municipal representatives and municipal staff to a meeting to discuss the initial staff report;
- School boards to disclose municipal participation / non-participation in PAR and Community Planning and Partnership (CPP) processes;
- A broader role for trustees throughout the PAR process, beyond ad hoc membership of Accommodation Review Committees, hearing public delegations and making the final decision; and
- A participatory role for secondary student representatives in PARs involving secondary schools.

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## **OCSTA Concerns and Recommendations**

OCSTA believes that inviting elected municipal representatives and staff to meetings to discuss the initial staff report may be beneficial to the overall PAR process. However, we believe that local school boards are best able to make those decisions so as to reflect local circumstances without explicit direction from ministry guidelines.

School boards routinely consult with municipalities at the early stages of a PAR which include discussions of the accommodation options being considered. Boards are best able to make the judgements about how and when to involve local governments in the PAR process since there may be cases where the initial staff report is recommending accommodation options that don't impact or interest the local municipality.

In respect of school boards disclosing municipal participation or non-participation, this may have the unintended impact of complicating school board-municipal relationships in the PAR or CPP process. Municipal planning information—official city plans, growth information, land use plans and so are important for a PAR process and it should be readily available to school boards. But placing school boards in the position of potential rewarding or penalizing municipalities for participating in the process or not may not encourage municipal/board collaborative relationships.

In terms of school board trustee's involvement, OCSTA supports this being determined by local boards. OCSTA is interested in exploring this possible reform option in greater detail.

At the present time, OCSTA does not see the need to expand the participatory role of students in the PAR process. Many are involved in Accommodation Review Committees ("ARCs") under the current guidelines. Student trustee representatives on school boards can voice the concerns of students as required.

### **4. Reforming the PAR Administrative Review Process by:**

- Extending the timeframe to submit an administrative review petition from 30 to 60 calendar days;
- Reviewing the signature thresholds and requirements for launching an administrative review request.



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## **OCSTA Concerns and Recommendations**

Administrative review of a school boards PAR process is generally sought when it is believed a board failed to follow its own PAR policies or did not meet the minimum requirements set out in the PARG. Individuals or groups must submit a copy of the boards PAR policy showing how the PAR did not conform to the policy along with a petition signed by a number of supporters from the school community equal to at least 30% of the affected school's student population. These two steps must be completed within 30 days and the request sent to the Minister of Education. OCSTA does not believe that any changes are required to the PAR administrative review process at this time. They are generally rare challenges to a school boards PAR process and extending the timeframe will only add delays and uncertainty to the process. Our Catholic school boards are very diligent in developing and strictly following their PAR policies and the PARG set out by the ministry of education.

### **Developing Ministry Supports, such as:**

- A PAR toolkit to standardize type and format of initial staff report information;
- A template for use by community partners to engage boards with proposed alternatives to school closures or other proposals for community use of schools; and
- New support for the review and validation of initial staff report information and community proposals by independent third parties.

## **OCSTA Concerns and Recommendations**

OCSTA believes that a standard format for initial staff reports and a "PAR toolkit" are welcome supports to the overall PAR process. This may assist to eliminate confusion among stakeholders and community members in respect of the PAR process.

Background templates to assist community groups with their involvement with boards is also a welcome support. However, OCSTA believes this is best suited to the CPPG consultation process and other pre-PAR accommodation planning processes. We encourage and support enhanced communication with municipalities and other stakeholders to facilitate their participation in CPPG processes.

OCSTA does not believe boards need support regarding alternatives to school closures and other proposals for the community use of schools. These issues are routinely discussed and evaluated within the context of existing PAR process and more informal discussions prior to the launch of formal PARs. In addition, school boards are substantively engaged with community partners and the community hub groups to find alternatives for underutilized space within their facilities. The central challenge for boards in this context are finding community partners with sufficient capital and sustainable funding sources to fully partner with school boards.

OCSTA does not support the use of third parties to validate initial staff report information and community proposals. Most school boards employ highly skilled and experienced staff who have the responsibility to develop accommodation proposals with input from various community stakeholders. Further, having third parties validate initial staff reports or the data relied upon may result in more complexity and delays in the process while undermining the

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authority of school boards to make PAR related decisions.

OCSTA also believes the ministry could play additional roles in developing supports for the PAR and CPPG process. As we outlined in our June submission, the ministry of education could:

- Establish (secure Ministry funding) for a senior executive lead staff position at each school board that can develop and coordinate an integrated multi-year planning framework in collaboration with provincial and municipal governments;
- Identify key leading community partner groups that have sufficient human and financial resources to participate in school board, municipal and provincial planning processes.

**5. The ministry is also supporting improved co-ordination of community infrastructure planning by working with partner ministries and key stakeholders on the following three initiatives:**

- Building upon the Ministry of Municipal Affairs' ongoing integrated local planning work to better facilitate local relationships and partnerships, including between school board and municipal governments, particularly in rural and northern communities.
- Revising the CPPG to:
  - Better align with integrated local planning processes;
  - Encourage joint responsibility for integrated community planning, with a focus on communication between school boards, municipal governments and community partners about boards' capital plans;
  - Highlight the potential for community use of open and underutilized schools; and
  - Require that boards disclose municipal participation and non-participation in CPPG meetings.

### **OCSTA Concerns and Recommendations**

OCSTA generally supports these proposed changes to enhance relationships between local governments and school boards. However, we have some hesitation about schools being placed in the role of disclosing municipal participation and non-participation as mentioned above.

OCSTA also supports the proposed revisions to the CPPG to encourage joint responsibility for integrated community planning involving a boards capital plans. However, in the context of PARs and CPPs it must be clear that school boards are the decision makers and responsible for student achievement and well-being and thus must be the lead body in these processes. Joint responsibility for integrated planning as it involves school board facilities and resources must recognize school boards ultimate decision making authority.

The sharing of key information among all partners will improve the overall outcomes of a school boards long term capital and accommodation plans that best serve the needs of students, community groups and local governments.



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In addition, school communities are more engaged and invested in an accommodation planning process that results in enhanced and new school facilities, including community agencies. A targeted stream of funding to make capital improvements to existing facilities or create new facilities is key to a successful process and higher degrees of community support. OCSTA looks forward to discussing these issues in more detail and how the proposed changes will enhance community infrastructure planning.

**6. Continuing its ongoing work with the Ministry of Infrastructure to support delivery of recommendations in *Community Hubs in Ontario: A Strategic Framework and Action Plan***

**OCSTA Concerns and Recommendations**

Improving the utilization of surplus school space is beneficial to municipalities, school communities and the province. Increased coordination of financial resources to support long-term operation of the community partnerships with school boards is required going forward.

OCSTA supports the government of Ontario's community hubs initiative and will continue to be involved in various working groups and discussions on how to facilitate the community use of underutilized school board facilities. There continues to be a need to adequately fund capital and operating costs related to community hubs.

In support of community hubs, OCSTA requests that the ministry of education consider that schools identified as community hubs be funded at 100% of their capacity and not the current per pupil funding model.

**Summary**

OCSTA supports the ministry of education's goals of creating a more collaborative process that better promotes student achievement and well-being and a process that better recognizes the impact of school closures on rural communities. However, we have concerns about the extension of timeframes for the PAR process and changing the required content of initial staff reports. We do support the creation of "toolkits" to facilitate more informed involvement of community groups in the PAR process and supporting better partnerships between school boards and local government and community groups. The ministry needs to be mindful, however, of the need for local Catholic school boards to maintain their decision making autonomy and flexibility when it comes to the final decisions related to accommodation and capital planning for their students.

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