Submission to

The Minister of Education

Partners in Excellence: Stability & Flexibility in Education Funding

December 10, 2019

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

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 Catholic school boards in promoting and protecting Catholic education.

Annually, OCSTA submits a brief to the government with recommendations for improvements to the funding of education. Recommendations are made on the basis that the education funding system in Ontario must respond to four essential principles:

> **Equity:** A funding formula must distribute education dollars equitably among all Ontario school boards and their students;
>
> **Adequacy:** The level of funding for education must be adequate to ensure quality education for today's students;
>
> **Autonomy/Flexibility:** The model must allow school boards the autonomy and flexibility in spending they require to achieve the distinctive goals of their system, and to meet local needs; and
>
> **Accountability:** The educational funding model must include mechanisms that ensure the appropriate degree of accountability for all parties and transparent processes and reporting mechanisms to support efficient and effective use of educational resources for students.

The recommendations contained in this brief were approved by the members of OCSTA and are important issues to the 29 Catholic District School Boards in our province. In some cases, they represent on-going concerns and in others describe recent priorities. We trust that the Minister of Education will consider our comments as part of the government's on-going commitment to consultation. As always, we would be pleased to meet with representatives of the Ministry to discuss any of the following items in more detail.

Catholic School Boards as Partners in Service Delivery

The OCSTA and Catholic school boards work closely with the Ministry of Education to develop education programs, budgets and curriculum that supports the legislative and regulatory requirements spelled out in the *Education Act*. We have enjoyed a positive working relationship for many years with all stakeholders in the education sector, including all Ontario political parties. Our school board trustees are the democratically elected representatives of the Catholic school system with responsibilities for:

- Establishing the education mission of the board;
- Developing school board policies that promote and protect Catholic education;
- Promoting the constitutional right of the Catholic school community to govern, manage and control publicly funded Catholic schools.

Our member school boards design and deliver Christ centered education programs to students. These boards are directly supported by 2.4 million Catholic ratepayers and have been an integral part of the history and fabric of our province for over 175 years.

Efficiencies at Catholic School Boards

OCSTA supports the government's objective of providing public services as efficiently as possible. Catholic school boards have historically and remain committed to being as effective and efficient as possible and have found significant cost efficiencies in the following areas:

1. Student transportation consortia;
2. Purchasing consortia;
3. Curriculum co-operatives;
4. Ontario Education Collaborative Marketplace (non-profit group that sources products and services for the education sector at price discounts);
5. Ontario Education Services Corporation (OESC) provides a central repository for resources and provides a host of services for school boards;
6. Ontario School Boards' Insurance Exchange (OSBIE) is a school board owned, non-profit insurance program, representing 78 school boards/school authorities.

These partnerships save Ontario taxpayers millions of dollars each year. The Auditor General states that "school boards have been increasing their use of group purchasing arrangements to acquire goods and services. We noted that the value of school board purchases acquired through supplier agreements negotiated by the Ontario Education Collaborative Marketplace increased from $10 million in 2010 to $112 million in 2016". (2017 Annual Report, Chapter 3, section 3.12 p.615-616).

Cybersecurity in School Boards

School boards throughout North America are facing increased threats from cybercriminals. According to Statistics Canada, incidents of cybercrime in Canada is increasing on average 23% each year and have almost doubled since 2014.
(https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=3510000101)
In the Auditor General's 2018 Annual Report, cyberattacks is identified as a growing threat to the security of Ontario's school boards' IT systems and related infrastructure. The report identifies cyberattacks as those security breaches

> ….both intentional and unintentional unauthorized access, use, manipulation, interruption or destruction of electronic information and/or the electronic and physical infrastructure used to process, communicate and/ or store that information. The biggest potential consequences of cyberattacks are disruption of operations and compromise of sensitive data. In extreme circumstances, cyberattacks can lead to damage to physical property and harm to human life.[1]

School boards host large amounts of personal information about students and board staff that can make them vulnerable to cyberattacks. This information could be used for identity theft or other forms of criminal activity that pose a significant risk for student and staff safety. It is paramount then that school boards have the resources, training and support required to develop cybersecurity systems to prevent cyberattacks. While our school boards support the general recommendations of the Auditor General in refining existing cybersecurity and risk management frameworks to reduce the school boards' risks, including cybersecurity awareness training to teachers and staff who have access to information technology, additional funding and support resources are necessary.

OCSTA Recommendations:

- **That the Ministry of Education ensure that boards have sufficient resources to develop and implement new cybersecurity policies and risk management frameworks;**

- **That the Ministry of Education expand the work of the Educational Computing Network of Ontario (ECNO) in building a shared service capacity for cybersecurity analysis and a shared security service for boards in Ontario;**

- **That the Ministry of Education expand the mandate of the Ministry's Broadband Modernization Initiative to fund and support cybersecurity training and awareness programs.**

[1] See chapter 3.12 p. 555 (http://www.auditor.on.ca/en/content/annualreports/arreports/en18/v1_312en18.pdf)

Economic Realities with Capital Projects/Funding for Retrofitting/Renovating Schools

Capital Costs Regarding School Construction:

Several factors are increasing the capital costs related to school construction in Ontario. They include:

- Increased tariffs on steel and aluminum;
- Rising interest rates;
- Increasing labour costs;
- Current construction tendering environment.

The current Ministry of Education Capital Priorities Funding Benchmark ("benchmark") does not recognize these increasing cost factors and is currently not an adequate standard for determining construction costs. The last formal review of the benchmark was in 2010 based on the analysis provided by the Expert Panel on Capital Standards. There is an urgent need to increase this benchmark to better align with current economic realities in the construction sector.

Recently, however, the Ministry announced a review of the Design Standard and Benchmark standards as part of the launch of the Capital Priorities Program (July 22, 2019 B17). OCSTA welcomes this review and believes addressing the increased costs associated with school construction is overdue.

In addition, in the context of retrofitting and renovating schools, funding has not been adequate to reduce the overall deferred maintenance backlog or provide sufficient funds for schools to replace or renew energy efficient building components or meet the heating and cooling costs of schools. The loss of the Greenhouse Gas Reduction Fund, for example, has compromised many energy efficiency retrofit projects in our schools. The review panel represents an opportunity to address this issue of deferred maintenance.

Capital Program Planning:

School boards benefitted from previous capital allocation programs in a number of ways. Paramount among these were the predictability and flexibility afforded to school boards to plan, on a district-wide basis, for the most effective and efficient means of addressing their various capital requirements.

The continuing needs of school boards include the following:

1. Old schools need to be re-built;
2. Some schools need to be consolidated due to declining enrolment and this often requires some capital upgrades;
3. Ultimately all schools will need to meet AODA accessibility standards, but there are no funds earmarked to address these needs; and
4. Even with overall decreases in enrolment, new schools need to be built in boards' growth areas that are sometimes far from existing schools.

The Ministry of Education now issues calls for applications for capital projects. Each of these calls gives the appearance of being a one-off call, with no certainty about whether or when there will be another. As a consequence, many boards have treated these calls as though there will be no other. A multiplicity of different projects, which under the previous system were streamed into specific capital programs, is now herded into a single funding stream. This makes it difficult for boards to assign priorities and difficult for Ministry officials to make decisions that are fair and equitable.

In addition, the current approvals process under this single funding stream for capital projects is administratively burdensome. Streamlining this process will go some distance to increasing efficiency and lessening the administrative burdens for school boards.

The current situation would also benefit from the creation of a multi-year program to address capital needs. This would add an element of predictability to the system and would make it possible for school boards to plan and clearly articulate those plans to the Ministry. It would also make it easier for the Ministry to review applications and make allocations in an orderly and transparent manner that reflect the priorities of both the Ministry and school boards.

OCSTA Recommendations:

- **That the Ministry of Education include key education stakeholders, including OCSTA, in the review panel regarding school construction capital benchmarks;**

- **That the Ministry of Education establish a multi-year capital funding process in order to restore the ability of both the Ministry of Education and school boards to plan for future capital needs;**

- **That the Ministry of Education streamline and provide increased local autonomy with regard to the capital approvals process for school boards to reduce administrative costs**.

Student Transportation

OCSTA appreciates the 10% increase in funding in the 2019-2020 GSN in respect of student transportation. Along with the "stabilization funding" to assist boards that are running deficits in their student transportation budgets, these two measures go some distance in addressing OCSTA concerns regarding transportation funding. In addition, OCSTA welcomes the government's commitment to review the existing student transportation funding formula and looks forward to participating in that process.

However, as OCSTA has noted previously, the structure and funding of student transportation is not based on the needs of a school board. The funding model is based on a "historical amount—each boards' 1997 spending level with annual adjustments for enrollment and inflation, and other minor adjustments. The most important influences on a school board's student transportation costs are not factored into the model such as enrollment density, geography, the number of special needs students and safety hazards.

In addition, the current competitive procurement process that school boards must follow in securing transportation has resulted in significant cost increases. In one case of a large urban transportation consortium, costs increased by roughly 20% that had to be absorbed by the affected school boards.

OCSTA Recommendations:

- **That the student transportation funding formula be restructured to reflect the actual needs of school boards;**

- **The competitive procurement process restore school board autonomy and flexibility in negotiating school bus operator contracts;**

- **That the Ministry of Education consult with OCSTA and other education partners in its on-going review of the student transportation funding formula**.

School Bus Driver Retention

School boards across Ontario are facing a shortage of qualified school bus operators. Various cost pressures such as the increases in the minimum wage and the guaranteed minimum daily hours for part-time workers negatively impact the operational costs for small and medium sized bus operators. This circumstance has resulted in delays and cancellations and generally inadequate transportation services for school boards which in turn negatively impacts student learning and well-being.

The previous government created a "School Bus Driver Retention Program" with an initial investment of a $60 million program of three direct bonus payments to bus drivers. These payments are designed to improve recruitment and retention rates of drivers through a financial incentive. However, the program has only just started and the results are mixed at this time.

OCSTA Recommendations:

- **That the Ministry of Education continue the School Bus Driver Retention Program;**

- **That the Ministry continue to review the results of this program in the broader context of restructuring the student transportation funding formula to meet the needs of school boards.**

21st Century Programs and Services for Students with Differing Abilities Including Diverse Learning Needs

Student Mental Health

Recent research from Centre for Addiction and Mental Health shows that roughly 328,000 children in grades 7-12 report moderate to serious psychological distress (2016). The Provincial Centre for Excellence in Children and Youth Mental Health state that schools need to develop comprehensive mental health supports and strategies to address the growing challenge. In addition, with the legalization of recreational use of cannabis, many school boards anticipate greater demands on mental health resources and supports, with the potential increased use of cannabis products and accompanying impacts on student mental health and well-being.

Catholic school boards have developed comprehensive mental health strategies to build awareness/organizational capacity, reduce stigma, use evidence based best practices for promotion and prevention strategies and partner with community organizations.

Rural and northern school boards face unique issues with fewer professional resources to support student mental health services. Boards need more resources to expand promotion and prevention programs at the elementary and secondary school level. Key program areas include suicide prevention, anxiety issues, behaviour problems and addictions.

OCSTA Recommendations:

- **That the Ministry of Education ensure funding for student mental health needs is equitable and sustainable for all students;**

- **That the Ministry of Education continue to support funding of a board level "Mental Health Lead" into the Grants for Student Needs structure. We also encourage the government to monitor and update the financial supports to boards to support local mental health initiatives;**

- **That the Ministry of Education continue to address the changing nature of student mental health needs as evidenced in the need for on-going enhanced prevention/intervention and aligned staff professional development supports for students with mental health challenges in transition.**

Special Education and Students with Autism Spectrum Disorder

Currently, the vast majority of Ontario's Catholic school boards are running deficits in meeting the educational, psychological and support needs of its exceptional students**.** More sophisticated diagnostic techniques related to Autism Spectrum Disorder (ASD), have resulted in significant increase in identifying this segment of the student population and led to increases in demand on special education services in boards.

Further, school boards are anticipating a significant increase in the number of ASD students entering the elementary grades over the course of the next year as the government's new autism program is fully implemented. The Ministry of Education has recognized this issue and provided

boards some increased funding to assist program planning, professional development and enhanced funding to hire applied behavior analysis therapists.[2] However, it is not clear that these enhancements will be sufficient to meet the challenges boards face with students with ASD.

Additionally, with the introduction of full-day kindergarten and various social factors, school boards must reallocate funding between different program areas to ensure students receive the educational services and supports they require. In many cases, school boards are having their special education grant reduced due to phased in changes to a key part of the grant structure. The "high needs" amount of the grant is being replaced by the Differentiated Special Education Needs Amount (DSENA). This new model is composed of the Special Education Statistical Prediction Model (SESPM), Measures of Variability Amount (MOV) and Base Amount for Collaboration and Integration. This new grant structure has redistributive funding impacts across all boards, some gaining and some losing funding.

School boards also face a range of other funding and program challenges in meeting the needs of special education students. For example, boards struggle to fund the specialized staff required to support students with complex behavioural needs. This may include staff support for student transportation to treatment programs and other support services. Another example is the operational costs associated with classroom design to accommodate students that require quiet spaces for learning and behavioural management interventions.

OCSTA Recommendations:

- **That the Ministry of Education establish a Special Education Working group, including OCSTA, with a stakeholder advisory board to review the adequacy of special education funding, including the structure of the DSENA;**

- **That the Ministry of Education review "needs based" funding models for high needs special education students to supplement the overall Special Education Grant structure;**

- **That the Ministry of Education continue to survey and monitor the situation with boards and provide program/financial support as required to ensure students with ASD can be assessed in a timely manner so boards can make the necessary accommodations.**

[2] These supports and resources were outlined in the March 11, 2019 Memorandum from the Deputy Minister of Education to Directors of Education. For details on OCSTA's concerns and recommendations, see the May 2019 submission to the Autism Consultation.

Information Technology

Funding in the area of technology is of paramount importance for school boards as technology is increasingly prevalent in curriculum delivery and linked to equity of access and student engagement. The Ministry of Education provided Technology Learning Funds (TLF) to school boards that was discontinued, leaving boards with infrastructure sustainability concerns. Over the last several years, school boards have made large-scale investments in their information technology due to aging hardware. In addition, boards are required to support maintaining and updating their suite of devices, including software, programs, and infrastructure.

The Grants for Student Needs (GSN) funding does not address technology needs for corporate functions, including financial, plant and maintenance work order systems, payroll systems, student information systems and human resource and employee relations reporting. Aligned to the province's focus on modernizing learning and modernizing classrooms, and with plans moving forward to mandate e-learning opportunities for secondary students, school boards would benefit from increased and stable funding to support the technology priorities of the government.

OCSTA Recommendations:

- **That the Ministry of Education provide boards with sustainable funding for information technology infrastructure through the GSN;**

- **That the Ministry of Education continue to consult with boards and OCSTA in respect of its Broadband Modernization strategy to ensure the IT needs of boards are factored into the strategy.**

Parent Reaching Out Grants

The Parent Reaching Out (PRO) Grants program provides funding to district school boards to lead projects with a focus on the identification and removal of barriers that prevent parents and families from participating and engaging fully in their children's learning.

This year (2019-20) the Ministry of Education is investing $1.25M in Parent Reaching Out Grants through the new Priorities and Partnerships Fund (PPF). School boards will receive a predetermined funding amount for parent engagement projects.

Changes to the program were made for the 2019-20 school year from an application-based funding model to an allocation-based grant provided to each district school board. This funding is intended to help district school boards address local needs and priorities connected to enhancing parent engagement.

Catholic school boards rely on these PRO grants to offset the costs of parent engagement events, programs and related initiatives. These are critically important for our Catholic educational community to foster parent engagement with our schools and to assist in our student's faith formation activities. OCSTA applauds the Ministry of Education in continuing to fund these PRO grants, while examining alternative funding options for boards to support parent engagement within the school community.

OCSTA Recommendations:

- **That the Ministry of Education continue to fund PRO grants and share examples of innovative initiatives.**

School Board Flexibility and Autonomy

Catholic district school boards in Ontario face increased budget pressures in the delivery of educational programs and services required by the Ministry of Education. As part of an expanding list of programs and services, the ministry continues to reduce boards' flexibility and autonomy in designing and delivering these programs that meet local needs and conditions. In addition, the ministry continues to reduce boards' flexibility in developing specific policies for students or implementing ministry policy directives making prudent financial decisions locally. The recent proposed revisions to the Pupil Accommodation Review Guideline is one example.

The ministry has also placed increased restrictions on how school boards spend their capital and operating funds. For example, the increased number of areas in the GSN that are "enveloped" reduces school boards' budget flexibility along with more targeted Program Priorities Funding (PPF). These restrictions on school boards have reduced their capacity to plan for, fund and operate specific education programs that serve the unique needs of their local constituents.

In essence, then, Ontario's publicly funded school boards require sufficient flexibility and autonomy to realize their distinct missions and unique mandates.

OCSTA Recommendations:

- **That the Ministry of Education develop new regulations/policies to restore school board autonomy and flexibility:**

    1. **In overall school board planning/program design and the implementation of ministry policy directives;**

    2. **Reduce restrictions (enveloping) on operating funds that decrease school board flexibility.**

Summary of Recommendations

Cybersecurity in School Boards

- That the Ministry of Education ensure that boards have sufficient resources to develop and implement new cybersecurity policies and risk management frameworks;

- That the Ministry of Education expand the work of the Educational Computing Network of Ontario (ECNO) in building a shared service capacity for cybersecurity analysis and a shared security for boards in Ontario;

- That the Ministry of Education expand the mandate of the Ministry's Broadband Modernization Initiative to fund and support cybersecurity training and awareness programs.

Economic Realities with Capital Projects/ Funding for Retrofitting/Renovating schools

- That the Ministry of Education include key education stakeholders, including OCSTA, in the review panel regarding school construction capital benchmarks;

- That the Ministry of Education establish a multi-year capital funding process in order to restore the ability of both the Ministry of Education and school boards to plan for future capital needs;

- That the Ministry of Education streamline the capital approvals process for school boards to reduce administrative costs.

Student Transportation

- That the student transportation funding formula be restructured to reflect the actual needs of school boards;

- The competitive procurement process restore school board autonomy and flexibility in negating school bus operator contracts;

- That the Ministry of Education consult with OCSTA and other education partners in its on-going review of the student transportation funding formula.

School Bus Driver Retention

- That the Ministry of Education continue the School Bus Driver Retention Program;

- That the Ministry continue to review the results of this program in the broader context of restructuring the student transportation funding formula to meet the needs of school boards.

21st Century Programs and Services for Students with Differing Abilities Including Diverse Learning Needs

Student Mental Health

- That the Ministry of Education ensure funding for student mental health needs is equitable and sustainable for all students;

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- That the Ministry of Education continue to address the changing nature of student mental health needs as evidenced in the need for on-going enhanced prevention/intervention and aligned staff professional development supports for students with mental health challenges in transition.

Special Education and Students with Autism Spectrum Disorder

- That the Minister of Education establish a Special Education Working group with a stakeholder advisory board to review the adequacy of special education funding, including the structure of the DSENA;

- That the Ministry of Education review "needs based" funding models for high needs special education students to supplement the overall Special Education Grant structure;

- That the Ministry of Education continue to survey and monitor the situation with boards and provide program/financial support as required to ensure students with ASD can be assessed in a timely manner so boards can make the necessary accommodations**.**

Information Technology

- That the Ministry of Education provide boards with sustainable funding for information technology infrastructure through the GSN;

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Parent Reaching Out Grants

- That the Ministry of Education continue to fund PRO grants and share examples of innovative initiatives.

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Ontario Catholic School Trustees' Association
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