



Ontario Catholic School Trustees' Association

Box 2064, Suite 1804
20 Eglinton Avenue West
Toronto, Ontario M4R 1K8
T. 416.932.9460 F. 416.932.9459
ocsta@ocsta.on.ca www.ocsta.on.ca

Patrick J. Daly, *President*
Michael Bellmore, *Vice President*
Nick Milanetti, *Executive Director*

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Honourable Stephen Lecce
Minister of Education
5th Floor, 438 University Ave,
Toronto, ON M7A 2A5
minister.edu@ontario.ca

Dear Minister Lecce,

Re: Accelerated Apprenticeship Pathway Consultation

On behalf of the Ontario Catholic School Trustees' Association ("OCSTA") we are pleased to provide you with our submission on the Accelerated Apprenticeship Pathway consultation.

The amendments to the *Education Act* made by the *Better Schools and Student Outcomes Act, 2023* (Bill 98) direct school boards to focus on delivering on the government's priority of addressing labour market needs for the skilled trades. Specifically, the amendments are intended to assist students to enter the skilled trades faster by enabling them to pursue an accelerated apprenticeship pathway starting in Grade 11. The Ministry of Education is proposing two models for consultation to implement the accelerated apprenticeship pathway.

The two models being proposed for consideration are:

***Equivalent Apprenticeship Learning** whereby the student remains a student of their school board while pursuing apprenticeship learning full time;

***Employer Supervised Apprenticeship** whereby the apprentice would no longer be a student of the school board and would be excused from attendance at school while pursuing apprenticeship learning full time.

The purpose of our submission is to share our concerns and make constructive recommendations in support of the government's objectives of addressing labour market needs for skilled trades. The thoughts and recommendations contained in this submission follow consultation with Ontario's 29 Catholic school boards.

Summary of OCSTA's Position on Accelerated Apprenticeship Pathways

Based on the input we received from a number of Catholic school boards, OCSTA believes the first model “Equivalent Apprenticeship Learning” best meets the needs of students, school boards as well as meeting the Ministry’s objectives. It allows students to remain connected to their school and Catholic faith community while engaging in valuable apprenticeship training. The model also ensures students can graduate high school at the same time as their peers which will enable them to pursue other post-secondary educational opportunities or continue in skilled trades apprenticeships.

In reviewing the models proposed, we are concerned that the “Employer Supervised Apprenticeship” model essentially cuts students’ connections with secondary schools after grade 10. We do not believe that this is in the best interests of students and have concerns that it does not respect our position as Catholic school boards as the faith formation of our students, geared toward the aspirations outlined in the Ontario Catholic School Graduate Expectations, is supported throughout their entire secondary school experience.

We believe it is important for students to stay connected with the resources Catholic schools provide—from faith formation, mental health supports to services and programs to support students with disabilities and special needs. The model also facilitates a students’ return to regular school programs if their apprenticeship training does not meet their needs or interests. The model will as well benefit employers that offer the apprenticeship training since they may not have the capacity to provide counselling and supportive services to assist students navigating the apprenticeship system.

Challenges with the Equivalent Apprenticeship Learning Model

The first model, though superior in our view to the second model of “Employer Supervised Apprenticeship”, raises a number of questions and possible challenges for school boards. For example, it is not clear if boards will be fully funded by the Ministry since students will be spending a significant amount of time away from school. Full funding is required to enable school boards to provide the support services, programs and learning opportunities to students pursuing apprenticeship training.

In addition, the model provides little information about the course requirements (such as grade 11, 12 Math and English) that serve as pre-requisites for students to be successful in many skilled trades. These sorts of course requirements should be integrated into the students’ training/apprenticeship program. Relatedly, the model does not identify a clear plan regarding new or modified graduation requirements for students pursuing an apprenticeship pathway.

The model also seems to assume that employers and unions will be flexible with new apprentices/students to enable them to have time away from regular work hours to participate in school co-curricular activities and other learning programs. This may present issues as well in securing student placements with various apprenticeship training options.

The model also has some logistical challenges that need to be considered. For example:

- **Scheduling and coordination of student’s credits** - Managing students' apprenticeship schedules alongside their educational commitments can be logistically challenging. Ensuring that students attend check-ins, complete necessary coursework, and meet both their academic and apprenticeship requirements requires careful scheduling and coordination.
- **Ability to maintain course/curriculum fidelity** – Importance of ensuring that any apprenticeship model maintains curriculum fidelity and the ability of schools to grant credits for apprenticeship training.
- **Administrative Burden** - Managing the administrative tasks involved in apprenticeship training can be cumbersome. Schools and boards must manage apprenticeship agreements, certifications, and student progress tracking. Additional funding will be required.
- **Supervision and Assessment** - Ensuring that students are progressing in their apprenticeships and meeting learning goals will require frequent supervision and assessment. This may add to the workload of school and board staff.
- **Health and Safety** - Ensuring the safety of students in apprenticeship programs will continue to be of paramount importance. Schools and boards must conduct site visits and enforce safety regulations to protect students while they gain practical experience. This will take considerable human resources and training.
- **Communication** - Effective communication between schools, boards, students, employers, and apprenticeship sponsors is crucial. Timely and clear communication can help address issues and ensure students stay on track.
- **Resource Allocation** - Adequate resources, both human and financial, are necessary for successfully implementing and maintaining this model. Schools and boards will require additional funding to budget for the associated staff, training, and materials required.

OCSTA Recommendations for Implementing the Equivalent Apprenticeship Learning Model

OCSTA prefers the Equivalent Apprenticeship Learning option model. It can be implemented using programs that currently exist such as cooperative education and can be supported through additional funding. To ensure successful implementation of the apprenticeship learning model, OCSTA makes the following recommendations/requests:

- Full funding for each school boards’ Supervised Equivalent Apprenticeship Learning (SEAL) Committee to support students;
- Regular and meaningful engagement with a lead teacher/board office staff to ensure learning goals and outcomes are achieved;
- The development of specific policies to address revised graduation requirements (for example, hours of Christian service, Religious education credits and French credits for French Immersion students);
- Accommodation policies to support students with disabilities, mental health and special education needs;

- Co-ordination mechanisms with the Ministry of Labour, Immigration and Skills Development to allow for the development of specific policies to support employers in developing apprenticeship opportunities;
- Assist boards in the development of health and safety plans including onsite site visits and enforce safety regulations to protect the well-being of students;
- Provide boards with all the necessary resources to develop communication plans with students, parents/guardians, employers and the public to ensure the successful implementation of the model.

Conclusion

On behalf of OCSTA, I want to thank you for providing us the opportunity to comment on the proposed models for developing an Accelerated Apprenticeship Pathway starting in Grade 11 under the legislative amendments introduced in the *Better Schools and Student Outcomes Act, 2023*. We commend you and fully support our shared goal of providing students with increased access to apprenticeship programs and skilled trades development. I would be pleased to meet with you and staff from the Ministry of Education to discuss this important matter.

If you have any questions or concerns, please do not hesitate to contact me directly at pdaly@ocsta.on.ca

Yours Very Truly,



Patrick J. Daly

cc. skillsdevelopmentandapprenticeshipbranch@ontario.ca