


Pre-Budget Submission to  
The Standing Committee on Finance and Economic Affairs

**January 17, 2024**



Ontario Catholic School  
Trustees' Association



 "If we love one another, God lives in us."  
(1 John 4:12)



## **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. We represent the 237 elected Catholic trustees who collectively serve on the 29 publicly funded English-language Catholic district school boards in Ontario. Together, these school boards educate approximately 575,000 students from junior kindergarten to grade 12 and tens of thousands of adults in continuing education programs.

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** publicly funded **Catholic education**.

Each year the OCSTA submits a Pre-Budget brief to the government with recommendations for changes in or improvements to the funding of education. Recommendations are thoughtfully made on the basis that the education funding system in Ontario must be in alignment with four essential principles:

**Equity:** A funding formula must distribute education dollars equitably and fairly among all Ontario school boards and their students;

**Adequacy:** The level of funding for education must be adequate to ensure quality education for students;

**Autonomy/Flexibility:** The model must allow school boards the necessary autonomy and flexibility in the spending required to realize the distinct mission of each of the publicly funded school systems, 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 measures to support efficient and effective use of educational resources.

The recommendations contained in this brief are important issues to the 29 Catholic District School Boards in our province. In some cases, they represent long-standing and on-going concerns and in others describe current priorities. We trust that our recommendations will be carefully considered as the government develops its budget for 2024-2025.

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## **Catholic School Boards as Partners in Service Delivery**

The OCSTA, on behalf of Catholic school boards, is committed to continuing to work closely with the government, Ministry of Education and other provincial education partners to develop programs, levels of funding initiatives and curriculum that support the legislative and regulatory requirements spelled out in the *Education Act* and support Catholic School Boards in their shared conviction to “place Christ and the teachings of the Catholic Church at the centre” of students’ learning experiences. We have enjoyed a positive working relationship for many years with all stakeholders in the education sector, including the current government and Ontario political parties. Catholic school trustees are the democratically elected representatives of the Catholic community. The boards they serve on are responsible for:

- Establishing the Christ centered mission of their school systems;
- Developing school board policies that promote and protect publicly funded Catholic education;
- Provide excellence in academics, co-curricular and faith formation opportunities for students;
- Developing programs in support of student and staff well-being;
- Establishing the Multi-Year Strategic Plan Annual Budget;
- Hiring Director of Education and other staff consistent with preferential hiring rights;
- Promoting the constitutional right of Catholic school ratepayers to govern, manage and control publicly funded Catholic schools.

Our member school boards develop and deliver Christ centered education programs to over 575,000 students and tens of thousands of adults in continuing education programs. 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**

Throughout their history, the OCSTA and our member boards have placed priority on providing public services as efficiently and effectively as possible. Catholic school boards remain committed to being good stewards of the resources available to them. They continue to seek cost efficiencies in a number of areas including;

1. Student transportation;
2. Purchasing consortia;
3. Curriculum co-operatives including membership in the Institute for Catholic Education;
4. Ontario Education Services Corporation (OESC) provides a central repository for resources and provides a host of services for school boards;
5. 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).

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As of 2022, the Ontario Education Collaborative Marketplace has increased school board participation to 90% with over \$364 spent on its various service offerings (2022, Annual Report OEEM p. 21).

**Funding to Fully Support Cost of Increases in Expenditures by Catholic Boards**  
**Re: Central Collective Bargaining**

OCSTA on behalf of our member boards and in partnership with the Crown is negotiating central collective agreements with their key education partners. It is anticipated that the contract costs related to salaries and benefits will increase beyond the amount included in the 2023-2024 GSN. In addition, the costs associated with legacy local collective agreements are significant and increasingly causing budgetary pressures, for example, the costs associated with long-term disability.

**OCSTA Recommendations:**

- **That the Ministry of Education ensures any and all the additional costs incurred by Catholic boards as a result of the new central collective agreements are fully funded;**
- **That the Ministry of Education provides Catholic school boards with the necessary funding to cover the costs of legacy local collective agreement language.**

**Sick Leave Costs**

The financial costs associated with the sick leave provisions contained within collective agreements has for a number of years placed significant financial pressure on school boards. Currently, all employee groups are able to access up to 11 days payable at 100% and up to 120 days payable at 90%, for a combined total of up to 131 paid days of sick leave per year. Cost increases associated with these provisions, combined with the indirect costs associated with replacement staff, occasional teachers, and increased administrative burdens associated with managing higher utilization, are leaving Catholic school boards struggling to meet their obligations. In addition, the resulting absenteeism has a significant effect on the instructional environment and safety for students, particularly when occasional teachers and support staff are unavailable.

While OCSTA continues to collect absenteeism data from its member boards, in 2016, SBCI conducted a study of 54 school boards (inclusive of certain Catholic, public, French Catholic and French public school boards) which highlighted the growth of average sick leave utilization across the sector as a whole and the associated financial magnitude of the problem. According to publicly available reports<sup>1</sup>, absenteeism rates have, on average, risen from less than 9 days in 2010-11 to over 11 days in 2015-16, with an associated cost of approximately \$1.0 billion. Over the 2010-11 to the 2015-16 period, sick leave utilization grew significantly in every employee category:

- Elementary teachers: 29% increase in sick days >11 days
- High school teachers: 26% increase in sick days <10 days
- Educational assistants: 41% increase in sick days 16 days
- Custodians: 23% increase in sick days >16 days

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<sup>1</sup> See <https://www.therecord.com/news-story/7316863-jump-in-teachers-sick-days-affecting-students-report-warns/?S=E>

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- Early childhood educators: \*37% increase in sick days >13 days

(\* period for ECEs ranged from 2013-14 to 2015-16)

In a more recent survey of 63 school boards in 2023 the SBCI found that absenteeism rates continue to increase from 12 days in 2017-2018 to 13 days in 2021-2022 for permanent employee groups representing over 6% of a boards payroll costs. The breakdown is an average across all 63 boards participating in the survey:

- Elementary teachers: 16.75 sick days
- High school teachers: 14.5 sick days
- Educational assistants: 22.1 sick days
- Early childhood educators: 20.7 sick days
- Custodians: 19.7 sick days.

There can be no debate that the significant growth in sick leave utilization is primarily linked to the sick leave plan modification that was introduced to the sector in 2012. The significance of the financial burden being placed on school boards and the negative impact on student learning as a result of increased staff absenteeism cannot be over-stated.

#### **OCSTA Recommendations:**

- **That the Ministry of Education support school boards in implementing effective attendance support and disability management programs;**
- **That the government work with Trustee Associations and school boards to negotiate meaningful changes to the central sick leave collective agreement provisions;**
- **That the government immediately increase and adequately fund costs associated with current levels of sick leave/absenteeism.**

#### **Cybersecurity in School Boards**

OCSTA acknowledges the work and final report of the Cybersecurity Modernization Strategy expert panel on cybersecurity to provide advice on cybersecurity threats to organizations in the public sector, including school boards.

Similar to other organizations, 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/tb11/en/tv.action?pid=3510000101>

In the Auditor General's 2018 Annual Report, cyberattacks are 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

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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.”<sup>2</sup>

School boards host enormous amounts of personal and sensitive 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 necessary resources, training and support required to develop cybersecurity systems to prevent cyberattacks. While Catholic 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 funding/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.**

**Learning Recovery Funding**

OCSTA acknowledges the additional funding the Ministry of Education has provided boards in responding to the unprecedented challenges of the COVID-19 pandemic. The additional resources for tutoring, mental health supports and other learning recovery programs remain key to ensuring our students recover from the disruptions caused by the pandemic.

However, addressing learning disruptions and loss caused by the pandemic and other factors requires a commitment to sufficient and multi-year funding. The learning recovery process and the mental health challenges facing students will require programs and services for the next number of years.

**OCSTA Recommendation:**

- **That the Ministry of Education commit to sufficient and multi-year funding in support of student mental health and of learning recovery programs and services.**

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<sup>2</sup> See chapter 3.12 p. 555 ( [http://www.auditor.on.ca/en/content/annualreports/arreports/en18/v1\\_312en18.pdf](http://www.auditor.on.ca/en/content/annualreports/arreports/en18/v1_312en18.pdf))



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### **Occasional Teacher/Support Staff Costs:**

As outlined in our comments with regard to sick leave costs, Catholic school boards are experiencing budgetary pressures regarding occasional support staff and teachers, a critical feature of supporting student achievement and well-being. This funding pressure places strains on a board's capacity to develop various educational programs and services, since funding from other program areas must be diverted to cover the costs of occasional teachers and support staff.

Catholic school boards are facing significant budgetary pressures in a number of areas—from special education to student mental health, transportation, cybersecurity to name a few—so diverting funding from one program to another is particularly challenging at the present time.

### **OCSTA Recommendation:**

- **That the Ministry of Education increase funding for occasional teachers and support staff positions via the GSN as soon as it is feasible.**

### **Indigenous Education**

OCSTA fully supports the government's ongoing commitment to enhancing Indigenous education for all students, including the Ministry's continuing to extend access to school board summer learning programming in 2022 and 2023 for First Nations students living on reserve. Through "active listening, prayer and right action", Catholic school boards remain committed to advancing healing, and Truth and Reconciliation with our Indigenous brothers and sisters.

The Indigenous Education Grant portion of the GSN provides funding for programs and initiatives to support the academic success and well-being of Indigenous students, as well as build the knowledge of all students and educators on Indigenous histories, cultures, perspectives and contributions.

In the 2023-2024 GSN, significant changes were made to the Indigenous funding model. As set out in the B Memo (2023: B04):

#### **Realignment of Funding into the Board Action Plan (BAP) Allocation**

The funding methodology for the BAP Allocation is being revised as part of the realignment within the Indigenous Education Grant to better support Indigenous education priorities.

A new Supplemental amount includes two components:

- NHS-Based Per-Pupil Component: Average Daily Enrolment (ADE) x estimated National Household Survey (NHS) percentage of enrolment that is Indigenous x Per-Pupil Amount (PPA) weighting factor x \$129.19
- Board Total Per-Pupil Component: ADE x \$36.98

#### **One-Time Realignment Mitigation Fund**

The Ministry is providing \$17.1 million to partially mitigate the impacts of the realignment within the Indigenous Education Grant for school boards that are facing a net funding reduction in the 2023–24 school year relative to the 2022–23 school year due to the changes outlined above. This transitional funding can support existing programming (excluding

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expenses related to school board administration and governance), recognizing that it takes time for school boards to adjust their cost structures. Each eligible school board's funding under the One-Time Realignment Mitigation Fund will be set out in the GSN regulation.

The new model for funding Indigenous Education has created distributional impacts on Catholic school boards with significant decreases in funding for some boards. OCSTA acknowledges the mitigation impact funding but cautions that it is insufficient given the fundamental change in how secondary Indigenous education is to be structured and funded.

#### **OCSTA Recommendations:**

- **That the Ministry of Education continue to consult with boards over the changes to the Indigenous Education grant structure to ensure the transitional funding is adequate;**
- **That the Ministry of Education ensure the structure of the Indigenous Education Grant provides Catholic school boards with the flexibility to use the funds to develop appropriate programs and services that serve local needs.**

#### **School Closures and Pupil Accommodation Reviews**

For the past several years, the Ministry of Education has had a moratorium on the school closures component of the pupil accommodation review process. This has now seriously impacted boards' capacity to plan and make the necessary adjustments to the number of schools to properly accommodate students. The moratorium also limits the breadth of programming and extracurricular options for students that are available in right sized schools, thereby diminishing their overall learning experience. Maintaining a number of underutilized schools also places a significant drain the financial resources that could be used to support programs in support of student learning or improvements to school facilities.

OCSTA acknowledges and appreciates that the "Capacity Building" funding that was part of the GSN in 2023-2024<sup>3</sup> that provides qualifying boards with excess capacity additional funding to do the following:

- ensure they develop capital plans to effectively right-size and manage excess capacity in their schools;
- undertake accommodation review processes;
- identify and develop potential facility partnership opportunities in underutilized schools that have been deemed by the school board as viable to support such arrangements;
- support the hiring of third-party mediation services to facilitate municipal/school board planning discussions and to support cooperative planning.

However, OCSTA recognizes that within the context of the moratorium on school closures in the pupil accommodation review process, boards will not have the ability to right size sufficiently excessive capacity in their schools. In addition, the funding does not cover board costs in maintaining excess capacity.

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<sup>3</sup> GSN 2022-23 Technical Paper p. 153.

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## OCSTA Recommendations:

- **That the Ministry of Education immediately lift the moratorium on the pupil accommodation review process to allow school boards the ability to reduce overall operational costs and better align resources to support student achievement and well-being;**
- **That the Ministry of Education ensure school operations funding grant allocations (top up funding) be adjusted to ensure that boards have adequate resources to maintain school buildings with adequate staffing levels until the pupil accommodation review process is reinstated.**

## Executive Compensation

OCSTA very much appreciates and values the faith-filled service Senior Administrative Leaders provide to Ontario's 29 Catholic district school boards. We have and continue to advocate for adequacy, fairness and equity in compensation for all staff working in Catholic school boards including the dedicated system leaders.

OCSTA and other education stakeholders met for over 1 year with a previous government (Ministry of Education) to create a framework that would lead to a fair and stable Executive Compensation program over a 3-year phase-in period. However, the implementation of the program did not occur in a fair, equitable or consistent manner.

Compensation compression with the current salary freeze makes it less attractive to seek positions of responsibility within the publicly-funded education system (e.g. Principal to Superintendent/Superintendent to Director). This compensation compression also negatively impacts attracting and retaining Senior Staff. Salary increases provided to all other school board staff over the past number of years has exacerbated the unfairness to senior staff and heightened the need for immediate action.

## OCSTA Recommendations:

- **That the Ministry of Education implement a retroactive salary correction on behalf of those boards who do not meet the bottom threshold of salary at the level their board is designated within the current regulatory structure. This would allow Superintendents and Directors of Education and other Executives included in the framework, to be paid at the minimum of their board level.**
- **That the Ministry of Education immediately rescind the regulation freezing Executive Compensation and provide school boards with the necessary retroactive funding to provide fair salary adjustments to senior staff.**

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## **Canada Pension Plan and Employment Insurance Costs**

As employers, Catholic School Boards are required to cover the costs associated with Employment Insurance (EI) and Canada Pension Plan (CPP) for each employee of the board. However, the funding provided to boards via the GSN is significantly lower than the costs of these programs. Thus, the costs of both the CPP and EI must come from other areas thereby negatively impacting the programs and services boards can offer to students. The funding benchmarks associated with these costs are in urgent need of updating.

### **OCSTA Recommendation:**

- **That the Ministry of Education immediately increase its benefit benchmarks to align with the employer-paid CPP and EI amounts remitted to the Canada Revenue Agency.**

## **Funding for Dignity of the Human Person, Equity and Anti-Black/Indigenous Racism Programs**

OCSTA commends the government and fully supports our shared commitment to removing systemic barriers including those related to race. Ontario's 29 Catholic school boards share this commitment and continue to place priority on ensuring that system, school and classroom practices reflect the diversity of students and staff. Anti-Black/Indigenous and other forms of racism and discrimination are contrary to Catholic social teaching and in conflict with our commitment to promote the dignity of the human person.

We believe that promoting the dignity of the human person and addressing Anti-Black/Indigenous and other forms of racism requires specific, targeted and sustainable efforts at all levels of our publicly funded education system. We know as well that such crucially important efforts require adequate, equitable and long-term funding. This funding would, among other programs/initiatives be used to support the regular collection and analysis of student and staff demographic data, community consultations as well as the development of appropriate professional learning, faith formation and mentoring resources.

### **OCSTA Recommendations:**

- **That the Ministry of Education provide sufficient funding/resources to enable Catholic school boards to develop targeted and comprehensive equity programs related to Anti-Black/Indigenous racism.**
- **That the Ministry of Education adequately fund and work with school boards to develop community outreach programs.**

## **Ontario Regulation 191/11 Accessibility for Ontarians with Disability Act (AODA)**

All school boards in Ontario have obligations to ensure their programs, services and infrastructure meet the requirements under the AODA and its various regulations and standards. Boards must develop multi-year accessibility plans in order to ensure compliance with the AODA and its regulations. Recently the Ministry of Seniors and Accessibility released draft recommendations on developing an Education Accessibility Standard that will affect technology, curriculum, school architecture, organizational barriers and other key program areas. These ongoing and new regulatory

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requirements will place significant cost pressures on boards as they strive to meet the 2025 timeline for implementing these requirements.

**OCSTA Recommendation:**

- **That the Ministry of Education provide specific and systematic funding necessary to meet AODA requirements in all areas covered by the regulations and standards until the year 2025.**

**Federal Carbon Tax Costs**

The federal carbon tax has become an increasingly challenging financial issue for Catholic school boards. The tax applies to all fossil fuels including natural gas. The tax increases each April and has increased substantially since 2019 from roughly 4 cents per cubic metre to over 12 cents in 2023. The tax is set to increase to over 32 cents per cubic metre by 2030.<sup>4</sup> Estimates from school boards show, for example, the carbon tax comprises between 10% and 30% of the total natural gas costs for boards. With natural gas costs set to rise significantly over the next several years, along with the cost of the tax itself, the financial impact on boards will become significantly more challenging.

For the 2023-2024 school year, the Ministry of Education has announced a 2% cost update to the non-staff benchmarks of the *School Operations Allocation* to assist school boards in managing the increases in commodity prices (i.e., electricity, natural gas, facility insurance, and other costs). However, estimates show that natural gas costs have increased by over 60% from 2019 to 2022.

**OCSTA Recommendation:**

- **That the Ministry of Education review the cost benchmarks related to energy and increase funding to school boards to offset the costs of the federal carbon tax.**

**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:

- Inflation increases;
- Increasing labour costs;
- Current construction tendering environment;
- Supply chain issues;
- Skilled trades shortages.

The current Ministry of Education Capital Priorities Funding Benchmark (“benchmark”) does not sufficiently recognize these rapidly 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

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<sup>4</sup> See <https://www.enbridgegas.com/en/residential/my-account/rates/federal-carbon-charge>

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the analysis provided by the Expert Panel on Capital Standards. There is an urgent and immediate 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 and Benchmark Standards as part of the launch of the Capital Priorities Program (July 22, 2019 B17). OCSTA welcomed the review and believes addressing the increased costs associated with school construction is overdue.

In the area of deferred maintenance, 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, ventilation 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***

We recognize and appreciate Minister Lecce's, the Ministry of Education and government's commitment to allocate capital funding equitably and fairly amongst the four publicly funded school systems. 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. Older schools need to be re-built;
2. Some schools need to be consolidated due to declining enrolment and this often requires 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. New schools need to be built in boards' growth areas.

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 and causes significant delay in design, planning and construction schedules. Streamlining this process will go some distance to increasing efficiency and lessening the administrative burdens for school boards. While acknowledging the good work of Ministry staff, the delays in the various required approval processes is causing increases in tender results as well as exacerbating the challenges associated with enrolment pressures. Particularly when Corporate Services board staff are focussed on the health and safety of students and staff and the good stewardship of resources, we would urge a freeze and where possible relaxation of capital reporting requirements.

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The current process 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 the OCSTA and other Trustee Associations, in a 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.**
- **That shared or multi use facilities be determined at the local Catholic school board level.**

#### **Student Transportation**

The OCSTA has advocated for a number of years for a new student transportation funding model. While the new funding model is a positive step in terms of allocating fair funding based on a common set of benchmarks, the introduction has not been without a number of significant challenges.

The model is creating some additional pressures for a number of our Catholic school boards. For example, many boards/consortia current, competitively procured contracts with bus operators have rate increases built-in that are tied directly to the consumer price index which was almost 6% in 2022. However, the new funding model does not address the specific escalation clauses transportation consortia have built into their agreements.

The new funding model also does not recognize passenger vehicles (minivans and taxis specifically) as a funded mode of transportation. Many of our Catholic boards use these smaller vehicles to transport special education students due to the nature of their disabilities and the efficiency and availability of smaller passenger transportation.

The funding model also contains weaknesses in the formulas used to determine bus operator wages. For example, the funding formula does not provide for the vacation percentage that must be paid to drivers on each pay (usually 4% of gross wages paid) or overtime paid to drivers. It also does not provide for “slack time” for drivers (cleaning, fuelling etc.) which places pressure on boards’ budgets in this area.

The new student transportation funding model as introduced has placed further pressure on boards’ transportation budgets and in a number of cases an increase in funding deficits.

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

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consortium, costs increased by roughly 20% and had to be absorbed by the affected school boards. It has as well reduced the number of bus operators and caused greater uncertainty with regard to the level of service.

#### **OCSTA Recommendations:**

- **That the Ministry of Education review the new student transportation funding model and establish short term transitional funding available to all boards in managing the new costs of the model;**
- **That the Ministry of Education revise the new funding model to include small passenger vehicles;**
- **That the Ministry of Education revise the new funding model to include inflationary costs for bus operators and adjust formulas for the calculation of driver wages and the driver recruitment amount;**
- **That the competitive procurement process be revised so as to restore school board autonomy and flexibility in negotiating school bus operator contracts.**

#### **Programs and Services for Student Mental Health and Differing Abilities Including Diverse Learning Needs**

##### ***Student Mental Health***

OCSTA acknowledges and welcomes the government's commitment to increase funding to address student mental health and well-being, given how students have suffered significantly in the context of the extended school closure in response to COVID-19 and a number of other factors. With the prolonged absence from school, the virtual learning context and limited social interactions due to health and safety concerns, boards have seen a significant increase in demand for their supports and services in this area. Catholic school boards appreciate recent enhancements in funding in the 2023-24 GSN, but urge that continued attention to and priority be placed in this important area.

In addition, 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 states that schools need to develop comprehensive mental health supports and strategies to address the growing challenge. In addition, with the legalization of the 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.

Out of a commitment to the mind, body and soul of their students, 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 often far 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.



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## OCSTA Recommendations:

- **That the Ministry of Education continue to review funding for student mental health and well-being so as to ensure that it is adequate, equitable and sustainable;**
- **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 and student well-being initiatives;**
- **That the Ministry of Education continue to address the changing nature of student mental health and well-being 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 Funding*

Catholic school boards remain committed to and are working hard to ensure the needs of their students with special education requirements are supported. However, providing the necessary level of support while ensuring health and safety presents unique challenges. For example, the need for specialized personal protective equipment for students and staff.

OCSTA acknowledges and welcomes recently announced changes to the Special Education Grant that moves funding to support programs for northern and rural children from the Priorities and Partnership Funding (PPF) into the GSN. This \$1.44 million in funding supports the coordinated assessment, consultation and treatment services to children and youth with physical, psychological and educational challenges in underserved rural and remote communities in Northern Ontario. Further, the transfer of \$6.1 million After School Skills Development Program that assists students with Autism from the PPF into the GSN is also welcome. These changes will provide boards more certainty for planning for the special education needs of their students.

However, the vast majority of Ontario’s Catholic school boards continue to run deficits in meeting the educational, psychological and support needs of their exceptional students. More sophisticated diagnostic techniques related to Autism Spectrum Disorder (ASD), for example, have resulted in a significant increase in identifying this segment of the student population and have led to increases in demand on special education services in boards.

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 has been replaced by the Differentiated Special Education Needs Amount (DSENA). This model is composed of the Special Education Statistical Prediction Model (SESPM), Measures of Variability Amount (MOV) and Base Amount for Collaboration and Integration. This grant structure has redistributive funding impacts across all boards, some gaining and some losing funding.

In addition, the Ministry is revising its Special Incidence Funding as indicated in the 2023-24 GSN B4 Memo:

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## **Interim Special Incidence Portion (SIP) Funding Approach**

The Special Incidence Portion (SIP) allocation is intended to support students with extraordinarily high needs who require more than two full-time staff to address their health and/or safety needs, and those of others at their school. In the 2023–24 school year, the ministry is undertaking a review to modernize the SIP Allocation and temporarily adjusting the SIP funding approach by using a formula to calculate the amount for each school board. Accordingly, SIP funding for each school board for 2023–24 is allocated based on the school board’s historical SIP funding amounts plus a growth rate applied. This funding approach to SIP will relieve school boards of administrative work required in the claims submission process.

This funding is very important for our Catholic School Boards, notwithstanding the challenges of accessing this funding due to the complex application process, so any change to this funding needs significant consultation and input from boards since there is a risk that this source of funds gets folded into other special education funding and gets redistributed.

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.

A current issue is also the challenges associated with timely psychoeducational assessments for students with various disabilities such as Fetal Alcohol Spectrum Disorder. Boards require more support to ensure they have sufficient human resources with the relevant training to conduct these assessments to ensure adequate programming for students.

### **OCSTA Recommendations:**

- **That the Ministry of Education establish a Special Education Working group, including OCSTA, to review the adequacy and flexibility of special education funding, including the structure of the DSENA and the SIP funding changes;**
- **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 current pandemic situation with boards and provide program/financial support as required to ensure students with special education needs can be provided psychoeducational assessments in a timely manner so boards can make the necessary accommodations.**

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## **Information Technology and Digital Resources**

Remote learning and the creation of virtual schools in response to the current COVID-19 pandemic has highlighted the challenges boards face in securing adequate information technology and digital resources. To promote equitable access to learning for students, boards are spending significant amounts to acquire digital resources, and as well providing the IT technical support for staff conducting virtual learning. Catholic school boards have purchased tens of thousands of laptops, iPads and other devices in support of those students who are learning virtually. We believe this trend will continue and place increased financial pressures on school boards.

Funding in this area 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 for secondary students, school boards require increased and stable funding to support the technology.

### **OCSTA Recommendations:**

- **That the Ministry of Education provide school boards with adequate and sustainable funding for information technology infrastructure through the GSN;**
- **That the Ministry of Education provide school boards with the funding associated with the cost of replacing devices that were transferred from schools to students (at home) learning remotely;**
- **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, especially northern and remote boards.**

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## **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. Over the past number of years, successive governments have introduced regulations/legislation that have significantly reduced school board flexibility. This loss in local autonomy and flexibility is of particular concern to Catholic school boards. We could cite numerous examples where Ministry of Education actions have reduced the flexibility Catholic school boards require to realize their distinct mission. The revisions to the Pupil Accommodation Review Guideline is one such example. We would as well call for a review of the *School Boards Collective Bargaining Act* to ensure school boards maintain the level of flexibility and autonomy they require.

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.

We cannot stress enough that Ontario’s publicly funded Catholic school boards require sufficient flexibility and autonomy to realize their distinct mission.

### **OCSTA Recommendations:**

- **That the Ministry of Education review regulations/policies with a goal of increasing 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;**
  3. **Increase local priorities funding to assist Catholic boards in meeting their distinctive mission to deliver Christ-Centred learning programs and opportunities for students.**

## **Funding for Unfunded Staff Positions**

The Ministry of Education has mandated that School Boards establish staff positions in areas such as equity, privacy/freedom of information and employment assistance. However, these positions do not include funding support. While OCSTA fully supports the services provided by board staff, additional funding is required to manage the costs of these positions.

### **OCSTA Recommendation:**

- **That the Ministry of Education establish a consistent funding structure in the GSN for board staff in newly mandated or priority area positions.**

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## **Equity Action Plan Funding**

OCSTA is fully committed to supporting the Ministry of Education's Equity Action Plan strategy. Ontario's education equity action plan outlines how school boards will identify and eliminate inequities in their schools. This involves working with parents, educators, principals, board staff, trustees and the community to ensure a fairer and more inclusive school environment for all students, educators and staff, regardless of race, religion, ethnicity, or any other factor related to individual identity.

As one Catholic school board notes in its 2022-2024 Equity Action Plan:

Our Equity Action Plan outlines what the [board] will do, with intentionality, at all levels of the organization to ensure that equity permeates in our classrooms, school communities, and central offices. In a Catholic learning community, equity and inclusion are a moral imperative. Our three-year Equity Action Plan demonstrates our commitment to ensure equity at all levels of our system, and is modelled on Ontario's Equity and Inclusive Education Strategy (2009) and Ontario's Education Equity Action Plan (2017). Ensuring equity stems from the fundamental principle that every student should have the opportunity to succeed personally and academically, regardless of background, identity or personal circumstances. While important in and of itself, equity is also necessary to realizing all other elements of our renewed vision, from achieving excellence, to promoting well-being, and enhancing public confidence in our education system. It is a critical component of our commitment to the success of every student and child in Ontario.

However, Catholic Boards do not receive any specific funding to assist in the realization of the long-term objectives of the equity action plan requirements.

### **OCSTA Recommendation:**

- **That the Ministry of Education include specific funding in the GSN for the purpose of implementing and maintaining the board requirements for Ontario's Education Equity Action Plan.**

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## Summary of Recommendations

### **Funding to Fully Support Cost of Increases in Expenditures by Catholic Boards Re: Central Collective Bargaining**

- That the Ministry of Education ensures any and all the additional costs incurred by Catholic boards as a result of the new central collective agreements are fully funded;
- That the Ministry of Education provides Catholic school boards with the necessary funding to cover the costs if legacy local collective agreement language.

### **Sick Leave Costs**

- That the Ministry of Education support school boards in implementing effective attendance support and disability management programs;
- That the government work with Trustee Associations and school boards to negotiate meaningful changes to the central sick leave collective agreement provisions;
- That the government immediately increase and adequately fund costs associated with current levels of sick leave/absenteeism.

### **Cybersecurity in School Boards**

- That the Ministry of Education ensure that boards have sufficient funding/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.

### **Learning Recovery Funding**

- That the Ministry of Education commit to sufficient and multi-year funding in support of student mental health and of learning recovery programs and services.

### **Occasional Teacher Costs**

- That the Ministry of Education increase funding for occasional teachers and support staff positions via the GSN as soon as it is feasible.

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## **Indigenous Education**

- That the Ministry of Education continue to consult with boards over the changes to the Indigenous Education grant structure to ensure the transitional funding is adequate;
- That the Ministry of Education ensure the structure of the Indigenous Education Grant provides Catholic school boards with the flexibility to use the funds to develop appropriate programs and services that serve local needs.

## **School Closures and Pupil Accommodation Reviews**

- That the Ministry of Education immediately lift the moratorium on the pupil accommodation review process to allow school boards the ability to reduce overall operational costs and better align resources to support student achievement and well-being;
- That the Ministry of Education ensure school operations funding grant allocations (top up funding) be adjusted to ensure that boards have adequate resources to maintain school buildings with adequate staffing levels until the pupil accommodation review process is reinstated.

## **Executive Compensation**

- That the Ministry of Education implement a retroactive salary correction on behalf of those boards who do not meet the bottom threshold of salary at the level their board is designated within the current regulatory structure. This would allow Superintendents and Directors of Education and other Executives included in the framework, to be paid at the minimum of their board level.
- That the Ministry of Education immediately rescind the regulation freezing Executive Compensation and provide school boards with the necessary retroactive funding to provide fair salary adjustments to senior staff.

## **Canada Pension Plan and Employment Insurance Costs**

- That the Ministry of Education immediately increase its benefit benchmarks to align with the employer-paid CPP and EI amounts remitted to the Canada Revenue Agency.

## **Funding for Equity, Anti-Black/Indigenous Racism Programs**

- That the Ministry of Education provide sufficient funding/resources to enable Catholic school boards to develop targeted and comprehensive equity programs related to Anti-Black/Indigenous racism.
- That the Ministry of Education adequately fund and work with school boards to develop community outreach programs.

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## **Ontario Regulation 191/11 Accessibility for Ontarians with Disability Act (AODA)**

- That the Ministry of Education provide specific and systematic funding necessary to meet AODA requirements in all areas covered by the regulations and standards until the year 2025.

### **Federal Carbon Tax Costs**

- That the Ministry of Education review the cost benchmarks related to energy and increase funding to school boards to offset the costs of the federal carbon tax.

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

- That the Ministry of Education include the OCSTA and other Trustee Associations, in a 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;
- That shared or multi-use facilities be determined at the local Catholic school board level.

### **Student Transportation**

- That the Ministry of Education review the new student transportation funding model and establish short term transitional funding available to all boards in managing the new costs of the model;
- That the Ministry of Education revise the new funding model to include small passenger vehicles;
- That the Ministry of Education revise the new funding model to include inflationary costs for bus operators and adjust formulas for the calculation of driver wages and the driver recruitment amount;
- That the competitive procurement process be revised so as to restore school board autonomy and flexibility in negotiating school bus operator contracts.

## **Programs and Services for Student Mental Health and Differing Abilities Including Diverse Learning Needs**

### **Student Mental Health**

- That the Ministry of Education continue to review funding for student mental health and well-being so as to ensure that it is adequate, equitable and sustainable;
- 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



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monitor and update the financial supports to boards to support local mental health and student well-being initiatives;

- That the Ministry of Education continue to address the changing nature of student mental health and well-being 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 Funding and Interim Special Incidence Portion (SIP) Funding Approach**

- That the Ministry of Education establish a Special Education Working group, including OCSTA, to review the adequacy and flexibility of special education funding, including the structure of the DSENA and the SIP funding changes;
- 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 current pandemic situation with boards and provide program/financial support as required to ensure students with special education needs can be provided psychoeducational assessments in a timely manner so boards can make the necessary accommodations.

### **Information Technology and Digital Resources**

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- 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, especially northern and remote boards.

### **School Board Flexibility and Autonomy**

- That the Ministry of Education review regulations/policies with a goal of increasing 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;
  3. Increase local priorities funding to assist Catholic boards in meeting their distinctive mission to deliver Christ-Centred learning programs and opportunities for students.

### **Funding for Unfunded Staff Positions**

- That the Ministry of Education establish a consistent funding structure in the GSN for board

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staff in newly mandated or priority area positions.

### **Equity Action Plan Funding**

- That the Ministry of Education include specific funding in the GSN for the purpose of implementing and maintaining the board requirements for Ontario's Education Equity Action Plan.

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