



Ontario Catholic School Trustees' Association

January 12, 2024

Honourable Stephen Lecce
Minister of Education
5th Floor, 438 University Ave,
Toronto, ON M7A 2A5

Dear Minister Lecce:

On behalf of the Ontario Catholic School Trustees' Association ("OCSTA") we are pleased to provide you with our comments/recommendations on the draft regulation "Director of Education Performance Appraisal" under Bill 98: *Better Schools and Student Outcomes Act, 2023* ("the Act") that amends the *Education Act*.

The thoughts and recommendations contained in this submission follow consultation with Ontario's 29 Catholic school boards. They also echo those made in our May 23, 2023 submission on Bill 98 as well as recommendations we made during consultation sessions with your staff and Ministry of Education officials.

As stated in the regulatory posting in the fall of 2023, the regulation would establish consistent requirements and a standardized process for Boards of Trustees to monitor and evaluate the performance of the Director of Education, including progress on the provincial education priorities for student achievement as set out in Ontario Regulation 224/23:

1. Achievement of Learning Outcomes in Core Academic Skills;
2. Preparation of Students for Future Success;
3. Student Engagement & Well-Being.

In addition, the regulatory posting indicates that a standardized process and mandatory standards for the Director of Education Performance Appraisal, as outlined in section 287.4 of the *Education Act*, includes the following:

- Evaluation cycle;
- Evaluation criteria;
- Methodology;
- Supports for a comprehensive and effective appraisal process including the use of external professional services;
- Rating system;
- Process following an unsatisfactory rating;
- Reporting/accountability.

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As we stated in our submission in May, 2023, OCSTA welcomes greater clarity in the process relating to Director Performance Appraisals. However, we have significant concerns about the Minister's involvement in this human resource process between a Catholic school board and their Director of Education. We support the establishment of a standardized performance template that incorporates the Catholic Leadership Framework, a uniquely Catholic appraisal process that respects our denominational rights and is guided by the Chair of a Catholic school board.

OCSTA strongly believes that Catholic school boards require the autonomy to develop a Director performance appraisal process that reflects their local needs and more importantly the distinctiveness of the role of a Director of Education in a Catholic school system. As we have previously indicated, we are concerned that aligning the goal setting and achievement review of a Director of Education of a Catholic school system with provincially established priorities does not meet the denominational rights/needs of a Catholic school board. While the provincial priorities could be considered during the performance appraisal process, they would not sufficiently capture the distinct characteristics/requirements of a Director of Education serving in a Catholic school system. The ability/flexibility of a Catholic school board to align/infuse those distinct characteristics and expectations so as to promote its Catholic Identity and the realization of its mission are essential.

In summary, we make the following recommendations;

- That the Ministry of Education ensure that the Provincial Priorities set out in Ontario Regulation 224/23 recognize the distinct denominational needs/rights of our Catholic school boards;
- That the Ministry of Education ensure any standardized process for the evaluation of Catholic Directors of Education include the Catholic Leadership Framework;
- That the Ministry of Education respect the autonomy of Catholic school boards when developing detailed and distinct criteria for evaluating the performance of Directors of Education to ensure local needs are met;
- That the Ministry of Education provide Catholic school boards with the resources to support in-service training for the Chair on conducting Director performance appraisals.

On behalf of OCSTA, I want to thank you for providing us with the opportunity to comment on the draft regulation regarding Director's Performance Appraisal under Bill 98: *Better Schools and Student Outcomes Act, 2023*. We trust that you will seriously consider our recommendations. Please let me know if you have any questions or would like to discuss this important matter with me.

Yours very truly,



Patrick J. Daly
President

cc: Rupinder Johal, Director, Strategic Policy and Education Workforce Branch