Submission to

The Minister of Finance

2025-2026 Prebudget Submission

"Placing Christ and the teachings of the Catholic Church at the centre" of students' learning experiences.

January 2025

Ontario Catholic School Trustees' Association

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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 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 enhancements and refinements to the funding of education in our province. Recommendations are 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 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 necessary autonomy and flexibility in the spending required to achieve the distinct 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.

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 urgent priorities. We trust that our recommendations will be carefully considered. As always, we would be pleased to meet with Minister Bethlenfalvy or representatives of the Ministry of Finance to discuss any of the following items in more detail.

Catholic School Boards as Partners in Service Delivery

The OCSTA, on behalf of Catholic school boards, remains committed to working closely with the Ministry of Education and other provincial education partners to develop programs, funding initiatives and curriculum that support the legislative and regulatory requirements spelled out in the *Education Act* and enable Catholic School Boards to "place Christ and the teachings of the Catholic Church at the centre" of their 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 collectively serve over 575,000 students. These boards are directly supported by 2.4 million Catholic ratepayers and have been an integral part of the fabric of our province for over 175 years.

Efficiencies at Catholic School Boards

Throughout its history, the OCSTA and our member boards have placed priority on providing programs and 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)

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 OECM 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 has negotiated central collective agreements with their employee group/union partners. It is anticipated that the contract costs related to salaries and benefits will increase beyond the amount included in the 2024-2025 Core Education Funding grant (formerly the GSN).

In addition, boards need to be **fully compensated** for any and all additional costs associated with Bill 124 Remedy Payments.

Finally, the costs associated with legacy local collective agreements are significant and increasingly causing budgetary pressures, for example, the costs associated with long-term disability and supervision.

OCSTA Recommendations:

- **That the Ministry of Education ensures that any and all the costs incurred by Catholic boards as a result of the 2022-2026 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;**

- **That the Ministry fully compensate Catholic school boards for any and all additional costs associated with Bill 124 Remedy Payments**.

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 many of our 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.

Additional costs boards face associated with Long-Term disability are also not adequately covered by the current funding provisions.

In a survey of 63 school boards in 2023 the SBCI found that absenteeism rates increased 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.

OCSTA welcomes the new attendance management program outlined in Policy and Program Memorandum 171 Attendance Support Programs (ASP). While this program will contribute to a consistent approach across all school boards, these types of programs alone are insufficient to address the magnitude of the increase in utilization of sick leave. The government must also be committed to

working with school boards and Trustee Associations to negotiate meaningful changes to the central sick leave collective agreement provisions and until that time adequately fund costs associated with current levels of absenteeism.

OCSTA Recommendations:

- **That in the next round of central bargaining, the government working with Trustee Associations make meaningful changes to the central sick leave collective agreement provisions a high priority;**

- **That the 2024-2025 Core Education Funding be increased so as to adequately fund costs associated with current levels of sick leave/absenteeism;**

- **That the government adequately fund costs associated with Long-Term Disability payments.**

Cybersecurity in School Boards

OCSTA welcomes the proposed legislation—Bill *194 ENHANCING DIGITAL SECURITY AND TRUST ACT, 2024* that will provide new tools to prevent and respond to cyber security threats and safeguard critical public services, while also strengthening safeguards for children's personal information and lay the foundation for the ethical use of artificial intelligence for school boards. We also want to acknowledge the work and final report of the Cybersecurity Modernization Strategy expert panel on cybersecurity that provided advice on cybersecurity threats to organizations in the public sector, including school boards.

At least 10 known cybersecurity incidents have occurred across nine school boards in Ontario since September 2019. Since 2018, 30% of Ontario school boards have made a claim to the Ontario School Boards' Insurance Exchange (OSBIE) in relation to a cyber-attack. The impact of cybersecurity attacks can be financially devastating to school boards with ransom payments on average over $1M, plus hundreds of thousands of dollars in payments to legal and cyber consultants to assist boards in managing the recovery. As such, cyber-attacks represent one of the highest operational risks for all Ontario school boards.

The impact of these cybersecurity breaches has included; leaked employee and student personal data, harmed day-to-day operation of schools, frozen human resource and payroll functions, and significant monetary losses through ransom payments, reparation, and system downtime.

School Boards seem to be viewed as targets for cyber-attacks because of the vast amounts of sensitive and confidential data they hold on employees and students and because they generally lack robust cybersecurity defenses and adequate incident response and disaster recovery plans. 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)

The Ministry of Education has recognized the need to increase the cybersecurity stance of all school boards throughout the province and has provided some funding to assist with efforts such as Multi-Factor Authentication, decentralized internet connections (Software-Defined Wide Area Networking: SD-WAN), next-generation firewalls (Secure Access Service Edge: SASE) and next generation anti-virus Endpoint Detection and Response (EDR) / Extended Detection and Response (XDR) solutions.

In addition, Catholic boards have been working with Cybersecurity Centre of Excellence, the Ministry of Education, Education Computing Network of Ontario to develop a long-term cybersecurity risk management framework and share best practices.

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 as directed by bill 194 and subsequent regulations;**

- **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 security service for school 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.**

Occasional Teacher/Support Staff Costs:

As outlined in our comments regarding sick leave costs, Catholic school boards are experiencing budgetary pressures regarding occasional support staff and teachers, an important 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, statutory benefits, transportation, cybersecurity to name a few—so diverting funding from one program to another is particularly challenging.

OCSTA Recommendation:

- **That the Ministry of Education increase funding for occasional teachers and support staff positions via Core Education Funding.**

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 Core Education Funding provides resources 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 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 and autonomy 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 seriously impacted school 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 drains financial resources that could be used to support programs in support of student learning, faith formation or improvements to school facilities.

OCSTA remains extremely concerned that within the context of the moratorium on school closures in the pupil accommodation review process, boards continue to be unable to make prudent decisions with regard to the most efficient and effective use of school facilities.

OCSTA Recommendations:

- **That the Ministry of Education immediately lift the moratorium on the pupil accommodation review process to provide school boards with the ability to reduce overall operational costs and better align resources to support student achievement, faith formation and well-being;**

- **That the Ministry of Education ensure that school operations funding grant allocations (top up funding) are adjusted to ensure that boards have adequate resources to maintain school buildings with adequate staffing levels until the pupil accommodation review process is reinstated**.

Canada Pension Plan and Employment Insurance Costs

For each school board employee, Catholic school boards contribute to the Federal Canada Pension Plan (CPP) and Employment Insurance (EI) programs to the Canada Revenue Agency (CRA). The current rate at which CPP and EI are funded to school boards by the Ministry of Education is **significantly** lower than the rate of remittance to the CRA. The difference in the amounts between what is received through the Core Education Funding for CPP and EI has increased dramatically in recent years. This difference is thus fully funded from other areas of school board budgets. This gap will continue to grow as the CPP and EI continue to increase thus negatively impacting the programs and services boards can offer to students.

The issue of underfunding in the benefits benchmark is a prime example of the necessity for the annual Core Education Funding (formerly the Grant for Student Needs) to be adjusted/increased to reflect the inflationary pressures experienced by Catholic school boards.

Further, Pay Equity requirements for our Catholic boards are not covered and impose significant costs on boards.

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;**

- **That the Ministry review the structure of Pay Equity requirements and compensate boards fully for their costs.**

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 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.

In the area of deferred maintenance, funding has not been adequate to reduce the overall maintenance backlog or provide sufficient funds for schools to replace or renew energy efficient building components. The loss of the Greenhouse Gas Reduction Fund, for example, has compromised many energy efficiency retrofit projects in our schools.

Capital Program Planning

We recognize and appreciate the Ministry of Education and government's commitment to allocate capital funding equitably and fairly amongst the four publicly funded school systems as well as the 2024 historic capital funding announcement. 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;
4. New schools need to be built in boards' growth areas; and
5. Increase flexibility with regard to capital construction and purchase of sites.

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.

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.**

Temporary Accommodation Funding

Temporary Accommodation funding is a static amount distributed on a pro rata basis across the province based on each board's temporary accommodation requirements. This allocated amount has not increased for several years, yet local and provincial needs have changed substantially due to increased enrolment in high-development areas and significant construction cost increases.

In fact, a number of Catholic School Boards have seen a reduction in their Temporary Accommodation funding in this year's Core Education Funding. For example, one mid size board saw its funding decrease from $751,607 in 23-24 to $538,105 in 24-25, despite their need to increase the number of portable classrooms. In addition, the same board saw portable costs increases similar to all construction based on supplier costs, labour and materials of roughly 30%. Another large board in the GTA has seen costs increase upwards of 50% on the repairs and refurbishment of existing portables. Costs for new portables for this board have increased from $80,000 to over $135,000.

Boards outside the GTA report even higher costs for portables. The current pricing for a portable supplied and set-up is about $150,000. This does not include the site preparation (asphalt pad) or the electrical, fire alarm and wireless connections. These additional costs push the overall cost to approximately $200,000. The issue of underfunding in the Temporary Accommodation Allocation of Core Education Funding is another example of the urgent need to address inflationary pressures experienced by Catholic school boards.

OCSTA Recommendation:

- **That the Ministry of Education review the structure of the Temporary Accommodation funding model to ensure fairness in the allocation of funding;**

- **That the Ministry increase its Temporary Accommodation Allocation to address the actual costs and the inflationary pressures facing our Catholic school boards.**

Student Transportation

OCSTA appreciates the changes made to the student transportation funding model in this year's Core Education Funding. The changes reflect some of the feedback provided by the sector in the first year of implementing the model introduced for the 2023/24 school year.

Having said that, the model continues to add additional pressures for a number of 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 continues to exceed the Ministry's recognition of inflation. The new funding model does not address the specific escalation clauses transportation consortia have built into their agreements that were settled and agreed to in the past.

The funding model also contains flaws 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. The introduction of a new enveloping requirement encompassing student transportation will need to be monitored closely for its negative impact on the flexibility and autonomy of boards to provide necessary service to students.

The current competitive procurement process that school boards must follow in securing transportation continues to result in significant cost increases and a concentration of fewer and fewer companies providing transportation services.

The increased reporting and administrative requirements to support the necessary data submissions and public reporting with regards to student transportation is an added burden that should be reflected more explicitly in the funding model within the Local Priorities component. The ability of the Ministry of Education to keep the student transportation funding formula current and appropriate necessitates up-to-date and accurate data submissions. Additionally, local community expectations of reporting and communications regarding transportation has changed the nature of the administrative burden for consortia and boards and should be funded adequately.

OCSTA Recommendations:

- **That the Ministry of Education carefully review the student transportation funding model and establish short term transitional funding available to school boards in managing the new costs of the model;**

- **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;**

- **That the Ministry increase funding within the Local Priorities component to reflect the additional costs associated with the new reporting and date requirements**.

Differentiated Funding for Online Learning*:*

The existing funding model differentiates between online and in-person learning by setting funded average class sizes at 30:1 for online learning and 23:1 for in-person learning. For the 2024-25 academic year, it is assumed that approximately 32.5% of secondary Average Daily Enrolment (ADE) will be comprised of students taking one online credit.

The current funding formula does not reflect the actual enrollment in online courses and fails to account for the additional supervision required. Specifically, the funding model does not consider students who opt out of online credits, nor does it provide funding for the supervision of students who are onsite while taking online classes.

OCSTA Recommendation:

- **That the Ministry of Education urgently review and revise the funding formula to better align with the realities of student enrollment and supervision needs in online learning environments.**

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

Student Mental Health

OCSTA acknowledges 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. 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 supports and services in this area. Catholic school boards appreciate recent enhancements in funding in the 2024-2025 Core Education Funding, 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 approximately 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 are in need of additional 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 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 ensuring that the needs of students with special education requirements are supported. However, providing the necessary level of support while ensuring health and safety presents unique and ever increasing challenges. For example, the need for specialized personal protective equipment for students and staff.

The vast majority of Ontario's school boards continue to run deficits in meeting the educational, psychological and support needs of 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 significant increases in demand on special education services in boards.

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.

OCSTA acknowledges the updates to the Special Education Statistical Prediction Model with new 2021 census data, that will be phased in over several years. We also appreciate the increased funding in the restructured SIP and SEA allocations for students with extra-ordinary special needs.

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 additional 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 accelerate the phase in the use of 2021 census data from five years to three years in order to facilitate a more accurate funding model;**

- **That no school board experience reduced funding as a result of the use of updated census data.**

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

Speech & Language Pathologist Funding

Data gathered from the Right to Read Inquiry shows an urgent need to improve reading and other student achievement outcomes in Ontario. Literacy specialists and teachers from across the province recognize the importance of speech and language assessments as outlined in the Inquiry. As a result of OHRC Right to Read Inquiry, the Ministry of Education has provided temporary funding for professional assessments such as psycho- education assessments or assessments completed by a Speech and Language Pathologists. However, Speech and Language Pathologists needed for these crucial assessments are in short supply.

Part of the difficulty in attracting Speech and Language Pathologists to the education sector is the temporary nature of their contracts. The funding provided to school boards via the Responsive Education Programs and Funding for External Partners (formerly Priorities and Partnership Funding) for these professionals is only temporary. As a result, many Speech and Language Pathologists prefer to remain in private practice where employment is more stable and secure.

OCSTA Recommendation:

- **That the Ministry of Education move funding from the temporary Responsive Education Programs and External Partners for Speech and Language Pathologists into the Core Education Funding (formerly Grants for Student Needs) that will allow schoolboards to hire full-time permanent positions for Speech & Language Pathologists.**

Information Technology and Digital Resources

To promote equitable access to learning, school boards are spending significant amounts to acquire digital resources, and as well providing the IT technical support for staff conducting virtual learning. 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 information technology due to aging hardware. In addition, school boards are required to support maintaining and updating their suite of devices, including software, programs, and infrastructure.

The Core Education funding does not adequately 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 with 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 additional and sustainable funding for information technology infrastructure through the Core Education Funding;**

- **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 strategy to ensure the IT needs of boards are factored into the strategy, especially northern and remote boards.**

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 Core Education Funding that are "enveloped" reduces school boards' budget flexibility along with more targeted Responsive Education Program Funding (formerly 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.

Changes introduced in the 2024-2025 Core Education Funding have only caused to exacerbate the impact associated with loss in flexibility and autonomy. 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 to increase 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 distinct mission to deliver Christ-Centred learning programs and opportunities for students.**

Equity Action Plan Funding

OCSTA is fully committed to promoting the dignity of the human person and support 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.

OCSTA Recommendation:

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

Safe Schools: Violence Threat Assessment Training

The increase in school violence incidents as reported by the Ministry is disrupting learning and working resulting in a negative effect on students, staff, schools, and the broader community.

The issue of violence in schools is of growing concern. Recent surveys by Teacher Federations indicate that roughly 30% of education staff have experienced a violent incident.[1] One survey of a large school boards indicates that roughly 64% of elementary staff have experienced a threatened, attempted or actual physical assault in their school.[2]

The causes of violence targeting education staff and students is highly complex and is not limited to students with significant behavioural challenges or special education needs. The mental health challenges facing students and staff are a significant contributing factor to this circumstance. Other factors involve limited funding for violence prevention, targeted mental health support, qualified teaching assistants and guidance counsellors.

The *Safe Schools Act*, 2000, S.O. 2000, c.12-Bill 81, in effect since June 23, 2000, is an *Act* to increase respect and responsibility, to set standards for safe learning and safe teaching in schools.

Schools must be places where everyone feels welcome, safe, and respected. The *Keeping Our Kids Safe at School Act*, in effect since February 1, 2010, affects how all school boards address incidents at school. All school boards in Ontario must develop a violence prevention policy that meets the requirements of *the Safe Schools Act* defining responses to threats of harm, unsafe situations, and violence in a multidisciplinary manner using a multidisciplinary team of specially trained staff internal and external to school boards.

A threat assessment and intervention process are generally used by school boards across the province to respond to threats of targeted violence and are typically integrated with other emergency response procedures designed to address safety and well-being. School boards liaise with community partners to collaborate in the threat assessment and intervention response as these situations are usually complex and a collaborative assessment and intervention plan is important to reduce the risk of target violence in the short-term and prevent youth violence over time. A threat assessment and intervention process are important to ensure the safety of students, staff, parents/guardians/caregivers and other members of the community. It also ensures an effective and timely response when there is a threat of targeted violence and assists boards to understand the factors that contribute to a situation where an individual makes threats to harm others.

[1] See the survey from OSSTF from June 6, 2024 https://www.osstf.on.ca/en-CA/news/startling-osstf-feeso-school-violence-survey-results-reveal-need-for-emergency-funding.aspx;

[2] see Toronto Catholic Elementary Teachers Survey May 28, 2024
https://www.thecanadianpressnews.ca/globenewswire_press_releases/escalating-school-violence-disrupts-student-learning/article_68c3b998-1532-564c-8dcc-e1b609a210fa.html

At the present time, the cost of specialized trauma-informed training is not manageable nor sustainable for schools given the increasing number of violent incidents and the number of personnel needing release time to be trained throughout the school system.

OCSTA Recommendation:

- **That the Ministry of Education invest additional "safe schools" funds for the specialized trauma-informed training to help reduce the risk of violence in schools and promote the safety of students and staff.**

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 that any and all the costs incurred by Catholic boards as a result of the 2022-2026 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;

- That the Ministry fully compensate Catholic school boards for any and all additional costs associated with Bill 124 Remedy Payments.

Sick Leave Costs

- That in the next round of central bargaining, the government working with Trustee Associations make meaningful changes to the central sick leave collective agreement provisions a high priority;

- That the 2024-2025 Core Education Funding be increased so as to adequately fund costs associated with current levels of sick leave/absenteeism;

- That the government adequately fund costs associated with Long-Term Disability payments.

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 as directed by bill 194 and subsequent regulations;

- 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 security service for school 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.

Occasional Teacher Costs

- That the Ministry of Education increase funding for occasional teachers and support staff positions via Core Education Funding

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 and autonomy 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 provide school boards with the ability to reduce overall operational costs and better align resources to support student achievement, faith formation and well-being;

- That the Ministry of Education ensure that school operations funding grant allocations (top up funding) are adjusted to ensure that boards have adequate resources to maintain school buildings with adequate staffing levels until the pupil accommodation review process is reinstated.

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;

- That the Ministry review the structure of Pay Equity requirements and compensate boards fully for their costs.

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.

Temporary Accommodation Funding

- That the Ministry of Education review the structure of the Temporary Accommodation funding model to ensure fairness in the allocation of funding;

- That the Ministry increase its Temporary Accommodation Allocation to address the actual costs and the inflationary pressures facing our Catholic school boards

Student Transportation

- That the Ministry of Education carefully review the student transportation funding model and establish short term transitional funding available to school boards in managing the new costs of the model;

- 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;

- That the Ministry increase funding within the Local Priorities component to reflect the additional costs associated with the new reporting and date requirements.

Differentiated Funding for Online Learning

- That the Ministry of Education urgently review and revise the funding formula to better align with the realities of student enrollment and supervision needs in online learning environments.

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 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 accelerate the phase in the use of 2021 census data from five years to three years in order to facilitate a more accurate funding model;

- That no school board experience reduced funding as a result of the use of updated census data.

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

Speech & Language Pathologist Funding

- That the Ministry of Education move funding from the temporary Responsive Education Programs and External Partners for Speech and Language Pathologists into the Core Education Funding (formerly Grants for Student Needs) that will allow schoolboards to hire full-time permanent positions for Speech & Language Pathologists.

Information Technology and Digital Resources

- That the Ministry of Education provide school boards with additional and sustainable funding for information technology infrastructure through the Core Education Funding;

- 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 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 to increase 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 distinct mission to deliver Christ-Centred learning programs and opportunities for students.

Equity Action Plan Funding

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

Safe Schools: Violence Threat Assessment Training

- That the Ministry of Education invest additional "safe schools" funds for the specialized trauma-informed training to help reduce the risk of violence in schools and promote the safety of students and staff.

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NOTES

Ontario Catholic School
Trustees' Association

Suite 1510, 2 Sheppard Avenue East, Toronto, Ontario M2N 5Y7
Tel: 416-932-9460 Fax: 416-932-9459 Email: ocsta@ocsta.on.ca Website: www.ocsta.on.ca