



2019-20 Education Funding Engagement Guide Consultation: Final Response

To: Finance, Budget and Enrolment Committee

Date: 23 January, 2019

Report No.: 01-19-3568

Strategic Directions

- Allocate Human and Financial Resources Strategically to Support Student Needs

Recommendation

It is recommended that the 2019-2020 Education Funding Engagement Guide Consultation - Final Response be received.

Context

Appendix A represents the Toronto District School Board's final response to the Ministry of Education's (EDU) invitation to provide input on education funding for the upcoming 2019-2020 school year. The following themes were commented on:

- a) Efficient Price Setting;
- b) Outcomes-Based Funding;
- c) Accountability and Value-for-Money; and
- d) Other Education Funding Efficiencies.

The EDU also accepted feedback on other topics that school boards felt were important to provide feedback on for consideration. The TDSB's submission included comments on transportation, renewal funding backlog and education development charges. The TDSB's final response was submitted to the EDU on 14 December 2018.

Staff attempted to obtain copies of other boards' responses and as of report submission, the following responses have been received:

- the Council of Senior Business Officials (COSBO) – Appendix B;
- York Region District School Board – Appendix C; and
- Toronto Catholic District School Board – Appendix D.

Action Plan and Associated Timeline

Not applicable.

Resource Implications

Not applicable.

Communications Considerations

The final response has been posted to the 2019-2020 budget section on the Board's website.

Board Policy and Procedure Reference(s)

Not applicable.

Appendices

- Appendix A: Response: Toronto District School Board - Education Funding Engagement Guide 2019-2020
- Appendix B: Council of Senior Business Officials (COSBO) – Consultation: 2019-2020 Grants for Student Needs, December 2018
- Appendix C: Response: York Region District School Board
- Appendix D: Response: Toronto Catholic District School Board

From

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Response: Education Funding Engagement Guide 2019-2020

Introduction

The Toronto District School Board (TDSB) is Canada's largest and most diverse school board. Every day, we welcome more than 246,000 students to 582 schools across the City of Toronto. We also serve more than 140,000 life-long learners in our Adult and Continuing Education programs.

It is because we are the largest and most diverse school board in the country, that we have a unique set of needs when it comes to what is required to best support our students and communities.

Our new Multi-Year Strategic Plan consists of five pillars. Each of these pillars represents our evidence-based decision making. Each pillar has measurable outcomes that are confirmed through our student census data, student academic achievements, and strategic allocation of resources:

1. [Transform Student Learning](#) – We will have high expectations for all students and provide positive, supportive learning environments.
2. [Create a Culture for Student and Staff Well-Being](#) – We will build positive school and workplace cultures that support mental health and well-being — free of bias and full of potential.
3. [Provide Equity of Access to Learning Opportunities for All Students](#) – We will ensure that all schools offer a wide range of programming that reflects the voices, choices, abilities, identities and experiences of students.
4. [Allocate Human and Financial Resources Strategically to Support Student Needs](#)
We will allocate resources, renew schools, improve services and remove barriers and biases to support student achievement and accommodate the different needs of students, staff and the community.
5. [Build Strong Relationships and Partnerships Within School Communities to Support Student Learning and Well-Being](#) – We will strengthen relationships and continue to build partnerships among students, staff, families and communities that support student needs and improve learning and well-being.

Measuring our success is critical to know we are making a difference for students. Our expectation – and our goal – is that everyone improves. We expect to:

- Close the achievement and well-being gaps while keeping expectations high for all students because we are providing access to the programs, resources and learning opportunities that students require, while removing systemic barriers that may exist for them.
- Transform student learning to ensure students improve in literacy and math and strengthen essential skills including critical thinking, creativity, collaboration, communication, citizenship and character (known as global competencies).
- Increase engagement of students, staff, parents and communities because we are honouring voice, experience, identity and expertise, and we are willing to adjust our directions and plans because of this engagement.

Real change happens in the classroom and with this coordinated and strategic approach, we are confident that each and every student will be successful.

An example from our Multi-Year Strategic Plan are the Action Plans dedicated to Special Education, wherein we are committed to outcome-based planning to support our most vulnerable students. The goals include, each school will welcome all students, providing an open and inclusive learning environment that recognizes that most students can be served effectively within their community school. This includes continuing to provide intensive support programs for students with more specialized learning needs. Strengthening collaboration with parents and engage effectively in the decision making process regarding their child's program, placement and well-being. Increased employment opportunities and outcomes for all students with Low Incidence Exceptionalities (Intellectual Disabilities, Physical Disability, Low Vision, Deaf and Hard of Hearing, and Health/Medical).

In addition to answering the Ministry's questions, we would like to focus on the following areas of interest for the TDSB:

1. Transportation;
2. Renewal Funding Backlog; and
3. Education Development Charges.

1. Transportation

Transportation service in many urban school boards is an increasing challenge. In the City of Toronto, the service challenges are compounded by traffic congestion and road construction.

The driver shortage issue experienced in September 2016 continues to be a concern of boards as carriers struggle to maintain a sufficient number of core drivers as well as spare drivers to cover absences for vacation, illness, religious observance and other unexpected and planned absences. The Transportation Unit continues to leverage technology to improve the level of service for our communities. Parents have high service expectations and the demand for service is outstripping the supply of available drivers. School boards that try to amend their current model of service levels face incredible push back from parents who rely on the service.

In the absence of provincial funding benchmarks for transportation, school boards have no guidance to support a change in service expectations and the inequity among coterminous boards is left unaddressed because boards will continue to use transportation as a means to compete for students. In addition, the TDSB is advocating that transportation for students with special needs be identified and funded separately. The TDSB is the largest provider of transportation services for students with special needs in the province. These students are our most vulnerable students, with the greatest service needs and for whom the cost per pupil is appreciably higher than other standard transportation.

In order to address retention of drivers, the Ministry implemented a driver retention bonus based on service benchmarks. With this bonus set to expire and nothing yet offered to attract and retain drivers, it is of concern to the industry, as well as the Boards, that we may face a larger than normal number of retirements and/or staff movement to other jobs with steadier work conditions.

The review of transportation services and funding started two years ago, still has not reported out on its findings.

2. Renewal Funding Backlog

The province has provided multiple years of additional funding for school repairs. We are appreciative to the province for this funding, which has allowed us to address

emergency issues in our schools. Unfortunately, it has not been sufficient to decrease the repairs backlog.

Currently, the TDSB faces a staggering \$3.9 billion repair backlog as a result of years of inadequate funding. If additional funding provided over the last 3 years (SCI) is discontinued and/or reduced, and no additional funding is provided, we estimate that the TDSB's renewal repairs backlog will grow approximately \$0.6 billion per year.

It is imperative that the province commit to providing predictable and sustainable funding for school repairs so that the TDSB can continue to implement our long-term plan for renewal, lower our current \$3.9 billion repair backlog and modernize our schools. Current industry standards are that 2 to 4%¹ of the replacement value of buildings should be budgeted for renewal expenditures. Costs in high density urban boards for maintenance and construction work are significantly higher than either suburban or rural boards and should be taken into consideration in establishing construction benchmarks.

3. Education Development Charges

The TDSB is advocating for access to Education Development Charges (EDCs) as a source of revenue to sustain our ability to make adequate investments in our schools as development continues in the city.

As you know, school boards must meet several conditions before being eligible to require developers to pay EDCs. The first condition is that the board must show that the number of students that it needs to accommodate is larger than the space available. The TDSB does not meet this condition because there is surplus space across the system. However, city intensification plans mean that many neighbourhoods are growing and putting additional pressure on schools in these areas that are already full.

In addition, current legislation mandates that EDCs can only be used for the purchase of land to support schools in growth areas, not to support the cost of building new schools or renovating existing schools. We advocate for a change in this regard as well.

¹ Reversing the Cycle of Deterioration in the Nation's Public School Buildings, Council of the Great City Schools, October 2014.

Toronto City Planning figures indicate that approximately 290,000 residential units are in the review process or under construction, which could generate EDC revenue of over \$300 million in funding for school improvements. Toronto is one of Canada's fastest growing cities. Overlooking the use of EDCs to fund badly needed school repairs is a lost opportunity. We once again ask the Ontario government to amend the EDC regulations to ensure that the TDSB can capture this revenue and use it to build and repair schools.

TDSB's Response to Ministry of Education Consultation Questions

The *Education Act* provides the authority and responsibility for student achievement and well-being to school boards. The TDSB accepts this responsibility and works with its communities to develop programs and supports to achieve these goals with the available funding provided by the Ministry of Education. It is important for school boards to have flexible available funding to ensure that they can meet the local needs of their communities.

Under the *Education Act*, boards also have responsibility for their multi-year strategic plans. Any outcome-based funding would need to honour these commitments made and approved by the Board.

It is critical for the TDSB to have accurate information on possible changes to funding as early as possible. Currently, the TDSB has to make school staffing decisions in early March to meet collective agreement timelines and to ensure that our schools are ready for the upcoming school year. As the Ministry noted in their consultation document, efficient, outcomes-based and value for money decisions are required to ensure resources are spent effectively on student achievement and well-being. School boards need the Ministry of Education to provide their annual funding allocations in sufficient time so that school boards can do this within collective agreement timelines. The result of notification of these allocations would be more efficient decisions by school boards regarding the number of staff required in their schools.

Provided below is the TDSB's response to the themes contained in the Education Funding Engagement Guide, 2019-2020:

- a) Efficient Price Setting;

- b) Outcomes-Based Funding;
- c) Accountability and Value-for-Money; and
- d) Other Education Funding Efficiencies.

a) Efficient Price Setting:

Considerations:

1. Are there areas of the Grants for Student Needs (GSNs) which currently use efficient price setting which could be re-evaluated for further efficiencies?

Efficient pricing is an economic model that suggests that perfect information is known to set a price. The concern with the example provided, 'class size', is that it only addresses averages and space usage, not student achievement outcomes. The TDSB would ask: What information was used to set current benchmarks and was student achievement and well-being data used in the calculation? At the TDSB our Multi-Year Strategic Plan is focussed on student achievement and well-being outcomes.

2. Are there allocations of the GSN which currently do not use efficient price setting, but should be considered for reform?

Efficient price setting involves ensuring that all information is known about the factors impacting price (i.e. benchmarks). It is difficult from a provincial perspective to set pricing that addresses the diverse needs of individual school boards. It could be argued that given class size, pricing has different impacts on student achievement and well-being in northern Ontario vs downtown Toronto.

b) Outcomes-Based Funding

Considerations:

1. Are there areas of the GSN which could be reformed to an outcomes-based model (e.g. Learning Opportunities Grant)? How would the outcome be measured?

Funding based on outcomes would be a significant departure from the initial purpose of the GSN which was to create equity of funding for students across the province. A funding model based on outcomes would return boards to a similar place prior to the GSN, but this time it would not be based on the ability to tax but on your social economic challenges impacting student achievement and well-being. The TDSB has developed a Multi-Year Strategic Plan to improve student achievement and well-being based on data driven outcomes. Further to that, the TDSB utilizes census data from students, parents and staff to guide where to invest to support the board's five pillars.

2. How can the funding model do a better job of indicating whether the investments made have maximized returns in achievement?

The funding model is a method of providing funding to school boards. Boards use local flexibility with the funds to address local needs that support student achievement and well-being. The TDSB would suggest that the funding model is not the tool to indicate the impact on achievement. Other data points or reports can provide this information.

c) Accountability and Value-For-Money

Considerations:

1. Are there parts of the funding formula that are not core to the delivery of education in Ontario? If so, what are they?

It is important to remember that the Ministry has stated that the GSN is to support schools boards to meet their local needs delivering the curriculum to students and school boards are responsible for their student achievement and well-being. As such, school boards use their GSN allocation strategically to make choices that best support improving student achievement. The TDSB believes that through development of local programs and supports aligned to its strategic plan it is meeting its legislative requirement. The Ministry has yet to inform school boards on how it identifies its core commitments to student achievement and well-

being. Once these are known, school boards can better address this question.

2. Should the government explore ways for alternative access to non-core programming?

TDSB students come to school with a wide variety of needs that we must address in order to create learning environments in which students can succeed and have a strong sense of well-being.

Therefore, the TDSB is always looking for partners to assist in creating effective and efficient learning environments for our students. We would suggest that the government better coordinate support for families and students to ensure that the student comes to school ready to learn and able to succeed in their education. We need to look at the whole student to understand those factors that impact their learning. If we want to use public funds effectively and efficiently we need to address barriers to learning from both inside and outside the school.

3. Should the Ministry undertake a review of targeted areas of the funding formula to increase accountability and value-for-money? If so, what are they?

The TDSB agrees with the concept of accountability for the use of funding to support student outcomes. The TDSB has created a Multi-Year Strategic Plan that is based on evidence and has measurable outcomes that hold the Board accountable. Value for money is important. This is the concept that is used by the TDSB to ensure that the limited resources provided to school boards are allocated effectively and efficiently to support student achievement and well-being.

d) Other Education Funding Efficiencies

Considerations:

1. Are there areas of overlap or duplication within the GSN? If so, what are they?

We do not believe there is any overlap within the GSN. The TDSB fully utilizes all funding to support student achievement and well-being. TDSB has created an evidence-based and outcome-driven strategic plan to ensure its resources align to its five pillars:

- 1. Transform Student Learning;*
- 2. Create a Culture for Student and Staff Well-Being;*
- 3. Provide Equity of Access to Learning Opportunities for all Students;*
- 4. Allocate Human and Financial Resources Strategically to Support Student Needs; and*
- 5. Build Strong Relationships and Partnerships Within School Communities to Support Student Learning and Well-Being.*

2. Are there areas of overlap or duplication with other funding streams (e.g. Education Programs – Other, other ministries, other levels of government)? If so, what are they?

The significant overlap is not with funding, but with the administrative reporting needed to support Education Program – Other (EPO) and other levels of government reports. The funding is important to support student achievement and well-being, but the administrative burden on reporting needs to be reduced.

Also, we believe some areas of EPO funding should be permanently moved into the GSN to increase efficiency for the money spent while also increasing transparency. The Community Use of Schools grant is a great example of a program that has been working for years, is a highly efficient use of money, and would benefit from more stable funding. Moving these long-term, highly effective and efficient programs into the GSN would stabilize this funding, reduce the administrative burden for school board reporting and on Transfer Payment oversight within the Ministry.

Council of Senior Business Officials (COSBO)

Consultation: 2019-2020 Grants for Student Needs December 2018

About Council of Senior Business Officials (COSBO)

COSBO was established in 2001 and includes membership of Senior Business Officials from all Boards in Ontario. The executive membership meets monthly and consists of the following representation:

- 1 member from a French Public Board
- 2 members from French Catholic Boards
- 6 members from English Catholic Boards
- 6 members from English Public Boards

The goal of COSBO is to:

- Provide advice, guidance and feedback to the Ministry of Education on various policy issues
- Problem solve through a collaborative approach for Boards and Ministry of Education
- Ensure on-going, open communication with Boards and the Ministry of Education
- Support and ensure COSBO initiatives are aligned with CODE
- Provide leadership, support and professional development to the membership

2019/2020 Grants for Student Needs Consultation

The Council of Senior Business Officials (COSBO) supports the government's commitment to improving accountability and making effective and efficient use of tax payer dollars. We welcome the opportunity to work closely with the Ministry of Education to be an advocate in terms of providing advice and expertise regarding changes to funding across the sector.

Efficient Price Setting

The modern role of the ministry is as a system funder and steward. One of the best ways to ensure strong delivery of service and return on investment is to set efficient prices. Parts of the Grants for Student Needs (GSN) are already consistent with the concept of efficient price, for example, class size funding based on averages and funding based on the efficient use of space.

Considerations:

- 1. Are there areas of the GSN which currently use efficient price setting which could be re-evaluated for further efficiencies?**
- 2. How can the funding model do a better job of indicating whether the investments made have maximized returns in achievement?**

Response:

Staffing

Approximately eighty (80) to eight-five (85) percent of expenditures within a school board are directly related to salary and benefit costs. Therefore, the magnitude of the efficiency gains the government is seeking will likely not be achievable without impacting some levels of staffing. This in itself may present challenges as some staffing levels may be constrained by collective agreements and/or other regulations.

Providing school boards with flexibility to adopt an incremental, phased-in approach over an extended period will assist boards in producing changes that are more sustainable over the long-term.

Identifying efficiency gains through a more streamlined process requires time for implementation, planning and execution as well as necessary funding to make the

investment in software solutions. A phased-in approach that allows board staff the ability to gradually phase-in changes would support sustainable change.

Funding Formula

Any revisions to the funding formula/price setting should contemplate the desired service levels within the sector. Revisions to the funding formula in 1998 may have reflected what Boards were able to spend in those envelopes at the time instead of what they should have been spending. Revisions to the funding formula represent the opportunity to allow all Boards to achieve the Ministry's and their own strategic plans and goals.

By accessing the vast experience that exists within the school boards across the province, the Ministry will be able to develop a more effective and efficient funding formula. Boards continue to struggle with funding envelopes developed nearly 20 years ago. These funding envelopes were developed at a time when boards allowed funding to dictate service levels as opposed to local needs driving funding. Therefore, it will be important to allow the appropriate amount of time for ministry staff to work collaboratively with expertise from boards to ensure any changes to funding formula are collaboratively and thoughtfully designed so that the impact of the transition on service delivery to students is seamless. Extra time invested up front will avoid future challenges of attempting to fit service levels into historically frozen funding targets. Funding formulas need to be driven by equitable student focused service level targets first and then supported by a funding formula designed with the intent to improve service levels and ultimately returns in achievement.

Outcomes-Based Funding

Outcomes-based funding is intended to aid students by encouraging schools to focus more on providing supports and clearing the obstacles that prevent some students from achieving their full potential and graduating.

Although the GSN was not designed as an outcomes-based model, portions of it could be targeted to reducing gaps in student outcomes, which could result in better and more equitable results for students and their families.

Considerations:

- 1. Are there areas of the GSN which could be reformed to an outcomes-based model (e.g. Learning Opportunities Grant)? How would the outcome be measured?**
- 2. How can the funding model do a better job of indicating whether the investments made have maximized returns in achievement?**

Response:

The use of funds must remain flexible in order to provide the sector with flexibility in addressing cost structures. As more and more areas of the funding allocations are enveloped or restricted, the ability to address local needs and local cost structures require some funding to be 'unrestricted'. For example, overspending in transportation or special education needs to be supported from elsewhere in the funding allocations.

Enveloping within the Learning Opportunities Allocation (Student Success) hinders good decision making as various components need to be treated and reported separately. Leveraging funding across the allocation is hindered. Using caps and envelopes for funding allocations does not make for effective and efficient allocation of resources.

Accountability and Value-For-Money

The ministry is focused on ensuring that taxpayers get the best possible service for their money. It is also focused on ensuring that funding is being used for its intended purpose. With limited resources, it means keeping the focus on key priorities and making strategic choices about how best to use resources to improve student achievement.

Considerations

- 1. Are there parts of the funding formula that are not core to the delivery of education in Ontario? If so, what are they?**
- 2. Should the government explore ways for alternative access to non-core programming?**
- 3. Should the ministry undertake a review of targeted areas of the funding formula to increase accountability and value-for-money? If so, what are they?**

Response

Flexibility within the funding formula will allow boards to select from a list of priorities to address local needs with outcomes-based reporting that's congruent with the government's need for accountability and value-for-money.

With respect to the Education Program Other Grants (EPO), the processing and reporting requirements associated with these grants are significant and require a substantial amount of time and resources to administer in relation to the value of funds allocated. Detailed reporting only provides transparency as to what funds were used for and do not necessarily provide an indicator as to whether the funds were effective and achieved the desired outcomes. The inclusion of the EPO Grants in the GSN will help to reduce the reporting requirements and delays in implementing learning strategies because the funding is not received in a timely manner. By refocusing Boards' efforts to

reporting on an outcomes-based approach, the Ministry will improve the value-for-money received for these finite resources.

When EPO funds are allocated specifically for release-time, this serves to exacerbate the problems Boards' experience with absenteeism in the classroom. On many occasions Boards experience a lack of supply teachers to support teachers as they engage in professional development which leads to the cancellation of the release-time. In these instances, the overall objectives of the EPO Grants may not be met and funds are left unspent.

If the priorities of the EPO Grants are clearly defined with desired outcomes that are measurable then this would allow boards to leverage EPO funding in a manner that complements their current strategic plans and operations rather than being an add-on that results in inefficient usage of funds.

Other Education Funding Efficiencies

The ministry continues to evaluate opportunities to streamline, review and strategically bundle education funding – both in the GSN and through other transfer payments – that support the delivery of education in Ontario.

Considerations:

1. **Are there areas of overlap or duplication within the GSN? If so, what are they?**
2. **Are there areas of overlap or duplication with other funding streams (e.g. Education Programs – Other, other ministries, other levels of government)? If so, what are they?**

Response:

Sick Leave Plan Design

The original intent of the sick leave plan implemented as part of the 2012-2014 Memorandum of Understanding was to reduce sick leave provisions from 2 days per month, to 11 days per year. As school boards did not have a short-term disability plan to bridge the waiting period for qualification for long term disability plan, an additional 120 days have been added, with the intent to qualify on a case by case basis.

Through later central negotiations, the adjudication process was eliminated, and the sick leave plan, as currently designed, provides for 131 sick days per year, 120 paid at 90%. School boards are limited in what measures can be implemented in their attendance support programs due to centrally negotiated terms. Sick leave data collected by School Board's Co-Operative Inc. (SBCI) since the start of the new plan shows an increasing trend in absenteeism (over 50 school boards participate in the sick leave data collection). The 2017 report by the provincial auditor general also reiterated this trend and offered that sick leave has increased by about 30 percent from the 2011/2012 school year to the 2015-2016 school year.

The increase in absenteeism across the province has not only increased the cost of replacing student facing staff, but also impacts student achievement and creates pressures in placing supply/casual staff across the school board.

The current plan design is cost prohibitive and seen as a perquisite rather than a safety net. It is also not reflective of other public sectors' sick leave plan, and limits management's ability to implement measures that support the wellness of board staff, student achievement and well-being by supporting educators' ability to be in the classroom.

To contain costs and impact of student achievement, the plan design requires changes, and/or there should be an investment in the attendance support programs across to province, with focus on reducing absenteeism.

2019-20 Education Funding Guide

In June 2018, Ontario elected a government committed to restoring accountability and trust in Ontario's public institutions and finances.

Since coming to office, we have taken a number of positive steps to improve our province's education system. Currently, we are engaging in broad public consultations that will ensure that everyone interested has an opportunity to provide feedback and help shape the future of education in Ontario.

I believe educating our children is the most important job in the world. Here at the Ministry of Education we are committed to working together to achieve student success, while spending taxpayer dollars efficiently and with greater accountability. We are also looking to our education partners to provide input on how we can achieve these efficiencies throughout the sector.

Together, we will prepare Ontario students for success, improve their academic achievement and equip them with the tools they need to face the realities of today and the possibilities of the future.

Sincerely,

The Honourable Lisa Thompson,
Minister of Education

Each year, using the expertise and insight of our partners, the ministry works to address funding challenges and opportunities for Ontario's students and families. Using this engagement guide, we are again requesting feedback that will help us to deliver vital education programs and services efficiently.

Ontario's education system is strong in large part because of the leadership and advocacy of our school boards and education stakeholders. As Deputy Minister, I look forward to further strengthening our partnership and working collaboratively on behalf of students.

Thank you in advance for sharing your valuable insights and ideas as part of this year's education funding engagement.

Sincerely,

Nancy Naylor
Deputy Minister of Education

Introduction

The government recently released a line-by-line review of government spending, [Managing Transformation - A Modernization Action Plan for Ontario](#), undertaken by Ernst & Young LLP. The review reveals rapid expenditure growth across key sectors and public programs under the previous government. The review was based on analysis of government financial and program data, and builds on the work of Ontario's Auditor General and the Financial Accountability Officer.

The government is committed to improving accountability and making efficient and effective use of taxpayer dollars. The EY review outlined an objective of efficiency gains in the order of four cents on the dollar to be found in the governments' expenditures. As such, the government will be looking to our partners in the education sector to find efficiencies and improve accountability.

As Ontario's deficit has ballooned to \$15-billion, the line-by-line review recommends a number of large-scale opportunities to transform programs and services to ensure sustainability and value for money. This discussion guide will ask questions about how to start thinking about education funding reform in Ontario, including more efficient price setting and outcomes-based funding.

For more information about the current education funding model, please see the [2018-19 Education Funding](#) page of the Ministry of Education's website.

About this Engagement

Education partners are being provided with an opportunity to submit feedback about education funding, through written electronic submissions, on the following four topics:

- Efficient Price Setting;
- Outcomes-Based Funding;
- Accountability and Value-for-Money; and
- Other Education Funding Efficiencies.

You may also submit feedback on education funding topics not outlined in this guide. In order to ensure your feedback is considered, please forward your electronic submission by **Friday, December 14, 2018** to: EDULABFINANCE@ontario.ca arranged by topic.

Should you have any questions about this engagement guide, please send them to: EDULABFINANCE@ontario.ca.

Other Education Engagements

The government has recently embarked on the largest education consultation in Ontario's history and is inviting everyone – parents, students, educators and interested individuals or organizations – to provide feedback on the education system in Ontario. The consultation includes open submissions, an online survey and telephone town halls.

For more information, please visit the consultation [website](#).

Efficient Price Setting

The modern role of the ministry is as a system funder and steward. One of the best ways to ensure strong delivery of service and return on investment is to set efficient prices. Parts of the Grants for Student Needs (GSN) are already consistent with the concept of efficient price, for example, class size funding based on averages and funding based on the efficient use of space.

Considerations

1. **Are there areas of the GSN which currently use efficient price setting which could be re-evaluated for further efficiencies?**
 - **Using average class sizes and eliminating hard caps would help in more efficient program delivery.**
 - **Level of financial reporting requirements should be reviewed to ensure that the information being provided is of value and warrants resources to prepare.**
 - **Enhance special considerations within the GSN for equity concerns, population density, socio-economic conditions, disabilities, etc.**

2. **Are there allocations of the GSN which currently do not use efficient price setting, but should be considered for reform?**
 - **Analysis of sick leave and attendance programs is recommended. Sick leave is not specifically funded for a number of groups but the costs accrue for all.**
 - **Consider enabling access to a provincial Human Rights Office for smaller school boards instead of having HRO at multiple school boards.**
 - **Pupil Accommodation Review process, which is currently on hold, should be reinstated on an individual business case basis so each can be evaluated by the Ministry on its merit, impact on student programs and costs.**
 - **The special education costing is growing significantly without appropriate level of increased funding.**
 - **Any reduction in funding should have a corresponding reduction in externally controlled expenses.**

Outcomes-Based Funding

Outcomes-based funding is intended to aid students by encouraging schools to focus more on providing supports and clearing the obstacles that prevent some students from achieving their full potential and graduating.

Although the GSN was not designed as an outcomes-based model, portions of it could be targeted to reducing gaps in student outcomes, which could result in better and more equitable results for students and their families.

Considerations

1. Are there areas of the GSN which could be reformed to an outcomes-based model (e.g. Learning Opportunities Grant)? How would the outcome be measured?
 - Outcome based model would be difficult to implement as it may take a number of years of revised program/process to be able to assess how well the program worked.
 - Outcome-Based Funding may have unintended impacts and create cause for alarm. Clear criteria should be established that is reflective of current research and evidence.
 - Outcomes based models can turn into “reading benchmarks”. Issues become exasperated by “teaching to the test” to reach specific outcomes.
 - Targeted funding should be designed to close gaps of students who are underperforming and underserved with an emphasis on evidence-based intervention
2. How can the funding model do a better job of indicating whether the investments made have maximized returns in achievement?
 - As mentioned above, it may take years to see data indicating if results changed.
 - Consider performance-based bonuses for leaders.
 - Consider short, medium and long term goals.
 - Define achievement with caution and ensure the focus on well-being is maintained.
 - Establish an evaluation framework that includes benchmarks that are monitored and analyzed.
 - School climate surveys/student and parent census should be used to target intervention.
 - Quality assurance and accountability for data collection in relation to the outcomes-based funding is necessary

Accountability and Value-For-Money

The ministry is focused on ensuring that taxpayers get the best possible service for their money. It is also focused on ensuring that funding is being used for its intended purpose. With limited resources, it means keeping the focus on key priorities and making strategic choices about how best to use resources to improve student achievement.

Considerations

1. Are there parts of the funding formula that are not core to the delivery of education in Ontario? If so, what are they?
Funding is being used for its intended purpose.

2. Should the government explore ways for alternative access to non-core programming?

Defining “non-core” is essential.

3. Should the ministry undertake a review of targeted areas of the funding formula to increase accountability and value-for-money? If so, what are they?
 - Targeted funding does not provide more accountability or value for money as it may be too restrictive. Different areas have different needs and flexibility should be allowed.
 - Boards are already accountable in all areas.

Other Education Funding Efficiencies

The ministry continues to evaluate opportunities to streamline, review and strategically bundle education funding – both in the GSN and through other transfer payments – that support the delivery of education in Ontario.

Considerations

1. **Are there areas of overlap or duplication within the GSN? If so, what are they?**
 - **Consider review of standardized testing and the consideration of random sampling and ensure results are used for student and school improvement.**
 - **Consider public and separate education systems and how to share space and services.**

2. **Are there areas of overlap or duplication with other funding streams (e.g. Education Programs – Other, other ministries, other levels of government)? If so, what are they?**
 - **Continue to streamline and bundle EPOs to reduce the administrative and reporting burden on school boards. Align funding timelines to the school year calendar to enable appropriate timelines for planned and thoughtful spending.**
 - **Where value of a particular EPO has been demonstrated, the grant should be incorporated into GSN.**
 - **More collaborative programming with MCCSS funded programs.**

Additional comments from Special Education Advisory Committee

- Any review of cuts should focus on areas that are far removed from student success.
- Trimming the transportation line, not by cutting service but by moving as quickly as possible to green/electric buses.
- There may be other areas to look at to save money that do not affect special education students.
- Children are our future and cutting their education is a shortsighted move. Instead we should be investing more heavily to ensure that our children are well prepared to be the way forward into our collective future
- There must be a role for parents in the evaluation process for special education programming and that curriculum must be flexible enough to allow for individual education programming for the diverse needs of students with ASD throughout their education and transition process.
- This process must be assessment-based, using tools and/or strategies specific to the learning needs of students with ASD with an emphasis on evidence-based practices. These plans must include appropriate supports and classroom/curriculum adaptations to ensure maintenance of previously acquired skills and continuity of learning.
- When we invest in supports and strategies we know to work, we waste less money and time and our students receive the best possible education outcome. This includes an emphasis on teacher training, community collaboration with autism professionals, evidence-based programming like ABA and PEERS and a role for families and caregivers in this process.

- A range of educational placements are important – based on individual need (from full inclusion to specialized classes). When we invest in positive educational outcomes, autistic students are better prepared to make meaningful contributions to society when they graduate.

Also:

1. The biggest barriers to support that families experience continue to be long waitlists and financial restriction. What role will our education system play in helping to alleviate these barriers for families?
2. Our Canadian prevalence rate is now sitting at 1 in 66 Canadian children diagnosed with ASD; how will our education system address these increasing rates? How are they budgeting their resources to meet this growing student population?
3. One of the most significant issues about ABA programming in Ontario is the challenge of access to excellence in ABA-based supports in Ontario's publicly funded schools. Despite much progress in awareness and understanding in Boards of Education, and even with PPM-140, we know that school issues remain one of the top concerns expressed by parents of students on the autism spectrum. The gap that remains between coordinating ABA services between schools and the community must be resolved if parents are to have confidence that their children will be able to achieve their full potential.
4. A supportive education system includes well-planned transitions to services that provide optimal participation, inclusion and success of the child or adult on the autism spectrum.
5. A robust education system includes ASD-trained and regulated health professionals, educators, behaviour, communication therapists, mental health practitioners and ongoing ASD training to understand, intervene and support people with ASD at all ages and stages of development and life.
6. For education programs to be evaluated properly, parents/caregivers MUST be active, informed partners in the planning, delivery and evaluation of program supports for their children and families.

Conclusion

As all effective organizations do, we must continue to look for best practices in managing resources and continue to work collaboratively to develop future strategies for achieving greater efficiencies. Going forward, program funding in the education sector will need to be managed carefully with the goal of preparing Ontario students for success, improving their academic achievement and equipping them with the tools needed to enter the working world.

Thank you for taking the time to read this guide, and we look forward to receiving your submission.

Submission to
The Minister of Education

**Partners in Excellence:
Balancing Equity & Efficiency**

14 December 2018

TORONTO CATHOLIC DISTRICT SCHOOL BOARD

Efficient Price Setting

The modern role of the ministry is as a system funder and steward. One of the best ways to ensure strong delivery of service and return on investment is to set efficient prices. Parts of the Grants for Student Needs (GSN) are already consistent with the concept of efficient price, for example, class size funding based on averages and funding based on the efficient use of space.

Considerations

1. **Are there areas of the GSN, which currently use efficient price setting which could be re-evaluated for further efficiencies?**

Efficient price setting begins with ensuring the funding benchmark rates reflect the actual costs intended to be funded by that funding benchmark, and thereby, eliminate the inefficient reallocation from other funding sources.

i. **Benefits funding**

The employers cost for statutory benefits, i.e. CPP & EI, and group benefits provided by the Benefit Trusts are not fully funded. The funding benchmark rates do not cover the actual cost of employees' benefits.

- a. CPP Rates are scheduled to increase substantially in the next few years. Is the Ministry going to fund these rate increases?
- b. Explore the concept of channeling the full cost of Group Benefits directly from the Province to the Benefit Trusts rather than through Local Boards in order to generate administrative efficiencies.

ii. **Provincial Central Bargaining while efficient in setting salary and benefit rates rendered any Local Bargaining outcomes potentially unfunded**

Historically local bargaining for all matters, i.e. salaries, benefits and working conditions, etc., covered the total cost impact from the identified funding source during bargaining. Given that Provincial Bargaining retains control over the funding for salaries and benefits rates, Local Bargaining potentially adds new terms and conditions into Local Collective Agreements with their own administrative costs without any funding element to offset these costs. Some examples of local bargaining language include the following:

- a. Additional Joint Board/Union Committees
- b. Increased the time required for Unions to review Teacher staff allocations from 2 to 3 weeks

2. Are there allocations of the GSN, which currently do not use efficient price setting, but should be considered for reform?

- i. **International Languages (IL) Program** funding did not see an increase in funding for 12 years prior to 2006. In 2006, IL funding increased for negotiated Salaries and Benefits rate changes (3%). Since 2006, there have been funding updates to match what other employee groups received; however, the 12 year gap when no increases were given was never addressed and renders the staff in these programs far behind other school board employees for cost of living adjustments.
- ii. “Schools that succeed in bringing issues related to cultural and linguistic diversity from the periphery to the center of their mission are much more likely to prepare pupils to thrive in the interdependent global society within which they will live. These schools will communicate to pupils and communities that their access to more than one culture and language is a resource that can enrich the entire school.” J. Cummins
 - a. The International Languages Elementary (ILE) Program operated by the Toronto Catholic District School Board continues with its history of providing children with valuable opportunities to learn a third language and culture. When the Ministry of Education established Ontario's Heritage Languages Program in July 1977, the TCDSB already had considerable experience in the field. As early as 1973, the Board, in cooperation with several community organizations, was piloting "Heritage Languages" classes for some 5,700 children in 14 schools. In 2017-18 TCDSB has 44 schools that run the ILE program during the school day
 - b. The Toronto Catholic District School Board offers elementary students an opportunity to learn an International Language in an Integrated Day or After Hours delivery model. The International Languages Elementary (ILE) Program enriches a child’s education through third language instruction, cultural awareness and a celebration of

traditions. This report provides an overview of the ILE Program delivery models for the 2017-2018 academic year, including a statistical and financial overview.

- c. In the ILE Integrated Day Program delivery model, students in 44 TCDSB schools in JK to Grade 8, received 30 minutes of instruction per day, in the target language, during the regular school day. This model extended the school day by 30 minutes. TCDSB offered the following International Languages: Italian, Portuguese, Spanish, Ukrainian, Pilipino and Mandarin during the Integrated Day. IL instructors were an integral part of the school community. In addition to teaching and reporting on student achievement, they also participated in extracurricular activities, as for example, chess club, sports, spelling bee contests, and literary contests. In addition, instructors in the ILE Integrated Program, in collaboration with the Community Relations Department, prepared students in the target language for all TCDSB Heritage Month Celebrations.
- d. In the After Hours deliver model, students are offered the opportunity to maintain their heritage language or learn an additional International Language outside of the regular school day. In this model, the majority of classes were offered on Saturdays mornings, with the exception of one centre that is operating on Sundays and one operating on Tuesdays. Classes commenced on the third weekend of September and ended on the second weekend of June. There were 30 sessions in total for the academic year. Each session was 2 ½ hour in length. In addition to language and cultural learning, these programs had strong community ties and parental involvement. Throughout the academic year, these programs had many community building activities and cultural celebrations, closely tied to the local parish or community.
- e. Over the years, TCDSB International Languages Elementary (ILE) Department developed curriculum for the following ILE target languages: Italian, Spanish, Portuguese, Filipino and Mandarin. These ILE Curriculum documents follow the Ontario Ministry Language Overall and Specific Expectations for JK to Grade 8, with accompanying teaching strategies and resources.

iii. **Transportation Grants for Student Needs Funding**

The TCDSB has a \$9M Transportation funding deficit growing to \$11M deficit due to increasing costs of fuel and inflation in the 2018-19 Revised Budget. The Grants for Student Needs (GSNs) do not reflect the actual cost of transportation services, as determined by recently completed Request for Proposals in the Toronto market, and reduces funding to School Boards that do not mirror the one size fits all provincial model.

- a. Transportation funding requires boards to RFP every few years for bussing in order to find efficient market prices. The Toronto Consortium completed a RFP 2 years ago and came back with Quotes that increased the TCDSB transportation expenditures by \$5M. However, the GSN funding did not respond to this substantial increase in costs with offsetting funding.
- b. Section 23 students are provided transportation services from home to Care & Treatment Centers or School; however, these students are not part of TCDSB grantable students and do not generate transportation grants.

iv. **Board Administration & Governance Grants do not provide adequate funding for Enterprise Systems.**

- a. GSNs do not provided direct funding for Enterprise Financial and Student Information Systems such as SAP and Trillium for upgrades or increasing Ministry reporting requirements, i.e. tracking information for violent incidents, teacher performance appraisals, etc.
- b. Other reporting requirements through ONSIS has also increased significantly. ONSIS added Continuing Education enrolment (approx. 40,000 students) and elemental data as required data to collect and submit to the Ministry of Education. This creates additional administrative workload without permanent Board Administration GSN funding for support staff.

v. Maternity Leaves and Short-Term Disability

- a. Central Agreements require School Boards to pay out 6 weeks of Maternity Leave -Top up since 2012-13 (with no additional funding). In addition, the top-up increased to 8 weeks (GSNs funds only 2 of 8 weeks) increasing the cost for the TCDSB by \$3.8M.
- b. Costs for short-term disability leaves increased significantly due to the 120 days sick day provision paid at 90% resulting in an additional TCDSB cost pressure of \$23.5M for 2017-18.
- c. GSN funding for short term & maternity leaves for TCDSB is \$1.27M in 2017-18. Consequently, the centrally negotiated terms for short-term and maternity leaves created \$27.3M (\$23.5+\$3.8M) in additional costs with only \$1.27M in GSN funding to offset the incremental cost pressures.

vi. Earned Leave Plans

- a. Centrally negotiated agreements modified sick day provisions by including an earned leave component designed to incent teachers take less sick days.
- b. For example, if a teacher uses less sick days than the Board's average sick day count, the board accrues the costs of giving that teacher 1 day off at the supply rate in the following school year. Generally, 50% of TCDSB teachers are below the 2012-13 average and they get 1 day off at a supply rate. The increase in the liability as at the 2017-18 year-end is \$689K for TCDSB resulting in a total accumulation of \$2.387M over a 3-4 year period. Few teachers have utilized their respective earned days because the short disability leave day is remunerated at 90%, which is greater than the supply day.
- c. In addition, the GSNs decrease when teachers use less days than the 2012-13 average. TCDSB GSNs could decrease by \$650K.

Outcomes-Based Funding

Outcomes-based funding is intended to aid students by encouraging schools to focus more on providing supports and clearing the obstacles that prevent some students from achieving their full potential and graduating.

Although the GSN was not designed as an outcomes-based model, portions of it could be targeted to reducing gaps in student outcomes, which could result in better and more equitable results for students and their families.

Considerations

3. Are there areas of the GSN which could be reformed to an outcomes-based model (e.g. Learning Opportunities Grant)? How would the outcome be measured?

i. Enveloped/Restricted Learning Opportunities Grants

- a. A restricted funding envelope for Learning and Opportunity Grants (LOG) not available for flexible use by the Board for local priorities will not serve the unique and varying academic and programming needs for students across the Province and local regions.
- b. The flexible nature of the GSNs also facilitates the pursuit of equitable outcomes of student achievement and well-being, which differs significantly by urban/rural location, and provincial region.
- c. As context for the 2017-18 fiscal year, the LOG GSNs totaled approximately \$49M, and 40% or \$20M is used directly on LOG programs and services.
- d. The remaining 60% or \$29M is used on a variety of other programs including:
 - Special Education Programs & Services
 - Alternative Education Programs
 - Student Supervisors
 - Transportation Services
 - Elementary Teachers
 - Secondary Teachers
- e. At a high level, should we allocate 100% of LOG funding to LOG programs, then the following approximate reductions would need to occur to remain fiscally neutral:

- **36.5** fewer Special Educations EAs
- **42** fewer Secondary School Student Supervisors
- **60** fewer Elementary School Teachers
- **34.5** fewer Secondary Teachers
- **Reduce \$5.5M** from Alternative Education and Special Education programs
- **15%** reduction in Transportation services

Accountability and Value-For-Money

The ministry is focused on ensuring that taxpayers get the best possible service for their money. It is also focused on ensuring that funding is being used for its intended purpose. With limited resources, it means keeping the focus on key priorities and making strategic choices about how best to use resources to improve student achievement.

Considerations

1. Are there parts of the funding formula that are not core to the delivery of education in Ontario? If so, what are they?

i. Health and Safety Teachers/Inspectors

Health and Safety Teachers/Inspectors are not core to the delivery of education in Ontario nor funded by the GSNs. However, the TCDSB has lost recent arbitrations that added 13 Full-time Elementary and Secondary teachers at a cost of over \$1.4M without a funding source. Health and Safety Committees and their respective Inspectors have turned into full-time positions not part of the core delivery of education in Ontario.

ii. Secondary Student Supervisors

Student and Staff safety in schools is an ongoing safety concern in both elementary and secondary schools. Currently, the GSNs fund Lunchtime Supervisors in the elementary panel, but there is no GSN funding for Secondary Student Supervisors. Currently, the TCDSB has 70 Secondary Student Supervisors staff.

iii. Preschool Intensive Support Program (ISP)

Children, who are Deaf and Hard-of-Hearing and aged three to six years, may attend a preschool ISP class at TCDSB. A language-rich learning environment provided to students requiring intensive support to develop their communication skills prior to entering school so that they do not fall behind and ensure student success in future years.

2. Should the government explore ways for alternative access to non-core programming?

i. Health and Safety Inspectors

a. Should be funded by either the Ministry of Labour
OR

b. Since Ontario has a rigorous inspection regimen when it comes to enforcing health and safety in the workplace. Perhaps the Ministry of Labour include School Boards in their inspections via professional and certified health and safety inspectors to ensure every workplace is compliant with the Occupational Health and Safety Act (OHSA). Their job is to confirm that businesses are taking workplace health and safety seriously by following OHSA laws and regulations.

ii. Deaf and Hard of Hearing pre-school age children

Pre-school children who are deaf and/or hard of hearing who receive pre-school hearing assessments and participate in ISP programs achieve better results prior to entering Junior Kindergarten. The Ministry of Health should work with school boards, fund pre-school hearing assessments and early entry into schools to improve student success.

3. Should the ministry undertake a review of targeted areas of the funding formula to increase accountability and value-for-money? If so, what are they?

i. Lunch-Time Hour provided to Staff at the Elementary school level

a. Is the Lunch hour paid or unpaid time?

b. Is the Lunch hour partially paid time?

c. If it is partially paid, how are the paid staff used?

d. Are there any labour standards that impedes a board's management from using this paid time to support student's safety or instructional time (i.e. resource support for Special Education, ESL, Math, or used as Preparation-time)

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