

# **IMPROVING RURAL EDUCATION**

## **Executive Summary**

**AN EDUCATION PROJECT FUNDED BY  
THE UNITED COUNTIES OF STORMONT, DUNDAS & GLENGARRY  
ONTARIO, CANADA**



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November 10, 2021

The United Counties of Stormont, Dundas and Glengarry (“SDG”) in Ontario, Canada has a population of 66, 000 distributed over six rural municipalities. The elected body of County Council, issued a call for proposals for an education improvement project titled *Improving Rural Education in Stormont, Dundas and Glengarry* counties on February 5, 2021.

The education project was one of five key priorities identified in the Council’s strategic plan 2019-2022 under the heading *Rural Schools- Educating Children in Their Communities*, in alignment with the guiding principles of: “*Our residents are our first priority, no municipality gets left behind, partnerships as essential for our success and our environmental legacy is important*”. These principles are encompassed under a Mission “*to create better communities*” and a Vision “*to be a progressive regional government*”. “*The County is committed to working with the province, local school boards, parents and other stakeholders to develop strategies that maintain the vibrancy of our rural schools*”.

The migration of people from rural communities to urban centres has been a global trend since the middle of the 20th century. Rural agricultural regions have faced limited growth and development, resulting in steadily declining school enrollment for over 40 years due, in part, to families having fewer children, overall declining birth rates in the Canadian population and resident mobility in search of employment.

Declining school enrollment is evidenced by school closures, school board amalgamations and student transportation to schools further away from a student’s place of residence. More recently, the restructuring of educational service provision, programs and student support services and the emergence of online and virtual platforms as a means to access education during the global COVID19 pandemic have given rise to new meanings for school, education and community.

The full report investigates the challenges and opportunities for educational planning in the present and into the future, by all stakeholders who benefit from quality public education services offered to students regardless of their place of residence within the province of Ontario, or by extension, any province in Canada. Strategies include local, provincial and federal initiatives and funding related options which can be engaged to prevent rural schools from closing.

The results and recommendations in the full report are intended for rural county councils to develop new educational initiatives within regional government, provincial government recognition of required support to students with a lens on equity in funding programs and services to increase best practices at school boards, and for local, provincial, national and international cooperation to enhance educational opportunities for all students.

In the province of Ontario, the restructuring of school boards in 1997 and the creation of four publicly funded school systems (English Public, English Catholic, French Public, French Catholic) has led to a continuous shift in education demographics over the last twenty years.

School board funding also underwent a major shift from municipal governments overseeing taxation rates related to education at a local level, to a process shifting it to provincial jurisdiction and centralized funding processes.

The dynamic of a four- school board system operating within a region of low population growth has created more competition for students. Aggressive public and social media marketing campaigns have been employed by some school boards to attract parents and students.

The increased interest for choice in schooling options by more involved parents and adolescent students choosing programs of interest with peers offered in different schools are also factors in the development of new solutions.

New data is required to measure the impact of these changes to inform new strategies, create new initiatives and opportunities for students; to demand compliance to existing policy, legislation and service standards for public education to maintain equity and to create new policies and changes to existing legislation where none exist, to enhance the delivery of educational programs and services.

The premise of community ownership of schools by citizens and taxpayers is also a new perspective which presumes school boards to be stewards of the schools in their operational structures but partners with the community and businesses to ensure the vitality and maintenance of each school in the context of the social fabric of each rural community.

Canada as a country relies heavily on immigration to sustain economic growth and the stability of health, education and social services. While immigration remains a federal responsibility, provincial and municipal governments can access funding from federal initiatives and programs to support local communities.

### **Barriers and obstacles**

In the context of this study a barrier is defined as a situation over which a parent or group of individuals has no direct control and is difficult to change (for example: policy, legislation, lack of data, type of building construction).

An obstacle is defined as a situation in which there is a lack of initiative, motivation, understanding and/or empathy on behalf of an entity which requires a large amount of advocacy time and energy to overcome by a group of people, but can be more easily changed than a barrier (bias, stereotypes, assumptions, beliefs, fossilized practices).

The full report aims to quantify and qualify main barriers in the maintenance of community schools and propose solutions to overcome those barriers with options and best practices that maximize local educational opportunities.

The Ontario Ministry of Education's 2006 *Equity Strategy* set the following additional expectations of the learning environment for students:

***DIVERSITY:** The presence of a wide range of human qualities and attributes within a group, organization, or society. The dimensions of diversity include, but are not limited to, ancestry, culture, ethnicity, gender, gender identity, language, physical and intellectual ability, race, religion, sex, sexual orientation, and socio-economic status.*

***EQUITY:** A condition or state of fair, inclusive, and respectful treatment of all people. Equity does not mean treating people the same without regard for individual differences.*

***INCLUSIVE EDUCATION:** Education that is based on the principles of acceptance and inclusion of all students. Students see themselves reflected in their curriculum, their physical surroundings, and the broader environment, in which diversity is honoured and all individuals are respected.*

## **PART 1 – TRENDS AND CHALLENGES**

Prior to providing solutions, an environmental scan of existing data must be undertaken to understand trends related to student enrollment in rural areas.

Updated information was collected on the 10-year enrollment trend, capacity, utilization rate and facility condition index for all schools in the United Counties of Stormont, Dundas and Glengarry (SDG) within the four-school board context.

Challenges were raised by Council members, students, parents, grandparents and residents in SDG and were stated in the call for proposal and through online survey results conducted from May to August 2021. This information was used to aid in the research and development of solutions, by quantifying and qualifying these issues.

1. The call for proposal listed these challenges:
  - a) *Slow population growth*
  - b) *Low population density throughout the region*
  - c) *Large school boards encompassing most of Eastern Ontario*
  - d) *Four school boards competing for students*
  - e) *Pupil Accommodation Review Guidelines (PARG) incompatible with rural Ontario realities*
  - f) *Shifting school boundaries, facilitating growth in some schools while ‘choking off’ others*
  - g) *Inequitable per pupil funding formulas that create disparities among/between boards/schools*
  - h) *Inequitable distribution of programming among schools*
  - i) *Inequitable per student transportation funding*
  - j) *Provincial and board transportation policies that enable the bussing of students long distances from their home communities*
  - k) *Funding formulas for new schools that favour larger facilities and disincentivize boards to share facilities*
  - l) *Lack of maintenance of older schools*
  - m) *Reluctance of coterminous boards to share facilities*
  - n) *Pandemic impacts, specifically remote learning*
  - o) *Reluctance of school boards to enter into community use agreements*

2. An Adult and Student Community Survey identified these additional challenges:

Challenges identified as Obstacles:

- *Same programs, courses not available at all high schools*
- *Large classes, split classes*
- *New start times, busing schedules, adolescents starting earlier than young children*
- *Incorrect facts or data used for school closures*
- *Quality of education /Arts programming and sports opportunities*
- *Mental health support to students*
- *Support to parents and consideration of families’ needs*
- *Special education, access to assessments & professionals supporting disabilities*
- *Acknowledgment & consideration of community, educator and parental input*
- *Lack of support staff, quality of French Immersion teaching*
- *Diversity of staff and students*

- *Outdated texts and curriculum (Eurocentric) contributing to sexism and racism*
- *Lack of communication from teachers*
- *Unfair boundaries*
- *Virtual learning*
- *Access to after school activities, field trips, sporting events due to busing cost*
- *Transportation to coop placements*
- *Academic and applied courses in the same class*
- *Perception of rural students headed to vocational work after graduation*

Challenges identified as Barriers:

- *Lack of internet or poor internet,*
- *Threat of school closures or school amalgamations*
- *Water quality*
- *Provincial funding formula*
- *Too many schoolboards*
- *Childcare availability*
- *Teachers' unions*
- *Accessible transit*
- *School ventilation and air quality*
- *Lack of Early Learning Centres*
- *Folding public and Catholic school boards into one school system*

Consultant identified challenges

- i. School program information hard to obtain through school board website searches for parents seeking to relocate
- ii. Lack of diversity in school board leadership
- iii. Lack of data and /or reliable data (one source only- school board data)
- iv. Municipal council members' perception of having a limited role in providing educational input
- v. Internet services (access and signal quality)
- vi. Obtaining information directly from school staff and school board personnel
- vii. Student trustees having a restricted role in feedback as key clients of educational services
- viii. School boards' perception of education monopoly over decision-making (transportation, costs, programs, school builds) business focused rather than service focused (bottom line vs client satisfaction)
- ix. Disconnect between regional employment sectors (energy, environment, manufacturing) and duplication of program offerings in Specialist High School Majors; no data on whether school boards are meeting the need for student skills training for sector employment
- x. Lack of school board policy to support decisions which are detrimental to the community (parent-initiated survey input and feedback are ignored)

Field study work and interviews were completed to develop the SWOT analysis (Strengths, Weaknesses, Opportunities and Threats), which is a tool to facilitate the key elements around which strategies, options and recommendations can be articulated. It can be viewed in the full report.

## PART 2 – PROPOSED SOLUTIONS AND RECOMMENDATIONS TO GOVERNMENT

1. **Competition for students.** In areas such as SDG where there is a significant francophone population, competition for students is having a demonstrable negative impact on the quality of education and opportunities for students to be educated close to home. Students have become commodities for competing school boards. Steps to reduce/eliminate competition include:
  - a. Consolidate the current four publicly funded school systems into a new publicly funded system for each official language (English and French). By following the lead of other provinces, Ontario can improve equity of access across rural Ontario, improve the sustainability of rural schools and their communities and achieve opportunities for cost-savings province-wide.
  - b. Ban explicit advertising campaigns used by school boards to poach students from other school boards. Such campaigns represent a gross misuse of public funds.
  - c. Existing inequities in current funding models should be analyzed and addressed – students should be funded at the same level regardless of language and/or religion.
2. **Daycare availability.** The availability of daycare, either full time or before/after school programs, should be reviewed by the province. Ten-year enrolment data for SDG indicates a lack of available daycare spaces. It is noted that French language school boards are able to offer significantly more daycare spaces in their elementary schools as compared to the English language school boards.
3. **Schools as community assets.** As part of the Pupil Accommodation Review (PAR) process, co-terminus boards must be mandated to review alternatives to school closures by demonstrating that other options (e.g. sharing facilities with other school boards, community groups, creating a community hub for health, social services, etc.) have been analyzed. Municipalities must be engaged in this process to ensure that current statistics and trends are available (e.g. housing starts, growth in settlement areas, etc.) and are accurately captured. Similarly, revise existing legislation to create a system where school facilities are jointly owned by school boards and municipalities to maximize the use of these public assets by community groups and local taxpayers. Increased access to existing facilities will enhance quality of life by increasing available programming and services to residents in small population centres.
4. **French Immersion programming.** In SDG, the lack of French Immersion programming is a clear determinant in whether a school thrives or closes. Some schools offer French Immersion programming, while others do not. Using metrics similar to those employed by the province in determining where to provide French language services to the public, should be considered; a review of how/where French Immersion programs are provided is warranted.
5. **Secondary School Specialized Programming.** In rural areas such as SDG, programs such as the Specialist High Skills Major, Cooperative Program, and the Ontario Youth Apprenticeship Program are very valuable and should be reviewed to remove any existing barriers (e.g. transportation) to maximize student participation.
6. **Transportation.** The Ministry of Education should adopt a provincial school transportation policy limiting ride times for students, reviewing efficiencies and sustainable transportation alternatives that align with provincial health strategies aimed at reducing childhood obesity and keeping community schools open in rural areas where students can bicycle or walk to school. It is not

uncommon for students in SDG to be bussed to schools an hour and a half from their residence twice per day. School boundaries must be included as part of this review.

7. **Internet access and technology.** Students across SDG face serious disadvantages in the area of both internet connectivity and access to at-home/in-school Information Technology (IT) resources. School boards should ensure that they are adequately supporting students and providing an equitable learning environment by furnishing IT hardware (such as laptops and tablets) to all students. With the emerging expectation that each student must complete two online courses to graduate, school boards need to better support students in the digital age by investing in ‘learning commons’ spaces which provide both a physical space and digital access for students.
8. **Transparency and Public Service.** The Ministry of Education must commit to Ontario Public Service (OPS) Standards for communication, feedback and complaint processes, by developing appropriate policies and procedures to improve parental engagement, restore trust in public education, and shift the administrative mindset and institutional culture towards public service. Students must be reprioritized and made the prime focus of education once again.
9. **Ontario Student Bill of Rights.** Adopt an Ontario Student Bill of Rights to access equitable educational opportunities, funding, transportation, and quality educational services (instruction and assessment) with teacher expertise in subject content areas.
10. **Public Engagement.** The province should develop and implement a “grassroots to government” view rather than the current top-down model for pupil funding policies, pupil accommodation review guidelines, and community partnership protocols, where parents, advocacy groups and municipalities create submissions, templates and frameworks for the Minister of Education and school boards to adopt. Doing so will create efficiencies and hasten the speed of change.

## Conclusion

It is critical that the rights of students and parents are acknowledged and respected through authentic consultative processes with school board personnel with meaningful and reciprocal exchanges and a variety of data reviewed. Consultation needs to be rooted in oral and written submissions that are shared with all parties and the public.

All policies and decisions must reflect evidence-based processes and open and transparent financial implications and explanations that are logical and meaningful to both school boards and the community within the context of a public service provision model of quality and excellence, and not a business model of cost effectiveness and bottom-line savings, at the cost of the best interests of students, families and the community.

Policy updates need to be more nimble than legislative changes which are complicated and require government and political will to influence and parliamentary process which is cumbersome and prone to significant time delays. Updates need to be evidence based with data, research, analysis and impact statements, demographic and trend information, be authentic and relevant to the target audience to which it applies.

While some federal funding in official languages education (minority and second language) does flow to the provinces, the majority of education funding is driven by taxpayers in every province.

The best solutions come from parents, teachers, residents and students in local communities as lived experience provides a source of ideas and initiatives. Collaboration with all sectors and authentic engagement will lead to better learning experiences for students and vibrant school communities in small population centres.

This Executive Summary is an abridged version of the full report which contains appendices with data, statistics, survey results, information sources and references used in the production of the report.



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October 1, 2021

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## ABSTRACT

The migration of people from rural communities to urban centres has been a global trend since the middle of the 20th century. Rural agricultural regions have faced limited growth and development, resulting in steadily declining school enrollment for over 40 years due, in part, to families having fewer children, overall declining birth rates in the Canadian population and resident mobility in search of employment.

Declining school enrollment is evidenced by school closures, school board amalgamations and student transportation to schools further away from a student's place of residence. More recently, the restructuring of educational service provision, programs and student support services and the emergence of online and virtual platforms as a means to access education during the global COVID19 pandemic have given rise to new meanings for school, education and community.

This report investigates the challenges and opportunities for educational planning in the present and into the future, by all stakeholders who benefit from quality public education services offered to students regardless of their place of residence within the province of Ontario, or by extension, any province in Canada. Strategies include local, provincial and federal initiatives and funding related options which can be engaged to prevent rural schools from closing.

If the expression "It takes a village to raise a child" is applied to education, then all entities including municipalities, non-profit organizations, service clubs, health institutions and businesses all have a voice and a role in the development and promotion of education in their region.

The results and recommendations in this report are intended for rural county councils to develop new educational initiatives within regional government, provincial government recognition of required support to students with a lens on equity in funding programs and services to increase best practices at school boards, and for local, provincial, national and international cooperation to enhance educational opportunities for all students.

## BACKGROUND

The United Counties of Stormont, Dundas and Glengarry ("SDG") in Ontario, Canada has a population of 66, 000 distributed over six rural municipalities. The elected body of County Council, issued a call for proposals for an education improvement project titled *Improving Rural Education in Stormont, Dundas and Glengarry* counties on February 5, 2021. (**Appendix 1**)

The education project was one of five key priorities identified in the Council's strategic plan 2019-2022 under the heading *Rural Schools- Educating Children in Their Communities*, in alignment with the guiding principles of: "*Our residents are our first priority, no municipality gets left behind, partnerships as essential for our success and our environmental legacy is important*". These principles are encompassed under a Mission "*to create better communities*" and a Vision "*to be a progressive regional government*". "*The County is committed to working with the province, local school boards, parents and other stakeholders to develop strategies that maintain the vibrancy of our rural schools*".<sup>1</sup> (**Appendix 2**)

Horizon Educational Consulting was selected as the candidate agency to fulfill the project's mandate and objectives and an agreement was signed on March 18, 2021. The duration of the project was four months from April 1, 2021 to July 30, 2021.

## INTRODUCTION

Canada remains only one of a handful of countries in the world with no national education framework. Based on the constitutional right of public (sectarian) and Catholic education systems to exist since 1867 when Canada officially became a country in its own right, the shift from religious authorities overseeing schools before and after 1867 to provincial government oversight was the first major shift in the educational landscape.

The second shift occurred with the recognition of self-determining governance of French language schools provincially. In the province of Ontario, the restructuring of school boards in 1997<sup>2</sup> and the creation of four publicly funded school systems (English Public, English Catholic, French Public, French Catholic) has led to a continuous shift in education demographics over the last twenty years.

Indigenous students remain under federal jurisdiction for education as opposed to provincial jurisdiction. Changes to aboriginal self-determination and control over education are evolving, as these existed only on designated reserves. However, many indigenous students still go off reserve to pursue secondary (high school) education and to access programs and opportunities in the public education system which are not available in on-reserve schools. Ontario's Indigenous Education Strategy<sup>3</sup> aims to improve equitable access to education and educational outcomes for First Nation, Inuit and Métis students.

School board funding also underwent a major shift from municipal governments overseeing taxation rates related to education at a local level, to a process shifting it to provincial jurisdiction and centralized funding processes.

The dynamic of a four- school board system operating within a region of low population growth has created more competition for students. Aggressive public and social media marketing campaigns have been employed by some school boards to attract parents and students.

The increased interest for choice in schooling options by more involved parents and adolescent students choosing programs of interest with peers offered in different schools are also factors in the development of new solutions.

New data is required to measure the impact of these changes to inform new strategies, create new initiatives and opportunities for students; to demand compliance to existing policy, legislation and service standards for public education to maintain equity and to create new policies and changes to existing legislation where none exist, to enhance the delivery of educational programs and services.

The premise of community ownership of schools by citizens and taxpayers is also a new perspective which presumes school boards to be stewards of the schools in their operational structures but partners with the community and businesses to ensure the vitality and maintenance of each school in the context of the social fabric of each rural community.

Declining enrollment in the school system in Ontario has been a characteristic trend since the mid 20<sup>th</sup> century due to Canadian families having fewer children<sup>4</sup>. Canada is a country with a consistently declining birth rate which is the reason why the country relies heavily on immigration to sustain economic growth and the stability of health, education and social services. While immigration remains a federal responsibility, provincial and municipal governments can access funding from federal initiatives and programs to support local communities.

## STATEMENT ON CONSULTANT'S INTELLECTUAL PROPERTY

The ideas, solutions, options, strategies and recommendations in this report are strictly the intellectual property of this consultant and may not be used without permission and proper source citing to this report to maintain integrity to the original concept and the articulation of these ideas. Any other idea proposed which is not original to this Consultant is credited within the endnotes of the report.

## ACKNOWLEDGEMENT OF INDIGENOUS TERRITORIES

The field work undertaken to complete this study included the traditional territory of the Haudenosaunee (Iroquois), Mohawk, Haudenosaunee (St. Lawrence Iroquois) and Huron-Wendat<sup>5</sup>. This territory is covered by the Upper Canada Treaties. This report honours the people and their valuable past and present contributions to this land.

## DEFINITIONS

Defining urban and rural areas and understanding geographical context is essential when speaking to issues related to access to education, quality education, educational opportunity and transportation.

Statistics Canada revised its definition of urban and rural designations in a new departmental standard which became effective in January 2017:

*The Population Centre and Rural Area Classification 2016 provides standard names and codes for Canada's population centres (POPCTRs) and rural area (RA). A classification variant provides the standard names and codes for POPCTRs and RA by province and territory.*

*...The term 'population centre' replaced the term 'urban area'. A population centre was defined as an area with a population of at least 1,000 and a density of 400 or more people per square kilometre. All areas outside population centres continued to be defined as rural area.*

*Secondly, population centres were divided into three groups based on the size of their population to reflect the existence of an urban-rural continuum:*

- *small population centres, with a population of between 1,000 and 29,999*
- *medium population centres, with a population of between 30,000 and 99,999*
- *large urban population centres, consisting of a population of 100,000 and over.*

*While other classifications were possible, the intent of this set was to provide users with a basic starting point to better understand the dynamic landscape of Canada.*

*Users of the former urban area concept are still able to continue with their longitudinal analysis using population centres.*

*These changes were meant to improve interpretation of Statistics Canada data and help users in the study of the Canadian urban-rural landscape and its issues.*

*In 2016, two new criteria were added to the delineation rules for population centres: the use of a secondary population density threshold as well as employment density.<sup>6</sup>*

When applying these standards to communities within the six municipalities, only one community meets criteria for a medium population centre (Cornwall: 47,000). All others are considered small population centres.

**Access to education** is the ability of a student to attend a physical school building or other virtual learning environment, obtain instructional and assessment services, obtain support services related to learning and enter into a reciprocal engagement of teaching and personal feedback on learning from an accredited\* teacher in Ontario, whether this access is through in person instruction, remote synchronous contact (teacher and student can communicate in real time with video chat or via phone) or asynchronous online contact (teacher and student communicate in writing).

**Quality education** must incorporate the following factors:

- students being taught by accredited teachers in Ontario, having the proper qualification to teach in the appropriate division (primary, junior, intermediate and senior)
- teachers having sufficient training to meet the needs of a student within their role and area of responsibility
- teachers having expertise and experience in their subject matter to enhance the quality of the pedagogical service offered to students
- additional qualifications and professional development undertaken by the teacher to offer additional knowledge to students in a subject matter or skill set defines high quality
- teachers offering students educational opportunities which extend beyond the instructional core curriculum and designated learning setting (classroom, lab, school) to further internalize the learning and mastery of the subject, skills, concept or knowledge for the student.
- Teachers who exemplify the standards and ethics of the profession and engage in a continuous professional learning framework as articulated by the Ontario College of Teachers (the regulatory body of the teaching profession in the province of Ontario)<sup>7</sup>.

*\*Every teacher employed by a publicly funded school board employer in Ontario must be licensed to teach by the Ontario College of Teachers, the regulatory body of the teaching profession in Ontario, with their name and qualifications appearing on the public registry at [www.oct.ca](http://www.oct.ca)*

**Educational opportunity** is any circumstance which offers a qualitative or quantitative measure of learning benefit to a student regardless of age or grade. Examples of such opportunities include extra-curricular activities, clubs, programs, services, field trips, exchanges, community volunteer work, travel, internships, apprenticeships, job shadowing, training, paid work or unpaid co-op placements (student job placements with employers for school learning credit).

## Barriers and obstacles

In the context of this study a barrier is defined as a situation over which a parent or group of individuals has no direct control and is difficult to change (for example: policy, legislation, lack of data, type of building construction).

An obstacle is defined as a situation in which there is a lack of initiative, motivation, understanding and/or empathy on behalf of an entity which requires a large amount of advocacy time and energy to overcome by a group of people, but can be more easily changed than a barrier (bias, stereotypes, assumptions, beliefs, fossilized practices).

This report aims to quantify and qualify main barriers in the maintenance of community schools and propose solutions to overcome those barriers with options and best practices that maximize local educational opportunities.

The Ontario Ministry of Education's 2006 *Equity Strategy*<sup>8</sup> set the following additional expectations of the learning environment for students which will also be referenced in this report:

*DIVERSITY: The presence of a wide range of human qualities and attributes within a group, organization, or society. The dimensions of diversity include, but are not limited to, ancestry, culture, ethnicity, gender, gender identity, language, physical and intellectual ability, race, religion, sex, sexual orientation, and socio-economic status.*

*EQUITY: A condition or state of fair, inclusive, and respectful treatment of all people. Equity does not mean treating people the same without regard for individual differences.*

*INCLUSIVE EDUCATION: Education that is based on the principles of acceptance and inclusion of all students. Students see themselves reflected in their curriculum, their physical surroundings, and the broader environment, in which diversity is honoured and all individuals are respected. (page 8)*

## METHODOLOGY

### Research

- i. Literature review on rural school closings (provincial, national, international perspectives)
- ii. Media articles related to school closings in Ontario and other Canadian provinces
- iii. Key data & statistics (Statistics Canada Census, Open Source government data, school board data)
- iv. Internet research
- v. Academic portal (Concordia, Western, Ontario Institute for Studies in Education, ResearchGate, Fraser Institute)
- vi. Parent advocacy groups' submissions
- vii. Municipal government and association submissions to the provincial government
- viii. Policy and legislative review of Education sector documents

#### Interviews with

- ix. SDG Education Working Group members in four meetings and follow-up calls
- x. Parents, educators, community members, academic contacts
- xi. Parent advocacy group contacts
- xii. SDG residents
- xiii. Horizon clients with children attending schools in SDG
- xiv. Local media sources and realtors

#### Field Study

- xv. Ground study via key routes to school sites (external only due to COVID restrictions)
- xvi. Aerial study to view transportation arteries and population density
- xvii. Contacting school and school board personnel
- xviii. Contacting Ontario Ministry of Education personnel
- xix. Attending English school boards' virtual Community Planning & Partnerships consultation virtual presentation
- xx. Attending virtual professional development conference sessions in education law, human rights and international rights of the child

#### Data Collection & Analysis

- xxi. Online adult surveys and student surveys disseminated to the communities in SDG
- xxii. Key school board website information
- xxiii. Immigration and tourism information
- xxiv. Analysis of key school board websites for program offerings and policies
- xxv. Analysis of municipalities' individual and collective websites

The mixed quantitative and qualitative method of research resulted in the proposal of ideas, options, solutions and recommendations in this report.

### **PART 1 – TRENDS AND CHALLENGES**

Prior to providing solutions, an environmental scan of existing data must be undertaken to understand trends related to student enrollment in rural areas.

Updated information was collected on the 10-year enrollment trend, capacity, utilization rate and facility condition index for all schools in the United Counties of Stormont, Dundas and Glengarry (SDG) within the four-school board context. This information is in **Appendix 3**.

Identifying challenges and issues raised by Council members, students, parents, grandparents and residents in SDG were provided through the call for proposal and through online survey results conducted from May to August 2021. This information was used to aid in the research and development of solutions, by quantifying and qualifying these issues.



1. The call for proposal listed these challenges:

- a) *Slow population growth*
- b) *Low population density throughout the region*
- c) *Large school boards encompassing most of Eastern Ontario*
- d) *Four school boards competing for students*
- e) *Pupil Accommodation Review Guidelines (PARG) incompatible with rural Ontario realities*
- f) *Shifting school boundaries, facilitating growth in some schools while 'choking off' others*
- g) *Inequitable per pupil funding formulas that create disparities among/between boards/schools*
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- j) *Provincial and board transportation policies that enable the bussing of students long distances from their home communities*
- k) *Funding formulas for new schools that favour larger facilities and disincentivize boards to share facilities*
- l) *Lack of maintenance of older schools*
- m) *Reluctance of coterminous boards to share facilities*
- n) *Pandemic impacts, specifically remote learning*
- o) *Reluctance of school boards to enter into community use agreements*

It also stated ***“County Council determined that the current educational model with the region is inefficient and does not generally serve children well, taking many of them out of home communities”*** (Appendix 1, page 2).

2. The Community Survey Results in Appendix 7 identified these challenges:

Challenges identified as Obstacles:

- *Same programs, courses not available at all high schools*
- *Large classes, split classes*
- *New start times, busing schedules, adolescents starting earlier than young children*
- *Incorrect facts or data used for school closures*
- *Quality of education /Arts programming and sports opportunities*
- *Mental health support to students*
- *Support to parents and consideration of families' needs*
- *Special education, access to assessments & professionals supporting disabilities*
- *Acknowledgment & consideration of community, educator and parental input*
- *Lack of support staff, quality of French Immersion teaching*
- *Diversity of staff and students*
- *Outdated texts and curriculum (Eurocentric) contributing to sexism and racism*
- *Lack of communication from teachers*
- *Unfair boundaries*
- *Virtual learning*
- *Access to after school activities, field trips, sporting events due to busing cost*
- *Transportation to coop placements*
- *Academic and applied courses in the same class*
- *Perception of rural students headed to vocational work after graduation*

### Challenges identified as Barriers:

- *Lack of internet or poor internet,*
- *Threat of school closures or school amalgamations*
- *Water quality*
- *Provincial funding formula*
- *Too many schoolboards*
- *Childcare availability*
- *Teachers' unions*
- *Accessible transit*
- *School ventilation and air quality*
- *Lack of Early Learning Centres*
- *Folding public and Catholic school boards into one school system*

### Consultant identified challenges

- i. School program information hard to obtain through school board website searches for parents seeking to relocate
- ii. Lack of diversity in school board leadership
- iii. Lack of data and /or reliable data (one source only- school board data)
- iv. Municipal council members' perception of having a limited role in providing educational input
- v. Internet services -access and signal quality
- vi. Obtaining information directly from school staff and school board personnel
- vii. Student trustees having a restricted role in feedback as key clients of educational services
- viii. School boards' perception of education monopoly over decision-making (transportation, costs, programs, school builds) business focused rather than service focused (bottom line vs client satisfaction)
- ix. Disconnect between regional employment sectors (energy, environment, manufacturing) and duplication of program offerings in Specialist High School Majors; no data on whether school boards are meeting the need for student skills training for sector employment
- x. Lack of school board policy to support decisions which are detrimental to the community (parent-initiated survey input and feedback are ignored)

### **Rural Schools SWOT Analysis (Strengths, Weaknesses, Opportunities and Threats)**

Field study work and interviews were completed to develop the SWOT analysis, which is a tool to facilitate the key elements around which strategies, options and recommendations can be articulated.

They are not intended to be prioritized in the way they are presented in the chart below since these are starting points for planning and follow-up action.

Strengths can be used for encouraging population relocation, while weaknesses are signalled as calls to action.

Threats are areas the Ontario Ministry of Education must address to diminish the threat.

Opportunities are offered as strategies for further solutions.

## SWOT Analysis of Rural Schools

### Strengths

Green space (forests/ conservation areas)

Outdoor recreation opportunities

Quality of life (low density, close to nature)

Lower housing & property costs

Lower taxes

No visible pollution

Good road infrastructure

Historically significant communities (National Historic sites and provincial heritage plaques)

Less turnover in teaching staff in rural areas because staff live and work in local school catchment areas (more invested in students)

Smaller schools add greater social emotional value to learning (teachers know all students and build rapport over the years)

### Opportunities

Tourism to attract population migration

Immigration and refugee populations data and resettlement to increase student population

Economic Immigrants to invest in rural communities

Increasing municipal role in educational opportunities and initiatives

Business sector supporting educational opportunities

### Weaknesses

Visibility of school information to the public

School board websites not designed within a public service framework (accessibility, ease of navigation, finding information promptly through the search function, accessing a person when making inquiries)

Limited housing units (rental, sale, temporary)

Lack of data from school boards to support community partnerships and school profile information

Lack of student voice

Conservation areas as key educational settings

Provincially and federally funded initiatives in education not highlighted on school board websites (programs, services, employment)

Initiating collaboration & connections with school boards for student learning opportunities

### Threats

Low birth rate, declining enrollment

School board competition for a fixed pool of students (aggressive social media and advertising campaigns by French language school boards)

Inadequate internet infrastructure

Perception of rural schools as low performing and therefore low priority

Lack of EarlyON Child Care Centres

Lack of Ministry oversight of school boards through inspections (inequity with private

COVID pandemic relocations

Exploring alternate data sources from other agencies (child protection, health units, social services, hospitals, youth justice) as they also intersect with school boards

schools which require inspections to operate and public schools which are not inspected but are funded through taxpayers)

Municipalities collect taxes for education but do not share ownership of school buildings which are solely under school board ownership and operations

Parent advocacy efforts are the only means leading to change

Education perceived by school board managers as a business, not as a public service

## PART 2 – PROPOSED SOLUTIONS TO IDENTIFIED CHALLENGES

### 1.a) Slow population growth

Source: 2016 Statistics Census data<sup>9</sup>

### b) Low population density throughout the region

Source: 2016 Statistics Census data

Type of challenge: Barrier

#### Proposed Solutions:

Low birth rate resulting in declining school enrollment

#### Increase population migration to rural areas through inter-Ministerial collaboration

- International students
- Economic immigrants
- Immigrants & Refugees
- Tourism
- Urban resident relocation post COVID

*“Ultimately, declining enrolment contributes to diminishing educational services and resources across the English-language school sector, impacting in particular what small schools can provide.”<sup>10</sup>*

*“It is important to understand the enrolment numbers within the context of a declining school age population, which obviously has an impact on school enrolment. The number of Canadians aged 5 to 17 declined 6.6 percent between 2000 and 2015. Every province except Alberta (growth of 11.6 percent) recorded a decline in their school-aged population over this period.”<sup>11</sup>*

**1.c) Large school boards encompassing most of Eastern Ontario**

**d) Four school boards competing for students**

Upper Canada District School Board (UCDSB), Catholic District School Board of Eastern Ontario (CDSBEO), *Conseil scolaire de district catholique de l'Est de l'Ontario*, (French Catholic- CSDCEO) *Conseil des écoles publiques de l'Est de l'Ontario* (French Public- CEPEO)

Type of challenge: Barrier

Legislation enshrined rights (section 23, Charter of Rights and Freedoms for Minority Language Education Rights)

Constitutional right to exist for Catholic school boards (1867) and funding for Catholic school boards in Ontario (*Education Act*);

Constitutional Law legal review required for compliance with United Nations Decision on Discrimination in funding Catholic Schools in Ontario<sup>15</sup>

**1.e) Pupil Accommodation Review Guidelines (PARG) incompatible with rural Ontario realities**

Source: *Fewer School Boards Act, 1997*<sup>12</sup>

Media articles:

<http://www.oneschoolsystem.org/>

Source: examples of advertising and promotion to students and parents to attract students to French language school boards (**Appendix 4**)

Federal government funding protocols: *Official Languages in Education Program* (OLEP)<sup>13</sup>

*Action Plan for Official Languages 2018-2023*<sup>14</sup>

**Proposed Solutions to Correct Inequity:**

- **Ontario provincial government to table and adopt new legislation to have one publicly funded system for each official language (English/French) to follow the model used in Quebec, New Brunswick, Newfoundland, Prince Edward Island and Nova Scotia; move to partial funding only as an interim measure such as Manitoba and British Columbia until compliance is achieved with United Nations Court decision confirming Canada's discrimination regarding funding of Catholic schools**
- **Ministry of Education memorandum to direct school boards to only inform communities regarding school registration but ban advertising campaign practices with the intent of poaching students from English language boards using taxpayer funds**

Source: *Pupil Accommodation Review Guidelines Ontario Ministry of Education 2016\**, (revised 2018)<sup>16</sup>

**g) Inequitable per pupil funding formulas that create disparities among/between boards/schools**

**i) Inequitable per student transportation funding**

**j) Provincial\*\* and board transportation policies that enable the bussing of students over long distances to access schools**

Type of challenge: Barrier

Lack of accountability framework from the Ministry for school boards to develop equitable transportation policies, public feedback opportunities and consider hardships for families and students in revising policy

Source: *Ontario Ministry of Education Technical Paper 2021-2022*<sup>17</sup>

**\*\*No transportation policies exist at the provincial level to accompany funding, as confirmed by Ministry of Education staff**<sup>18</sup>

**Proposed Solutions:**

- **Ministry of Education to adopt flexible funding formula based on community needs as submitted to school boards and forwarded to the Ministry of Education by parents, community groups and municipalities**
- **Ministry of Education to adopt a Grassroots to Government model of consultation through school boards with Ministry approval of funding directly to municipalities and school boards based on submissions outlining needs**
- **Enshrine transportation as a student right to access education for students in rural areas and adopt transportation policies at the Ministerial level which reflect local realities and ensure transparency and accountability**
- **School boards and the Ministry of Education to respect data and evidence provided by parents, community groups and municipalities to support efficiencies and equity and implement evidence-based efficiencies.**

\* A summary of changes made to the 2018 version prepared by the advocacy group Community Schools Alliance is presented below. No further changes are imminent at the time of writing of this report.

- “1. Initial Staff Report to have at least 3 options including status quo instead of “one or more”*
- 2. Initial Staff Report to follow ministry-approved template (under development)*
- 3. Each option in Initial Staff Report to address 4 impacts:*
  - *Student programming*
  - *Student well-being*
  - *School board resources*
  - *Local community*
- 4. “Impact on the local community” to include consideration of local economy if at least one school eligible for RNEF [Rural Northern Education Funding]*
- 5. Minimum number of public meetings increased from 2 to 3*
- 6. Final Staff Report must include secondary school student feedback*
- 7. Extra public meeting within 20 business days if new school closure introduced in Final Staff Report*
- 8. Within 5 days of trustee approval of review, notices sent to Head of affected councils and CAO [County Administrative Officer] with invitation to meeting*
- 9. Minimum time between first and final of 3 or more public meetings increased from 40 to 60 business days*
- 10. Modified review prohibited if one or more schools in review qualify for RNEF*
- 11. New section to describe Administrative Review process and conditions”<sup>19</sup>*

**1. f) Shifting school boundaries, facilitating growth in some schools while ‘choking off’ others**

Source: Open Source enrollment data (2011-2021); Pupil Accommodation Review reports from school boards; parent anecdotal accounts; survey results

**h) Inequitable distribution of programming among schools**

Source: parent anecdotal accounts, review of school site and program offering via school and school board websites; review of school board policies on transportation and local student transportation consortium information, survey results

**j) Provincial and board transportation policies that enable the bussing of students long distances from their home communities**

Type of challenge: Obstacle

**Proposed Solution: Ministry of Education to draft and provincial government to enact a Student Bill of Rights to access equitable learning opportunities in their own community (similar to a Patient’s Bill of Rights in the Health care sector)**

School board decision-making is restricted to one source of data to fit messaging to elected trustees; public and parent input not

used to revise proposals, public delegations to school boards are denied, school board senior administration and elected trustees do not visit school site locations to better understand community challenges prior to report drafting and final decision-making, information disseminated to the public is embedded in school board websites, consultation is information sharing in nature and not authentic reciprocal engagement

Greater choice of schools and programs available in the community for parents and students to choose from in a four- school board context

Parent volunteer and elected officials' capacity cannot keep pace with advocacy needs and the constant demands of monitoring school board activity and reports.

**1.k) Funding formulas for new schools that favour larger facilities and disincentivize boards to share facilities**

Source: anecdotal accounts, Infrastructure investments by the Ministry of Education, Ministry of Education Facilities Partnership Guideline<sup>20</sup>

**l) Lack of maintenance of older schools**

Source: school board School Information Profiles (SIP)<sup>21</sup> which indicate facility condition index, current capacity and utilization rates

**m) Reluctance of coterminous boards to share facilities**

Source: Ministry of Education Facilities Partnership Guideline, anecdotal comments

**n) Reluctance of school boards to enter into community use agreements**

Type of challenge: Obstacle & Barrier

**Proposed Solution:**

Changing the mindset that education is not a business with a bottom line that requires cost efficiencies (one size fits all and macro economics) but a public service with value for money investment in students and service to clients and the community;

- **Amend legislation to joint ownership and management of schools by municipalities and school boards**
- **School boards to manage operations of schools during school day hours and municipalities to manage school**



organizational mindset and school board identity and brand

The barrier is the ownership of schools by school boards as assets; taxpayer funded assets should have shared responsibility with municipalities

### **1.n) Pandemic impacts, specifically remote learning**

Type of challenge: obstacle

Internet service provision in rural areas  
Lack of social interaction necessary for learning for students leading to disengagement from learning

Quality of learning is diminished (contact time with a teacher and minimal support services)

**buildings before and after school hours, weekends and holidays**

- **Education to be viewed as a public service and not a business and public assets shared with the community as funded by taxpayers**

Source: Toronto Sick Kids' Hospital study on the state of mental health of students during the COVID19 pandemic<sup>22</sup>

### **Proposed Solution:**

- **Improving internet access and quality to be under the responsibility of the Ministry of Education incorporated through Ontario Infrastructure projects**  
<https://www.ontario.ca/page/building-ontario>

## **2.2 Quantifying and qualifying the issues identified as challenges**

Quantifying challenges requires data collection and analysis in order to challenge single sourced information and data produced by school boards to justify decision making. Establishing such a database relies on gathering information from alternate sources such as the health sector, social services, justice, business, service providers and municipalities. Collaboration with all sectors is essential to producing a holistic impact statement on the adverse effects of school board decision making within current practices which negatively impact students, parents and communities.

Ontario's *Education Act* and the Ontario Ministry of Education have limited compliance frameworks for school board transparency and accountability and the Ministry has a hands-off approach to school board operations, as these entities are corporations or agents of the Ministry. A 2015 report from the Office of the Auditor General of Ontario reviewed oversight and funding issues in a value for money audit

[https://www.auditor.on.ca/en/content/annualreports/arreports/en17/v1\\_308en17.pdf](https://www.auditor.on.ca/en/content/annualreports/arreports/en17/v1_308en17.pdf) .

The Ontario Ministry of Education is the only Ministry which does not display an Ontario public service commitment statement on its website. Complaints by parents are often rerouted back to school boards which have no formal complaint mechanisms. School boards are also not obligated to track data, particularly for information most useful to parents and the community. Thus, there is no impetus to respect public service standards to clients (parents and students).

The *Education Act* contains permissive language (“may”, “should”, “could”) in regulations with limited scope for compliance (“will”, “shall”, “must”). Reporting to the Ministry is an expectation, as is compliance with policy and regulation. However, there are no penalties, consequences or repercussions to school boards if these are not followed. School board senior administration do not face personal disciplinary, pecuniary or legal action for poor decisions with negative outcomes for students.

Performance measures within school boards are not common practice yet. Legal action and human rights tribunal application proceedings have brought changes to some practices and policies within school boards and realigned some administrative behaviour, however at great personal cost to parents and taxpayers who fund legal defenses of school boards while parents pay out of pocket.<sup>23</sup>

These processes also take an inordinate amount of time and rarely positively impact a student once the process is completed after 5-10 years of litigation.

While the Minister of Education has oversight of school boards in principle, active intervention is engaged only when public outcry occurs, often revealing dysfunctional school board governance, abuses of power by school board administrators (student suspensions, expulsions, issuing trespass letters to parents who advocate on behalf of their child) and most recently, school board legal action against parents for exposing racism<sup>24</sup>.

Increased media news articles provide the qualitative evidence of challenges faced by parents and students in making school boards more transparent and accountable. Efforts to communicate with school board staff or seek public data and information are often met with no response, a dismissive response or a refusal to provide the information. Responses to such requests are often scripted replicas offered by each school board acting in solidarity with one another. **Appendix 6** provides evidence of this practice in the pursuit of specific school profile data requested from school boards within the context of this research report.

Data collection for quantitative analysis for this report was provided through online student and adult surveys and qualitative analysis was obtained through lived experiences of parents through phone interviews and survey comment sections. **Appendix 7** highlights the survey results.

### 2.3 Goals and Next Steps to Consultant Identified Challenges

- i. School program information hard to obtain through school board website searches for parents seeking to relocate (**GOAL: improve information dissemination practices NEXT STEP: inspect all school board websites for accessibility, search functions by parent interest criteria (contact information for staff, programs in schools) and navigation features.**
- ii. Lack of diversity in school board leadership (**GOAL: improve hiring practices NEXT STEP: outsource administrative hires to external human resource agencies using equity and diversity principles, geographic proximity, experience and expertise as key criteria encouraging mobility within the sector and urban /rural relocations.**
- iii. Lack of data and /or reliable data (one source only- school board data) (**GOAL: improve information sharing practices between sectors. NEXT STEP: mandate school boards to**

- use research and data collection best practices to reflect multiple perspectives on data used for decision-making.
- iv. Municipal council members' perceived limited role in providing educational input (**GOAL: establish a link from citizens to school boards to communicate community interests. NEXT STEP: establish an education committee or education liaison person on municipal councils**)
  - v. Internet services -access and signal quality (**GOAL: Ministry of Education to assume responsibility to align with online learning access. NEXT STEP: create budget line**)
  - vi. Obtaining information directly from school staff and school board personnel (**GOAL: eliminate gate-keeping practices at school boards and increase accountability. NEXT STEP: Ministry of Education to mandate school board compliance with the Ontario Public Service Standard for Communication, Feedback & Complaint processes**)
  - vii. Student trustees having a restricted role in feedback as key clients of educational services (**GOAL: give students a voice as primary clients of educational services. NEXT STEP: Change the voting age in Ontario to 16 years of age to allow voting rights for student trustees in school board decision-making (to align with the minimum age for driving).**)
  - viii. School boards' perception of education monopoly over decision-making (transportation, costs, programs, school builds) business focused rather than service focused (bottom line vs client satisfaction) (**GOAL: change school board mindset from a publicly funded private corporation with complete autonomy to a client services mindset. NEXT STEP: remove the word " business" from Ministry of Education and school board positions, operational division name, policy documents and financial statements**)
  - ix. Disconnect between regional employment sectors and program offerings in Specialist High School Majors and Ontario Youth Apprenticeship Programs; no data on whether school boards are meeting the need for student skills training for local sector employment. (**GOAL: improve volunteer, co-op education placements and youth employment opportunities to keep students employed locally. NEXT STEP: local business associations to work in conjunction with school boards, students, parents and residents to align school- based SHSM and OYAP programs with local business and economic initiatives to support existing and developing employment sectors. Create intermunicipal student exchanges with different school board partners for students to explore out of area employment sectors of personal interest.**)
  - x. Lack of school board policy to support decisions which are detrimental to the community (parent-initiated survey input and feedback are ignored) (**GOAL: improved transparency and accountability to the community. NEXT STEP: school boards and Ministry of Education to adopt practices aligned with Ontario Public Standards in Communication, Feedback and Complaints processes.**)

Solutions to survey identified challenges are embedded in the above information.

## **2.4 Priorities identified through meetings with the Education Working group**

### **a) Transportation**

In 2017 the Ministry of Education released a discussion paper on improving student transportation. <https://www.ontario.ca/page/discussion-paper-new-vision-student-transportation#section-0> . Wellness and Equity formed part of the topics addressed. Submissions were made by various groups. One example was related to access to French Immersion programs in small population centres. The submission from Canadian Parents for French Ontario can be found in **Appendix 9**.

A 2015 report from the Office of the Auditor General of Ontario reviewed oversight and funding issues related to transportation

[https://www.auditor.on.ca/en/content/annualreports/arreports/en17/v1\\_308en17.pdf](https://www.auditor.on.ca/en/content/annualreports/arreports/en17/v1_308en17.pdf)

A follow-up on how school boards and consortiums implemented some recommendations from the report is found in **Appendix 10**.

**A review of how local school boards implemented changes by the Ministry of Education is required to see how the right of a student to attend a school more accessible to their home, as a right articulated under the Education Act, Part II, School attendance paragraph 35 is aligned with local school board transportation policies. (Appendix 11)**

**A Child's Right based approach to school transportation (currently it is considered a privilege) and the community advocacy incorporating United Nations Human Rights High Commission policy on the 17 sustainable development goals<sup>25</sup> into domestic legislation is a necessary first step in addressing these issues locally. However provincial legislative changes are required.**

### **b) Programming**

#### **French Immersion**

Funding for French Immersion programs per student are based on a minimum 50% of the day spent in English and 50% of the day spent in French language instruction (150 minutes of the 300 minutes total instructional day). Schools in which this model is implemented are called “dual track” schools. Funding is the same regardless whether school boards increase the French language instructional hours in the program or not. <https://on.cpf.ca/files/2021/05/Tab-8-Hours-of-French-Instruction-and-Funding-Graphs-Elementary-2021-2022.pdf>

French Immersion program growth in Ontario is on par with French language school growth in enrollment at the elementary school level. Participation rates in French Immersion programs in the UCDSB and CSDBE0 are at 39% and 40% respectively, one of the highest in the province. <https://on.cpf.ca/files/Tab-1B-EFI-of-French-Daily-by-Board-JK-12-Total-FI-Enrolment-by-Board-2018-2019.pdf>

**More Ministry funding for French Immersion can be accessed by school boards by having more school sites designated dual track French Immersion program sites in rural areas.**

**Dual track schools are currently viable schools in small population areas as indicated by enrollment data over the last 10 years for SDG. In addition, schools having child care sites with French Immersion programs are the most viable elementary schools. (Appendix 3)**

### **International languages**

The Ministry of Education provides additional funding to elementary and secondary students who wish to learn a language other than English or French.

[http://www.edu.gov.on.ca/eng/curriculum/secondary/International\\_Languages\\_en.pdf](http://www.edu.gov.on.ca/eng/curriculum/secondary/International_Languages_en.pdf)

**These languages can be those of family ancestry or other additional languages for students in high school interested in Specialist High School Majors in Arts & Culture, Tourism, Hospitality or Business. The programs can be offered after school or on weekends.**

Culturally inclusive language learning may strengthen community identity and heritage (for example Scottish Gaelic, Dutch, German origins in SDG)<sup>26</sup> and is inclusive and equitable to refugee and immigrant families who wish to maintain their language and culture (Urdu, Arabic, Tamil, Filipino, Mandarin). Often, these families arrive in Canada already knowing more than one language (other than French or English) and want their children to access learning in both official languages as well as maintain their own language<sup>27</sup>.

**English as a second language (ESL) funding is available concurrently to French as a Second Language (FSL) funding as they are not mutually exclusive. In fact, a student who recently arrived in Canada in French Immersion receiving ESL support and being transported to school generates the most amount of funding to a school per student, above the base student funding model<sup>28</sup>.**

### **Native Languages & Indigenous Culture**

Funding is available for school boards for native languages and students can study a native language in elementary schools and secondary school which can be substituted for French or can be in addition to French<sup>29</sup>.

Indigenous culture awareness has been infused in all subject areas of the elementary and secondary school curriculum in Ontario<sup>30</sup>.

Survey results indicated some interest in this area as the proximity of the Aknesasne first nation territory and students who self-identify with languages in the Audenosaunee (Iroquois), Mohawk, Haudenosaunee (St Lawrence Iroquois) and Huron-Wendat languages.

**Indigenous programs are a means for school boards to access additional funding from federal and provincial funding sources and provide enhanced learning opportunity for all students in rural areas, especially those of aboriginal ancestry, but also those who wish to access aboriginal language and culture under the Equity, Diversity and Inclusion framework.**

### **Specialist High School Major (SHSM)**

**In reviewing school and school boards websites, more work needs to be done to improve the visibility, relevance to students and surrounding economy and exploring partnerships with businesses for co-op student placements with SHSM programs.**

A gap analysis is needed to find out which SHSM programs should be placed in which high schools with a review or realignment to follow. More information on SHSM and its importance is found in Appendix 8.

### **Special Education**

**Survey results indicate the highest demand for programming is meeting the needs of students with learning challenges (Appendix 7) and this funding needs to be monitored for equitable distribution by school boards to all students who require additional support for learning.**

Under the Ontario Human Rights Code<sup>31</sup> students with special needs have a right to support which meets their needs so that they have equitable opportunities for academic success as their peers.

School boards have a duty to accommodate these students “to the point of undue hardship” which is a very high threshold that is rarely met by school boards.

Vigilance and monitoring by parents are essential to ensure these students are accessing adequate program support, regardless of the language of instruction (students in French Immersion have equal rights to support as those in the English program).

It is also essential that students be formally identified as students with special needs through the Identification, Placement, Review Committee (IPRC) process of the *Education Act*, to ensure that school boards meet their obligations in the duty to accommodate, which does not just entail the creation of an Individual Education Plan (IEP) for the student<sup>32</sup>.

Informing parents of their rights and students’ rights is key to ongoing monitoring.

### **Virtual learning**

**Survey results conducted for this report indicate that students aged 12 and over prefer in person learning by far (Appendix 7). Toronto’s Sick Kids’ Hospital study on mental health also reiterated the importance of in person learning for all students but younger students in particular<sup>33</sup>. While a very small number of students found virtual learning experiences positive, publicly available data shows that virtual learning for most students was a negative experience and it must never be the default delivery model of instruction in Ontario schools.**

**The COVID19 pandemic clearly illustrated the need for more access to virtual learning opportunities for students in small population centres where internet services and or family income to access internet services did not permit a positive learning experience.**

While the government of Ontario has announced that virtual learning options will remain for elementary and secondary students<sup>34</sup>, this model of instructional delivery should be reserved for exceptional cases where students are unable to attend school due to medical reasons or severe anxiety related to learning in schools, generally related to sensory processing disorders which are exacerbated in school learning environments.

**Above all, school boards must provide home instruction to students unable to attend school in person and/or virtual learning equipment and internet facilitation devices if their families cannot afford the service in their home. Survey results indicate that the Ministry of Education should fund equipment and internet for virtual learning, particularly since the government has indicated two credits are to be earned through virtual learning by students prior to graduation.<sup>35</sup>**

### **Offering synchronous virtual learning for courses at a different high school**

Survey results once again indicated that the UCDSB school board decision to change school start times earlier for high school students and later for elementary students on the premise of offering equitable access to synchronous online learning (teachers livestreaming lessons to students via video) for high school students to access courses available at other high schools simultaneously, requires further review. It was also stated that another reason was to provide high school students access to part-time employment after school with an earlier dismissal time. This reason **was not substantiated by student survey results. (Appendix 7)**

While the principle of enabling simultaneous courses at another learning site appears equitable, **the rationale for the earlier school start time for adolescents has ignored education research which indicates that this age group is more engaged with learning later in the morning and thus they should start later rather than earlier. The same research concluded that younger children learned best with an earlier start time to school.<sup>36</sup>**

No consultation occurred with parents or students and email feedback and survey results by parents submitted to school boards on the topic of the hardship to families with finding childcare when older siblings are no longer available in the morning to mind younger brothers or sisters and put them on the bus or take the bus with them, has been largely ignored. **Finding child care in small population centres is also far more limited than in larger population centres and presents an additional obstacle and inequity for families in SDG.**

Cost cutting reasons cited by the school board for the bell time changes without publishing the savings in detailed financials is questioned. There is no evidence of cost savings if two busses would now go to a family's home instead of one previously in some communities for siblings in both elementary and secondary with different start times (parent anecdote). **The lack of transparency in school board decision-making has downloaded a new cost to families for child care while dismissing student and parent feedback on the consequences these decisions have for families and communities. (Appendix 7)**

### c) Equity

In order to study school board decision and policy making, a study of the 2013 policy for Equity Diversity and Inclusion (EDI) PPM 119<sup>37</sup> emanating from Ministry of Education's *Equity and Inclusive Education Strategy 2006* and its implementation through to 2012 was undertaken with a view to explore how many policies were updated to comply with this new directive.

Highlights of the policy are presented in **Appendix 12** and starting points indicated below for further action.

**First, equity must not be confused with equality. The latter indicates sameness for every person but equity means every person gets what he or she needs to be able to access, perform or acquire what everyone else can.**

Second, the following principles from the Strategy must drive all policy review at school boards.

*Guiding Principles of the Equity and Inclusive Education Strategy:*

- *is a foundation of excellence;*
- *meets individual needs;*
- *identifies and eliminates barriers;*
- *promotes a sense of belonging;*
- *involves the broad community;*
- *builds on and enhances previous and existing initiatives;*
- *is demonstrated throughout the system*<sup>38</sup>.

An example of equity is allowing international students to study in Ontario schools and obtain an Ontario Secondary School Diploma. However, in order to achieve that academic goal, they are supported through English as a Second Language (ESL) classes upon arrival until their language skills allow them to fully participate in all other subject classes.

International students pay tuition to local school boards in the same amount as what school boards receive in funding for local students, since school boards are not for profit corporations under provincial government and cannot charge more for tuition fees.

**However, more international students generate extra funding to a local school and benefit the students attending from the community. More funding brings more staffing allocations which in turn can offer more extra-curricular activities for all students (clubs, sports teams, trips) that are not funded by the Ministry of Education and are undertaken by teaching personnel as a professional courtesy and personal interest in enhancing the student experience at school.**

**Investing effort in attracting international students to rural community schools is a direct investment to local students and the community at large, as these students have disposable**



**income from their families abroad. International students also bring diversity and inclusion to small population schools and students can experience reciprocal perspectives on locales, customs, language and cultures<sup>39</sup>.**

**An example of inequity is a school not offering French Immersion or not offering day care or before/after school care on site.**

Examples of local inequities in SDG schools are documented in Appendix 13.

**Inequitable practices at school boards include policies not revised to reflect EDI principles, parent or student feedback not considered, student trustees unable to vote on school board decisions, community consultation which is information dissemination only, and lack of community use of schools.**

**Of particular note is that the *Strategy* includes language indicating school board compliance expectations (“*School boards will...*”). It is an expectation that all school board policy should be reviewed with an equity lens and compliance with the strategy. EDI principles should drive all policy review.**

The application of equity principles to provincial policies and guidelines such as the Ministry’s *Pupil Accommodation Review Guidelines* and the *Community Planning and Partnerships Guidelines* are outlined at the end of this report.

#### **d) Health & Wellness**

The health and wellness of students came to the forefront in the last two school years due to the imposed restrictions caused by the COVID19 pandemic which closed schools for extended periods of time and forced students into online learning platforms. Neither teachers were prepared to teach, nor students were prepared to learn, or equipped to use, this mode of instructional delivery.

**The pandemic did allow simultaneous research to be engaged and Toronto’s Sick Kids Hospital tracked data from children and youth from March 2020 to June 2021<sup>40</sup>. Ontario saw the longest school closure period and the data has revealed the negative impact on student learning and student well-being.**

**Testimonials from teachers and parents indicated there was very little mental health support for students while schooling abruptly opened and closed on short notice and pivoted to virtual learning.**

While the Ministry of Education allocated further funding for mental health supports for the 2020-2021 and 2021-2022<sup>41</sup> school years, very little support was experienced by students.

In addition to lack of in-person schooling, many students were unable to pursue extra-curricular activity at school or in the community. This loss has added to the diminished physical and mental health of students as evidenced by survey anecdotal results in the comments section.

**The student survey results in Appendix 7 indicated they prefer to walk or bike to school (81.82%) and go to school close to home, which supports a provincial health strategy to reduce childhood obesity<sup>42</sup>.**

Transportation travel times by school bus which is the mode of transportation to school for 73.16% of students in SDG according to survey results, negatively impacts physical health and mental health as travel for some students was up to 2 hours per day (anecdotal comments).

This significant loss of time made engaging in extra-curricular activity nearly impossible and reduced the quality of life for both the student and the family. Changing bell times announced for implementation in September 2021 by the UCDSB school board has caused additional hardship to families who are all travelling to work or school at different times, eroding quality of time together as a family for 5 days out of 7 days of the week.

**School board decisions made without the best interest of students in mind contribute to diminished physical and mental well being of children and youth.**

**The Ministry of Education must engage in research to establish the causal link between how local school boards complied with the 2006 Equity Strategy and the 2013 EDI policy and its impact on the current mental health of students.**

One can hypothesize that school boards who complied and implemented all of the strategies were better prepared in supporting student when COVID19 restrictions came into force as they would have had organizational capacity and direction to support students. Where policies and practices were already in place, students may have fared better in coping with pandemic restrictions and virtual learning.

**Poorly implemented or limited implementation of the strategy and policy may have created more mental health issues for students in certain school boards. Parents did provide testimonials that mental health support staff had been removed from schools prior to the start of the pandemic.**

**It would be expected that the Ministry of Education with its branch dedicated to Health and well-being would capture this nexus between boards and policy implementation and better serviced students. (Appendix 14)**

**Not implementing the 2006 Equity Strategy by 2012 and not being compliant with the 2013 EDI policy may have contributed to increased mental health and deteriorating wellness for students up until the pandemic (bullying issues, exclusion of special needs students, suspensions) and the lack of services throughout the pandemic;**

Critical questions related to equity and mental health supports remain:

- are mental health nurses allocated to all schools, including small population schools?
- did a lack of mental health support lead to greater suffering for students during the pandemic?

- does data from local health units show correlation between agency statistics and lower student mental health in local conditions and poverty?

#### e) Sharing of space between co-terminus school boards

**This difficulty resides in the branding and identity which each school board assigns to its image. While it may have been a practice for two different school boards to engage in shared space in the past, it may be harder to achieve within the current climate of greater competition between school boards for students.**

The *Education Act* permits different school boards to use a school building as a shared space and for students to access schooling in a school closest to home (see Appendix 11), however the complexities of shared space by two different school boards to deliver educational services requires more research and data to capture successes and challenges of these arrangements. **The difficulty in obtaining this information from school boards is a barrier to dealing with this issue.**

**Alternatively, recommendations on how to optimize unused space in an under-capacity school building by other education related professionals (speech language pathologists, occupational therapists, mental health professionals, child care providers) is a more viable option to maximizing building function and enhancing services to students and the community.**

The Ottawa-Carleton District School Board Dedicated Space pilot project (First Ave PS) allowing private therapists into schools to provide ABA therapy to students with Autism is one such precedent setting initiative which has been very well received by parents.

#### SUMMARY

**It is critical that the rights of students and parents are acknowledged and respected through authentic consultative processes with school board personnel with meaningful and reciprocal exchanges and a variety of data reviewed. Consultation needs to be reciprocal exchanges of oral and written submissions that are shared with all parties and the public.**

All policies and decisions must reflect evidence-based processes and open and transparent financial implications and explanations that are logical and meaningful to both school boards and the community within the context of a public service provision model of quality and excellence, and not a business model of cost effectiveness and bottom-line savings, at the cost of the best interests of students, families and the community.

**Policy updates need to be more nimble** than legislative changes which are complicated and require government and political will to influence and parliamentary process which is cumbersome and prone to significant time delays. **Updates need to be evidence based with data, research, analysis and impact statements, demographic and trend information, be authentic and relevant to the target audience to which it applies.**

**The “best interest of the child” is the new guide for creating policy and in policy review, by standards set in the international community incorporating the United Nations International Rights of the Child<sup>43</sup>** and supported by the continued work of the University of Ottawa Interdisciplinary Research Laboratory on the Rights of the Child <https://droitcivil.uottawa.ca/interdisciplinary-research-laboratory-rights-child/> .

**Changing organizational mindset and behaviour in school board practice is an obstacle that requires continued advocacy efforts to deconstruct perceptual or real bias, stereotypes, fossilized practices and approaches to decision-making and information dissemination to parents and the community.**

New meanings for school, education and community engagement are evolving, so school boards must understand that it is not just parents and students as clients who are engaged, but that the parent community is supported by the business community, service clubs, non-profit organizations, local media and key community leaders.

**Engaging the student voice to promote educational objectives is key to success in changing school board practices.** Using precedent situations from other regions in Ontario such as students voicing disagreement with ‘quadmasters’ and having the Toronto District School board reverse its decision for September 2021, due to student voices is strategically significant advocacy<sup>44</sup>.

Similarly, the reversal of school board decisions on closing two rural schools in the Thames Valley District School Board in 2018 through community advocacy is also precedent setting<sup>45</sup>

Advocacy must have a multipronged approach locally and provincially with multiple stakeholders to be most effective.

**Empowering parents with accurate information, data, research and successful initiatives in other communities shifts the paradigm from “asking” school boards to demanding more appropriate resolution and improved services for students.**

Finally, urban out migration caused by COVID19 pandemic restrictions and citizens searching for greater space and quality of life options presents a unique opportunity for SDG communities to capitalize on new residents adding their voice to advocacy to ensure their children get what they received in urban school, within their new communities. Reasons for population migration include less costly housing, more space, less pollution, quality of life, less congestion, traffic, green space and smaller schools.

## **RECOMMENDATIONS TO THE MINISTER OF EDUCATION AND GOVERNMENT**

Ontario’s *Education Act* is revised on an as-needed basis and does not undergo systemic review in a cyclical manner. Regulations that are outdated or do not align with new Equity, Diversity and Inclusion principles must be reviewed and updated.

The Purpose of the Education Act and its regulations are:

## *PURPOSE*

### ***Strong public education system***

*0.1 (1) A strong public education system is the foundation of a prosperous, caring and civil society. 2009, c. 25, s. 1.*

### ***Purpose of education***

*(2) The purpose of education is to provide students with the opportunity to realize their potential and develop into highly skilled, knowledgeable, caring citizens who contribute to their society. 2009, c. 25, s. 1.*

### ***Partners in education sector***

*(3) All partners in the education sector, including the Minister, the Ministry and the boards, have a role to play in enhancing student achievement and well-being, closing gaps in student achievement and maintaining confidence in the province's publicly funded education systems. 2009, c. 25, s. 1.*

<https://www.ontario.ca/laws/statute/90e02#BK0>

The lack of Ministry oversight in school board compliance to policies and regulations as noted in reports by the Office of the Ontario Auditor General<sup>46</sup> has led to parents, the public and municipalities sounding the alarm in lack of transparency in information sharing, collaboration and consultation practices at school boards. The lack of openness and accountability goes against the public mandate of public service and maintaining Ontario Public Service Standards<sup>47</sup>.

While the *Act* confirms education as a public service,

### ***Ministry continued***

*2 (1) The ministry of the public service known in English as the Ministry of Education and Training and in French as ministère de l'Éducation et de la Formation is continued. 1997, c. 31, s. 3.*

**Most school boards do not acknowledge, recognize or subscribe to the Ontario Public Service Standards which applies to corporations, agents and third-party consultants to the Ministry<sup>48</sup>, as they ascribe themselves corporate status separate from the Ministry's identity. In doing so, their organizational behavior adopts a business-like corporate stance, engaging with the public as publicly funded private corporations.**

**As indicated earlier in this report, the Ministry of Education is the only Ontario Ministry that does not post a public statement of commitment to these Standards on its website. Having school boards conform to standards that the oversight branch of government does not commit to, is a significant obstacle, particularly when a major component of these Standards is communication and feedback processes on services.**

- 1. Recognizing partnerships that are articulated in Ministry policy but not in the *Act* itself is another example of educational dissonance subject to further gap analysis:**

- a) Protocol for partnerships with external agencies  
[https://www.tcdsb.org/ProgramsServices/SpecialEducation/SpecialEducationPlan/SpecEdPlanDoc/21\\_Protocol\\_for\\_Partnerships\\_with\\_External\\_Agencies\\_PPM149\\_rev.pdf](https://www.tcdsb.org/ProgramsServices/SpecialEducation/SpecialEducationPlan/SpecEdPlanDoc/21_Protocol_for_Partnerships_with_External_Agencies_PPM149_rev.pdf)  
 Protocol for partnerships with Parents as partners in education  
[http://www.edu.gov.on.ca/eng/parents/involvement/FS\\_PE\\_PolicyEn.pdf](http://www.edu.gov.on.ca/eng/parents/involvement/FS_PE_PolicyEn.pdf)
- b) Community partners in bullying prevention

*“8. Communications and Outreach Strategies*

*To support a whole-school approach, boards must actively communicate their policies and guidelines on bullying prevention and intervention to principals, teachers, and other school staff; students; parents; their Special Education Advisory Committee; school councils; and school bus operators and drivers. Boards should also provide this information to their Parent Involvement Committee, their Indigenous Education Advisory Council, and other appropriate community partners.”*

<http://www.edu.gov.on.ca/extra/eng/ppm/144.pdf>

2. **A further example of a gap is the funding of technology versus textbooks, which are now largely out of use. While assistive technology for students with special needs (Special Equipment Allocation) is funded by a specific envelope of funding, more broad-based technology for all students, including access to technology is not a feature in regulations.**

The Ministry had to compensate during the pivot to remote learning through the COVID19 pandemic by ensuring students had access to a laptop. Despite this effort, internet access was still a significant obstacle for many students and families with multiple children in participating in remote learning. Survey results quantify this obstacle and indicate public opinion that the Ministry of Education should be responsible for this aspect of educational learning. (Appendix 6)

School sites should be repeater sites for enhanced internet capacity in small population areas and this requires collaboration and effort between municipalities, service providers and school boards to ensure better services for residents and students. **Internet service and laptop provision should be a provincial budget line for school boards if remote learning is implemented with mandatory credits assigned to it for high school graduation, which is a correlated commitment required for students to achieve this requirement.**

3. Collaboration between municipalities and school boards must be mandated by a Ministry policy, however, human behaviour dictates the success or failure of such initiatives. Engagement in collaboration is best obtained by repeated invitation to any interested individual within school board personnel since senior administration, school principals and teachers are often overwhelmed with meeting obligations. Public calls for this participation within the community and students is much more fruitful in obtaining an

interested individual. Informing parents and the community of school board consultations in the community is best taken on by municipalities with identified staff or committees with whom school boards feel more obligated to contact for initial notification.

4. Transparency and accountability are compellable since taxpayers fund educational services provided by school boards. Working with professional auditors in the community and the Office of the Auditor General of Ontario to continue signalling concerns at local and provincial levels by questioning school board data and fiscal assumptions is necessary and joining forces with other advocacy groups locally and provincially strengthens messaging and calls for action. Information sharing between groups makes advocacy more effective. Board delegations by such groups cannot be refused by school boards under the public service standard of feedback mechanisms.
5. Conducting bias reviews for school board policies (or lack thereof) of programs, transportation and school closures provides data for provincial corrective action. Information has power to change when it is corroborated from different sources and helps remove educational dissonance in policy and practices at school boards.
6. Insisting on research-backed staff proposals must be undertaken and reports challenged if no references to such background information has not been completed. Such reports should be qualified as void in status if not substantiated by policy or research or students/parent testimonials or data (survey). Lack of active research being used by school boards when it is supported by the Education Act and institutions such as the Ontario Institute for Studies in Education in Toronto, as well as many other universities Ontario and Ministry funded grants to do research in school boards, must be brought to the attention of the Minister of Education.
7. **Addressing delays in revisions to government initiatives such as the Rural Education Strategy, Community Planning & Partnership Guidelines and the Pupil Accommodation Review Guidelines requires a flipped approach where grassroots advocates prepare the desired template or model with recommendations for government to adopt.** A flipped model ensures that a local perspective is captured, or a shared challenge across many communities is addressed in a manner that most impacts the community and its students.

Presenting the Ministry with solutions from a grassroots approach to change policies which is not top-down Ministry directed (waiting for a template that never comes) or government directed (no action near elections) but community directed, with ministerial response to proposals (faster timeline, not dependent on elections and govt priorities as students wait for solutions) is more efficient and enables a response to proposed solutions.

8. Alignment of all Ministry of Education policies to the Equity Diversity and Inclusion principles must be verified by an audit requested of the Ontario Auditor General.
9. A Child's Right based approach to schools and community incorporating International Human Rights Commission policy into domestic legislation for the Ministry of Education to revise is vital to restore faith in the public education system.
10. Union interference through collective agreements which deter from the students' best interest (staff turnover due to absence, illness, leaves, timetables, preparation time, subject expertise) must be addressed with those organizations by the Minister of Education.
11. Increasing the role and importance of the student voice and the Ontario Association of Student Trustees as partners to municipalities, not sidelined or ignored (token student trustees with no voice, include voting rights for student trustees in school board meetings, and including them in municipal youth advisory roles).

## CONCLUSION

The literature review for this study revealed interesting options used in other countries however international solutions do not work locally primarily because of how education is structured under provincial authority with no national framework for education.

While some federal funding in official languages education (minority and second language) does flow to the provinces, the majority of education funding is driven by taxpayers in every province.

The best solutions come from parents, teachers, residents and students in local communities as lived experience provides a source of ideas and solutions.

For this reason, a template is provided which outlines a simplified 'grassroots to government' model for public communication and consultation with school boards as agents and service providers of the Ministry of Education.



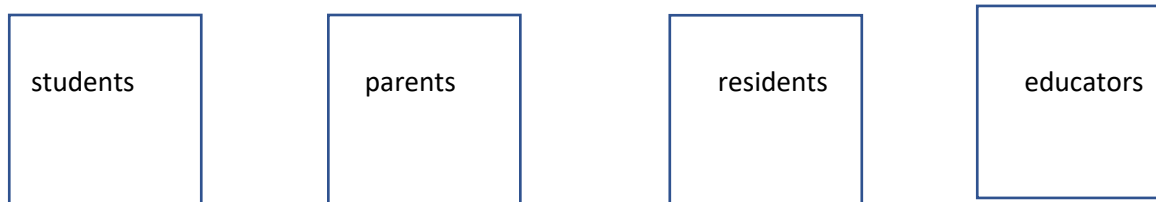
## **A SAMPLE TEMPLATE FOR COMMUNICATION AND CONSULTATION ON A PROVINCIAL RURAL EDUCATION STRATEGY**

### **GRASSROOTS TO GOVERNMENT MODEL**

- 1. STEP 1 – SCHOOL BOARD NOTIFIES COMMUNITY OF A CHALLENGE  
OR  
COMMUNITY NOTIFIES SCHOOL BOARD OF A CHALLENGE**

*(NOTIFICATION OCCURS THROUGH WEBSITES, MEDIA, SOCIAL MEDIA, DIRECT  
EMAILS, DELEGATIONS, COMMUNITY NETWORK)*

- 2. STEP 2 – EITHER PARTY SEEKS FEEDBACK FROM EACH GROUP**



- timelines are advertised at time of notification, subject to the severity and urgency of the challenge
- sample timelines could be 2 weeks to 4 weeks for notification, 3-6 weeks for feedback
- feedback includes written submission, video presentation, survey data, written testimonials, in person meeting, site visits

- 3. STEP 3 –ALL FEEDBACK IS CATALOGUED, DOCUMENTED AND PUBLISHED ON  
SCHOOL BOARD / MUNICIPALITY WEBSITES OR VIRTUAL DEDICATED SPACE  
ACCESSIBLE TO THE PUBLIC FOR REVIEW**

- sample timelines for review should be 4 weeks

- 4. STEP 4 –SECOND FEEDBACK OPPORTUNITY WITH RESEARCH, LEGAL REVIEW,  
POLICY IMPLICATION REVIEW, IMPACTS OF DECISION, EQUITY & BIAS  
REVIEW**
- 5. STEP 5 –STAFF REPORT / COMMUNITY REPORT**
- 6. REVIEW OF INITIAL REPORT**
- 7. VETTING OF INITIAL REPORT BY OTHER PARTY**
- 8. DECISION ON SOLUTIONS TO THE CHALLENGE**
- 9. PROPOSED CHANGES COMMUNICATED**
- 10. PROPOSED CHANGES ADOPTED, POLICY REVISED OR REMAINS STATUS QUO**

**RESULTS FORWARDED TO THE MINISTER OF EDUCATION**

## ENDNOTES

<sup>1</sup> SDG Strategic Plan, pages 1-2 (in Appendix 2)

<sup>2</sup> *Fewer School Boards Act, 1997*

<sup>3</sup> Ministry of Education, *Indigenous Education Strategy*

<sup>4</sup> Statistics Canada 2016 Census for Stormont, Dundas, Glengarry

<sup>5</sup> Haudenosaunee – This name refers to the Iroquois Confederacy comprising of these Nations: Mohawk, Oneida, Onondaga, Cayuga, Seneca and Tuscarora. *Traditional Territory Acknowledgments in Ontario*.

<sup>6</sup> *The Population Centre and Rural Area Classification 2016*

<sup>7</sup> Ontario College of Teachers *Professional Standards*

<sup>8</sup> Ministry of Education 2006 *Equity Strategy* (page 8)

<sup>9</sup> Statistics Canada 2016 Census for Stormont, Dundas, Glengarry

<sup>10</sup> Education Research Brief no.1 – *The Decline of Enrollment in Quebec's English Language School Sector* (Quebec English-Speaking Communities Research Network)

<sup>11</sup> Fraser Institute Report *Where Our Students Are Educated, Measuring Student Enrollment in Canada*, 2017(page 5)

<sup>12</sup> *Fewer School Boards Act, 1997*

<sup>13</sup> *Protocol for Agreements for Minority Language Education and Second Language Instruction 2019-2020 to 2022-2023 between the Government of Canada and the Provinces and Territories* – Council of Ministers of Education

<sup>14</sup> Action Plan for Official Languages 2018-2023: Investing in our Future

<sup>15</sup> United Nations World Court decision declaring funding of Catholic schools in Ontario as discriminatory

<sup>16</sup> Pupil Accommodation Review Guidelines 2016 and revised guideline 2018

<sup>17</sup> Ontario Ministry of Education. *Technical Paper 2020-2021*, page 118.

<sup>18</sup> Email with Ontario Ministry of Education staff July 9, 2021 confirming there are no provincial Ministry policies related to transportation funding

<sup>19</sup> Community Schools Alliance Power point presentation to Ontario Small Urban Municipalities 2018 conference (slides 8-12)

<sup>20</sup> Ontario Infrastructure projects/construction of new schools [and](#) Ministry of Education *Facilities Partnership Guideline*

<sup>21</sup> School Information Profiles (SIP) from UCDSB and CDSBEO and Open Source government data

<sup>22</sup> Toronto's Sick Kids Hospital *Sick Kids Releases new research on how COVID-19 pandemic has impacted child and youth mental, physical health*

<sup>23</sup> CBC News French public school board <https://www.cbc.ca/news/canada/ottawa/parents-lawsuit-against-school-board-alleges-racism-falsified-report-cards-1.6078805> CBC News York Region District School Board <https://www.cbc.ca/news/canada/toronto/york-school-board-lawsuit-1.5134169>

<sup>24</sup> CityTV News Peel District School Board <https://toronto.citynews.ca/2020/03/11/parents-say-peel-school-board-banned-them-from-schools-over-racism-claims/> CBC News Peel District School Board <https://www.cbc.ca/news/canada/toronto/peel-school-board-legal-action-black-advocacy-twitter-1.5621676>

<sup>25</sup> United Nations Human Rights High Commission policy on the 17 sustainable development goals

<sup>26</sup> Statistics Canada 206 Census for SDG – cultural origins and languages spoken and most spoken immigrant languages in SDG

<sup>27</sup> CBC News <https://www.cbc.ca/news/canada/manitoba/newcomers-to-canada-enrolling-children-in-french-immersion-1.1396457> ; Canadian Parents for French submissions to the Senate Standing Committee on Official Languages

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- <sup>28</sup> 2021-2022 Technical Paper, Ontario Ministry of Education funding allocations  
<http://www.edu.gov.on.ca/eng/funding/2122/2021-22-technical-paper.pdf>
- <sup>29</sup> Native language funding, 2021-2022 Technical Paper, Ontario Ministry of Education
- <sup>30</sup> *First Nations, Inuit & Métis Studies Curriculum*. Ontario Ministry of Education
- <sup>31</sup> Education as a service under the Ontario Human Rights Code
- <sup>32</sup> *Special Education in Ontario, Kindergarten to grade 12 Policy and Resource Guide (section D – IPRC process and section E -IEP)*
- <sup>33</sup> Toronto’s Sick Kids Hospital *Sick Kids Releases new research on how COVID-19 pandemic has impacted child and youth mental, physical health*
- <sup>34</sup> Ontario school boards must offer virtual learning in 2021-2022 <https://www.cp24.com/news/ontario-boards-must-offer-virtual-learning-as-option-for-entire-2021-22-school-year-ford-gov-t-says-1.5413676?cache=frpwuptdsnzlvp%3FclipId%3D89750%3Fot%3DAjaxLayout>
- <sup>35</sup> Mandatory online courses for high school graduation diploma  
<https://www.cbc.ca/news/canada/toronto/high-school-students-mandatory-online-courses-graduation-1.5368305>
- <sup>36</sup> Later start time for high school students in some school boards (Thunder Bay, Toronto, London)  
<https://www.cbc.ca/news/canada/thunder-bay/late-school-start-times-1.4251269>  
<https://www.hwdsb.on.ca/about/transportation-at-hwdsb/bell-time-study/>  
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- <sup>37</sup> Ministry of Education. Policy and Program Memorandum 119 (2013) *Developing and Implementing Equity and Inclusive Education Policies in Ontario Schools*
- <sup>38</sup> Ministry of Education, 2006 Equity and Inclusive Education Strategy
- <sup>39</sup> *Economic Impact of International Education in Canada 2017 update*. Government of Canada
- <sup>40</sup> Toronto’s Sick Kids Hospital *Sick Kids Releases new research on how COVID-19 pandemic has impacted child and youth mental, physical health*
- <sup>41</sup> Ministry of Education May 4, 2021 Memorandum to School boards on allocations for mental health support for students
- <sup>42</sup> Reducing Childhood Obesity in Ontario, provincial and federal strategy documents
- <sup>43</sup> Interdisciplinary Research Laboratory on the Rights of the Child, University of Ottawa
- <sup>44</sup> CBC Toronto students fighting ‘quadmesters’ <https://www.cbc.ca/news/canada/toronto/some-high-school-students-calling-to-scrap-quadmesters-1.6027636> <https://www.pressreader.com/canada/toronto-star/20210617/281543703877757>
- <sup>45</sup> Thames Valley District School Board Reverses school closing decisions <https://www.tvdsb.ca/en/our-board/EPAR01-school-closures-reconsidered.aspx>
- <sup>46</sup> Office of the Ontario Auditor General report on Ministry funding and school board oversight  
[https://www.auditor.on.ca/en/content/annualreports/arreports/en17/v1\\_308en17.pdf](https://www.auditor.on.ca/en/content/annualreports/arreports/en17/v1_308en17.pdf)
- <sup>47</sup> Ontario Public Service Standards
- <sup>48</sup> School boards as agents of the Ministry of Education for Ontario Public Service Standards compliance

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## ***Improving Rural Education in Stormont, Dundas and Glengarry***

**ISSUED:** February 5<sup>th</sup>, 2021

**CLOSING DATE AND TIME:** Friday, February 26<sup>th</sup>, 2021 @ 1:00 p.m.

**CLOSING LOCATION:** United Counties of Stormont, Dundas and Glengarry  
26 Pitt Street, Suite 323  
Cornwall, On, K6J 3P2

# Part A: Scope of Work

## Project Summary

The United Counties of Stormont, Dundas, and Glengarry ('SDG' or the 'County') is seeking Proposals from qualified Consultants to **develop a report quantifying/qualifying the main barriers to the maintenance of community schools within our region, and to propose solutions for overcoming those barriers.** There is a substantial body of literature confirming why educating children in or near their home communities is important, particularly from a social capital point of view. The intent of this report is therefore not to confirm what we already know, but rather to propose tangible policy solutions to make rural education in our region better.

Completing the report will require research as well as communication/consultation with local school boards, the province through the Ministry of Education, as well as stakeholders including parents, local municipalities and advocacy groups. **The document produced by the successful Consultant will be used by County officials as a tool to widely advocate for improvements in the education system in our region.**

## Background/Project Description

The United Counties of Stormont, Dundas and Glengarry is the easternmost County in Ontario, comprised of 6 local municipalities stretching from the Quebec border in the east to Iroquois in the west, and from the City of Ottawa in the north to the United States border in the south. Our upper-tier municipality is home to about 66,000 residents and is served by 4 publicly funded school boards – English public, English separate, French public, and French separate.

The existence of 4 school boards within our geographic area is a dynamic that has a significant impact on where children from our region are educated. **The successful Consultant must therefore consider this dynamic as part of their review however these school boards legally exist, and Consultants should develop their recommendations within the 4-board context.**

As part of the development of a new Strategic Plan in late 2019, County Council determined that the current educational model within our region is inefficient and does not generally serve our children well, taking many of them out of their home communities. The impacts (loss of social capital, negative economic impacts to rural communities, etc.) are well documented. To that end, Council determined that **"Rural Schools – Educating Children in Their Communities"** would be one of its 4 Strategic Priorities:

*While education is not within the purview of municipal government in Ontario, Council believes that the County and its constituent local municipalities have a significant and vital role to play in ensuring that our children are educated as close to home as possible. School closures not only have devastating impacts on children, but entire communities. Further, schools are the backbone of many of our communities. Smaller, rural schools provide a safe, welcoming place in which to educate children.*

*The County is committed to working with the province, local school boards, parents, and other stakeholders to develop strategies that maintain the vibrancy of our rural schools. Council*

*believes that all school boards must work together and collaborate with other stakeholder groups including municipalities, to develop local solutions and best practices that maximize local educational opportunities for our children.*

It is essential that all Proposals submitted **clearly demonstrate** knowledge of/experience with:

- Literature concerning rural education issues, not only in Ontario but nationally and internationally – lessons learned, and models/strategies developed in other jurisdictions that could be adapted and/or replicated in our region.
- Current or past initiatives of the province of Ontario specific to rural education.
- The multitude of players involved in the delivery of education in Ontario, including the province through the Ministry of Education, local school boards, children, parents, and advocacy groups such as the Community Schools Alliance. It will be critical that the successful Consultant can access the right individuals to obtain the necessary information/data that will be required to successfully complete this assignment.
- Working knowledge of Ontario's significant education policies/procedures including, but not necessarily limited to:
  - Pupil Accommodation Review Guidelines (PARG)
  - Shared space approaches and policies, both with coterminous boards and external user groups
  - Provincial and local board transportation policies and funding models
  - Funding models applicable to different school boards (e.g., English vs. French boards)
  - Other significant policies that impact rural education in SDG
- Experience with similar projects in the education sector, particularly Ontario.

In the context of education in the SDG region, **the following have been identified as challenges/issues.** Research will be required to quantify/qualify these issues to aid in the development of solutions. The list below is expansive and is provided for context only, as some are more significant than others.

- Slow population growth
- Low population density throughout the region
- Large school boards encompassing most of Eastern Ontario
- Four school boards competing for students
- Pupil Accommodation Review Guidelines (PARG) incompatible with rural Ontario realities
- Shifting school boundaries, facilitating growth in some schools while 'choking off' others
- Inequitable per pupil funding formulas that create disparities among/between boards/schools
- Inequitable distribution of programming among schools (e.g., French immersion programs, available sports programming, etc.)
- Inequitable per student transportation funding
- Provincial and board transportation policies that enable the bussing of students long distances from their home communities
- Funding formulas for new schools that favour larger facilities and disincentivize boards to share facilities
- Lack of maintenance of older schools
- Reluctance of coterminous boards to share facilities

- Pandemic impacts, specifically remote learning
- Reluctance of school boards to enter into community use agreements

As part of this assignment, the successful Consultant will also **complete an inventory of existing school inventory within SDG**, as below. This information will help inform the solutions presented in the report.

- List of all active schools in SDG by board, complete with grades offered
- List of schools where daycare, before and after school care, office space, leased space, or adult learning is offered, including details
- 10 years of enrolment data for each school
- Facility condition index of each school
- Current capacity and utilization rates

### **Inquiries**

**Please refer inquiries to:**

Mr. Timothy Simpson, Chief Administrative Officer

26 Pitt Street

Cornwall, Ontario K6J 3P2

**Phone** 613-932-1515 x 1202

**Email** [tsimpson@sdgcounties.ca](mailto:tsimpson@sdgcounties.ca)

### **Rejection of Proposals**

The County reserves the right to reject any and all Proposals received as a result of this request and to cancel this solicitation at any time prior to the execution of a contract.

### **Incurring Costs**

The County is not liable for any costs or expenses incurred by Consultants in the preparation or submission of their Proposals or for attendance at any meetings related to this Request for Proposal prior to the issuance of a contract.

### **Response Date**

To be considered, Proposals **must be emailed** to the individual listed above and received on or before **Friday, February 26<sup>th</sup> at 1:00 p.m.**, marked **'Improving Rural Education in Stormont, Dundas and Glengarry'**. Late submissions will not be accepted and will be returned to the sender unopened. **Due to the pandemic, Proposals will only be accepted electronically.**

### **Consultant Responsibilities**

Each Proposal must be signed by the individual representative(s) of the Consultant who has contracting authority. That individual will be the sole point of contact regarding contractual matters.

### **Proposals**

Proposals must be submitted electronically to Mr. Simpson as follows:

- 'Main Proposal' as a separate PDF attachment
- 'Financial Proposal - Appendix A' as a separate PDF attachment



The Main Proposal must include the following, and **be no longer than ten (10) pages in total length**:

- Two (2) professional references.
- An introduction detailing the Consultant's understanding of the project objectives and scope.
- A description of the Consultant's approach and details of the project.
- A summary of recent involvement with similar projects and the name, title, and telephone number of a reference for each of the projects listed - minimum 2.

The first ranked Proposal, having acceptable terms and conditions, will be recommended for award. If approved by County Council, the County will notify the successful Consultant in writing of the acceptance of its Proposal. The successful Consultant shall be bound to execute an agreement with the County within fourteen (14) days of being notified of approval.

### **Negotiations**

If a Proposal does not precisely and/or entirely meet the requirements of this Request for Proposal, the County reserves the right to enter negotiations with the selected Consultant(s) to arrive at a mutually satisfactory arrangement with respect to any modifications to the Proposal.

### **Written Agreement**

A written Agreement shall be executed by the successful Consultant and the County. The final terms and conditions of the Agreement will be negotiated between the successful Consultant and the County, and will include such items as payment schedule, scheduling of work, milestones, and completion date.

### **Standard Terms and Conditions**

While undertaking any work, the selected Consultant must adhere to all relevant Provincial/Federal legislation/regulations.

The Consultant shall not transfer responsibility to meet their contractual obligations to a third party without the consent, in writing, from the County.

The Consultant shall respect the confidentiality of the information collected or made available during the assignment.

The Consultant must certify that they have appropriate Health & Safety Policies in place and follow the requirements of Ontario Regulation 297/13 made under the OHSA.

The lowest cost, or any Proposal may not necessarily be accepted. The County reserves the right to reject any and all Proposals. The County, when evaluating the Proposals, will take into consideration related experience, proposed methodology, managerial capabilities, qualifications of the Consultant, and cost. In addition, the County reserves the following rights:

- To waive irregularities and informalities at its discretion.
- To negotiate or discuss the technical and financial content of the successful Proposal.

### **Insurance/Indemnity Requirements**

The successful bidder shall indemnify and hold United Counties of Stormont, Dundas & Glengarry, its employees, agents, etc., harmless from and against any liability, loss, claims, demands, costs and expenses, including reasonable legal fees, occasioned wholly or in part by any negligence or acts or omissions whether willful or otherwise by the bidder, its agents, officers, employees or other persons for whom the bidder is legally responsible.

**Prior to commencing any work hereunder, the successful Consultant must provide proof of insurance satisfactory to the County.**

A valid Ontario WSIB Clearance Certificate covering all employees of the Consultant is required prior to the commencement of any work.

### **Clarification or Inquiries**

Any clarifications or inquiries shall be sought from the County prior to the submission of the Proposal, no later than **Friday, February 19<sup>th</sup>, 2021 at 1:00 p.m.** Answers to all inquiries will be provided via written addendum to all Consultants who have received a copy of the documents. The response will be provided in a manner which will not identify who has requested the clarification. Amendments/clarifications/addendums to this request for Proposal shall take precedence over the portion which has been amended and shall be considered part of the contract.

### **Accessibility Standards for Customer Service, *Ontarians With Disabilities Act***

It is the Consultant's responsibility to ensure that they and all sub-consultants hired under this contract are in full compliance with Section 7 of Ontario Regulation 191/11, Accessibility Standards for Customer Service made under the *Accessibility for Ontarians with Disabilities Act, 2005* as may be amended from time to time.

### **Treatment of Information**

The information submitted in response to this request for Proposal will be treated in accordance with the relevant provisions of the *Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)*. The information collected will be used solely for the purposes stated in this request.

If the Consultant believes that any part of its bid reveals any trade secret, intellectual property, scientific, technical, commercial, financial or labour relations information or any other similar secret right of information belonging to the Bidder, the information **must be clearly marked as 'Confidential'**.

Any requests for access to submissions will be subject to a formal review based on MFIPPA requirements prior to the release of third-party information.

### **Project Upset Amount**

The upset amount for this project shall be \$60,000 exclusive of HST. Proposals exceeding this amount will not be considered.

## Part B: Proposal Evaluation

### **Validity of Proposal**

The Proposal shall remain valid for a term of sixty (60) days after the Proposal due date.

### **Evaluation Criteria**

Each consultant shall submit a Proposal which outlines their understanding of the Scope of Work of the project and shall address the criteria noted below. The County may elect to interview one or more of the respondents to further evaluate their experience, ability or understanding of the proposed work. Proposals will be reviewed and scored based on a consensus approach and a recommendation made to County Council based on the Proposal which attains the highest score from the evaluation criteria listed below.

County Council has final authority for the award of the work.

Proposals will be evaluated as follows:

### **Proposal Evaluation Criteria**

Category	Points Available
Consultant Experience	15
Consultant Qualifications	5
Proposed Methodology	50
Financial (Envelope 2)	30
<b>Total Available Points</b>	<b>100</b>

#### ***Consultant Experience with similar projects (15 points)***

*The Consultant shall provide a summary of similar projects which they have completed including references for the work.*

#### ***Consultant Qualifications (5 points)***

*The Consultant will provide curriculum vitae for key team members who will be working on this project, demonstrating the necessary experience to successfully complete the work.*

#### ***Proposed Methodology (50 points)***

*The Consultant will describe in detail their proposed approach to this assignment.*

#### ***Financial Proposal (30 points)***

*In a separate attachment, clearly labeled 'Financial Proposal – Appendix A', the Consultant shall provide the total contract price to complete the work, HST shown separately. Full points will be awarded to the lowest cost Proposal meeting all project requirements and other Proposals will be awarded points based on the following formula:*

$$1 - \frac{(nx - n1)}{n1} \times 30$$

Where:

$n_x$  is the dollar value of the proposed fee

$n_1$  is the dollar value of the lowest proposed fee

## APPENDIX A: FINANCIAL PROPOSAL

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Proposal Price

*The undersigned agrees to complete the project as detailed in the submitted Proposal for the following price:*

**Total Price to Complete the Project (Excluding HST)**

\$ \_\_\_\_\_

---

Name of Firm

---

Address

---

Name and Signature of Person Signing for the Firm

Position

---

Phone

---

Email

## The United Counties of Stormont, Dundas and Glengarry Strategic Plan

### **Mission, Vision, Principles, and Priorities**

**Mission:** *To create better communities*

**Vision:** *To be a progressive regional government*

#### **Guiding Principles**

Over the coming four-year term, Council will consider the following guiding principles to shape and inform decision-making and the implementation of its strategic priorities.

**1. Our residents are our first priority**

We are driven to provide quality services and to enhance the lives of our residents. The County is committed to finding efficiencies, enhancing communication, and developing our infrastructure to enrich the lives of those who reside within our borders.

**2. No municipality gets left behind**

The County embraces a 'community benefit model'. This model promotes the idea that as a regional government, the County has the unique ability to overcome local disparities based on geography and/or tax base/tax assessment in order to provide equitable services across the entire region. We are committed to improving services and finding solutions that serve the broader needs of the entire County. We creatively explore new ways to develop regional strategies that will sustain and build a more cohesive region – always ensuring that 'no municipality gets left behind'.

**3. Partnerships as essential for our success**

The County will continue to strengthen its longstanding relationships with municipal partners, other levels of government, and community organizations through open communication and the sharing of ideas and assets. We aim to collaborate appropriately in order to achieve the best results for our 65,000 residents.

**4. Our environmental legacy is important**

We are aware that many of our operations and lines of business have a significant environmental footprint. When considering the implementation of any strategic priorities, we will subscribe to the principles of long-term sustainability, mitigating the impact of climate change, and environmental stewardship.

## ***Strategic Priorities***

### ***1. Service Delivery – A Smarter Approach***

The County relies on a variety of municipal, quasi-municipal, and non-municipal partners to deliver an array of essential services to its 65,000 residents. These services range from land ambulance and policing to the management of County forests. At this time, opportunities exist for the County, its local municipalities, and the City of Cornwall to explore delivering services on a truly regional basis. Council is cognizant of the fact that many stakeholders are involved in service delivery, requiring commitment and support beyond the County to affect meaningful change.

For those services delivered to County residents by the City of Cornwall, Council is committed to working with the City to develop a new shared services framework, one that reflects the spirit of true partnership. Council will also work with local SDG municipalities on several initiatives to bring efficiencies to operations, including waste management, information technology, radio communications, tourism/economic development, as well as shared land use planning and engineering services. These efforts will result in better, more accessible, and more equitable services that enhance the quality of life of our communities.

### ***2. Rural Schools – Educating Children in Their Communities***

While education is not within the purview of municipal government in Ontario, Council believes that the County and its constituent local municipalities have a significant and vital role to play in ensuring that our children are educated as close to home as possible. School closures not only have devastating impacts on children, but entire communities. Further, schools are the backbone of many of our communities. Smaller, rural schools provide a safe, welcoming place in which to educate children.

The County is committed to working with the province, local school boards, parents, and other stakeholders to develop strategies that maintain the vibrancy of our rural schools. Council believes that all school boards must work together and collaborate with other stakeholder groups including municipalities, to develop local solutions and best practices that maximize local educational opportunities for our children.

### ***3. Leveraging Partnerships to Improve Healthcare – Supporting Equitable Access***

While health care is generally not the responsibility of local government, the County recognizes that it has a distinct role to play in enhancing the delivery and funding of long-term care, land ambulance services, and public health. Inequalities related to access to health care currently exist in our County, due in part to a shortage of physicians in rural areas. Further, due to the growing number of seniors in our region, we need to ensure affordable, quality local long-term care spaces are available to those in need. These challenges are not unique to our County but exist throughout most of rural Ontario.

The County will advocate for and support provincial initiatives that create better patient outcomes, such as implementing measures that reduce emergency room wait times or paramedic offload times. At the local level, Council will explore physician recruitment options with other regional partners, with the goal of providing greater access to local health care services. Additionally, Council will examine partnership opportunities that increase the quality and/or quantity of long-term care beds within our County.

#### **4. Community Sustainability – A Place Where You Want to Be**

Rural communities across Ontario and Canada continue to struggle to maintain the vibrancy of their communities in the face of an aging and sometimes declining population. Council will take direct action to create the conditions necessary to support vibrant and sustainable communities. Council will also advocate for a livable and thriving community and partner strategically with others to ensure accessible, high quality services for residents.

In areas such as access to high speed broadband (fixed and mobile) and natural gas, the County will continue its longstanding efforts to bring and maintain these crucial services to and for our residents. Further, the County will continue to work with and through the Eastern Ontario Wardens' Caucus on these files as well as others which are important to the rural residents of Eastern Ontario including affordable housing, youth retention, and building a skilled labour force.

#### **5. Communication – The Foundation of Success**

It is vital that the County effectively communicate with its residents and stakeholders. The ever-evolving nature of communication demands that the County explore new and innovative ways to ensure that it is communicating in a clear and timely manner while providing the public with appropriate platforms to engage with and provide feedback to the County.

To enhance its external and internal communication capabilities, Council will explore various options, including the expanded use of social media and digital platforms and human resources.



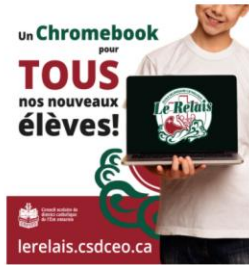
## Appendix A: Deliverables for Strategic Priorities

<b>Deliverables for Strategic Priorities</b>	
<b>STRATEGY</b>	<b>ACTIONS</b>
<b>Service Delivery</b>	Seek a new, fairer shared services agreement with the City of Cornwall
	Work towards developing a regional waste management strategy including the County, its local municipalities, and the City of Cornwall
	Provide high quality land use planning services to SDG local municipalities
	Explore the possibility of a common radio communications platform
<b>Rural Schools</b>	Seek to build better relationships with local school boards and with parents of students
	Advocate for the development of a rural education strategy
	Participate in a provincial feasibility study to enhance rural education
<b>Healthcare Partnerships</b>	Support EOWC initiatives around health such as reducing EMS offload times
	Explore options to better support long term care for SDG residents
	Explore partnerships with other municipalities and organizations concerning physician recruitment
<b>Community Sustainability</b>	Support EOWC and others on improving fixed and wireless broadband throughout SDG
	Advocate for natural gas expansion throughout SDG with Enbridge and other private and public entities
	Continued emphasis on active transportation (cycling, trails, etc.) and the development of quality infrastructure
<b>Communications</b>	Revamp SDG website - possibly in concert with local municipalities
	Enhance staffing resources to more effectively communicate externally and internally
	Expand social media presence and reach

School board	school	ID number	2020-2021*	2019-2020	2018-2019	2017-2018	2016-2017	2015-2016	2014-2015	2013-2014	2012-2013	2011-2012	grades	programs	OTG capacity	utilization rate	facility condition	index
B66311 CEPEO Alexandria	Rose des vents**	383392	539	525	515	483	481	465	449	439	410	415	JK-6	FFL/IB	information not provided by school board		3% (2017) 0% (2017) 4% (2017)	
	Terre des jeunes	383376	120	120	120	122	116	148	147	157	159	171	JK-6	FFL				
	l'Heritage-seconaire	907464	122	195	135	143	127	41	117	111	110	103	gr9-12	FFL/IB/Health/Environment				
	l'Heritage-intermediaire	302864	59	65	95	103	83	82	62	61	62	60	gr7-8	FFL/IB				
B67326 CSDCEO Moose Creek	Elda Rouleau (Alexandria)	753297	195	230	215	230	231	289	285	299	283	290	JK-6	FFL/Spanish after school	information not provided by school board		13% (2017) 39% (2017) 26% (2017) 38% (2017)	
La Source	725668	127	130	125	117	96	97	102	129	130	123	JK-6	FFL					
Marie-Tanguay	861367	379	400	385	409	411	394	391	377	368	359	JK-6	FFL/Spanish after school					
Notre Dame	737208	314	310	310	313	298	282	283	141	138	128	JK-6	FFL/Spanish after school					
Crysler	Notre-dame-du-rosaire	707465	134	125	115	93	84	79	73	68	65	64	JK-6	FFL	FFL/Ottawa67hockey academy/Impact Montreal Soccer Academy		29% (2017) 19% (2017) 4% (2017) 48% (2017)	
Long Sault	Sainte-Lucie	699373	n/a	250	255	248	223	233	237	240	228	183	JK-6	FFL/weekly art-tech-sport program				
North Lancaster	L'ange-Guardien	860443	160	175	180	174	184	236	242	244	248	183	JK-6	FFL/Hockey Academy/Construction/Health/Social Justice				
	La Citadelle	725684	400	360	380	372	401	418	457	497	513	514	gr9-12	FFL/Hockey Academy/Construction/Health/Social Justice				
Alexandria	El catholique Citadelle	723592	234	240	210	194	198	204	217	210	225	252	gr-7-8	FFL	FFL/Information Techno/Communications(new for 2021-2022)		5% (2017)	
	Le Relais	752908	135	140	160	180	183	187	181	182	209	234	gr9-12	FFL				
	EC IntermediairePavAlex	718815	90	85	85	81	83	0	0	0	0	0	gr-7-8	FFL				
B67172 CDSBEO																		
St. Raphaels Ingleside	Bishop Macdonnell	689610 (351)***	368	345	305	257	255	234	220	213	187	208	JK-6	dual track EFI	411 552	85.40% 116.70%	63% (2017) 0% (2017)	
	Holy Trinity	715190	644	530	520	536	535	523	537	502	501	532	gr7-12	dual track FI/agriculture, health & wellness, arts & culture				
	Holy Trinity Intermediate	821553	n/a	135	150	183	197	201	168	158	166	165	gr7-8	dual track FI				
	Iona Academy	696269 (169)	158	175	170	177	193	194	188	212	241	251	JK-8	EFI				
St. Andrew's West	Our Lady of Good Counsel	741361	236	255	225	209	197	131	131	123	119	129	JK-8	EFI	314 259 484 185	54% 91.10% 87.20% 108.10%	19% (2017) 5% (2017) 49% (2017) 19% (2017)	
	Sacred Heart	759040	422	425	375	216	219	233	236	222	222	268	JK-6	dual track EFI				
	St.Andrew's	769312 (200)	204	205	205	221	197	208	228	215	239	254	JK-8	English				
	St.Anne	771651	239	245	260	359	371	339	331	345	356	352	JK-6	dual track EFI				
Alexandria	St.Finnan's	806102 (127)	130	115	125	126	137	127	142	146	144	147	JK-6	JK-SK Extended, dual track FI 1-6	274 268 268 276	46.40% 82.50% 94.80% 59.10%	16% (2017) 10% (2017) 3% (2017) 7% (2017)	
Chesterville	St.Mary Catholic	828980 (221)	215	205	185	170	158	162	169	220	168	150	JK-6	JK-SK Immersion, dual track FI 1-6				
Morrisburg	St.Mary-St.Cecilia	830283	254	245	240	234	228	209	202	197	201	201	JK-8	English				
	St.Matthew Catholic HS	726176 (163)	102	110	115	120	119	111	120	113	102	95	gr9-12	English/construction, hospitality & tourism				
	St. Matthew intermediate	765428	51	50	30	<10	<10	<10	<10	<10	<10	<10	gr7-8	English	994	93.90%	26% (2017)	
	St. Joseph Catholic HS	806277	933	710	695	726	753	757	750	783	875	661	gr9-12	dual track FI/transportation,business				
	St. Joseph Intermediate	n/a	n/a										gr7-8	dual track FI				
	St. Peter	844713	189	180	200	138	138	146	146	163	158	176	JK-6	dual track FI				
B66192 UCDSB bussed from Alexandria	Chesterville PS	106283 (188)**	180	185	170	180	145	134	120	121	130	138	JK-6	dual track EFI/ daycare/before & after school care	179 308 280 282	105% (2019) 96% (2019) 67% (2019) 90% (2019)	37% (2017) 28% (2017) 47% (2017) 16% (2017)	
Iroquois PS	278149	296	325	340	329	318	321	333	297	283	279	JK-6	dual track EFI/before & after school care					
Laggan PS	303429 (187)	188	190	180	164	175	163	170	176	186	174	JK-6	dual track EFI/before & after school care					
LongueSault PS	320498 (253)	251	250	270	264	266	270	261	235	209	190	JK-6	dual track EFI/before & after school care					
	Maxville PS	349259	83	95	110	106	116	118	119	122	125	132	JK-6	English	831	54% (2019)	32% (2017)	
	Morrisburg PS	374474 (148)	149	150	150	133	142	146	144	151	171	186	JK-6	English/daycare/before & after school care				
	Nationview PS	382825 (251)	255	235	225	217	204	207	186	198	214	240	JK-6	dual track EFI/daycare/before & after school care				
	North Stormont PS	47180 (102)	100	95	95	81	82	67	72	79	90	113	JK-6	English/before & after school				
	Rothwell-Osnabruck PS	492957 (126)	121	130	135	156	236	233	237	269	278	311	JK-6	dual track EFI/before & after school care				
	Rothwell-Osnabruck DHS	932973	0	0	0	103	129	143	150	177	174	gr7-12	n/a school closed in 2017					
	Roxmore PS	28851	255	255	245	232	238	229	234	252	241	225	JK-6	dual track EFI/before & after school care				
	Williamstown PS	609285	349	355	370	379	342	344	318	323	306	297	JK-6	dual track EFI/before & after school care				
	Winchester PS	613150 (336)	331	385	410	421	436	420	419	386	353	311	JK-6	dual track EFI/before & after school care				
	Viscount Alexander	578444 (421)	423	455	450	436	439	432	392	386	363	387	JK-6	dual track EFI/before & after school care				
	Eamer's Corners	157376 (467)	462	455	440	424	398	429	423	419	399	363	JK-6	dual track EFI/before & after school care				
	Central PS	94846 (461)	467	480	465	451	431	464	437	449	497	523	JK-6	dual track EFI/daycare				
	Bridgewood PS	247005 (470)	488	485	500	521	510	0	0	0	0	0	JK-6	EFI/before & after school child care				
	Char-Lan DHS	897876 (325)	252	225	220	216	227	238	259	265	264	255	gr9-12	FI/Health & Wellness, agriculture indicated on UCDSB website				
	Char-Lan Intermediate	262508	103	105	100	92	88	88	97	85	91	107	gr7-8	FI				
	Glengarry DHS	913219 (283)	191	220	235	236	265	257	261	299	295	319	gr9-12	FI/hospitality/transportation-agriculture,health indicated on UCDSB				
	Glengarry - Intermediate	174498	78	70	65	72	80	95	92	78	70	68	gr7-8	FI				
	North Dundas Intermedia	153822	172	160	145	132	146	160	162	153	166	181	gr7-8	FI				
	North Dundas DHS	929590 (451)	278	290	300	311	309	320	354	379	434	489	gr9-12	FI/agriculture H& W indicated on UCDSB website				
	Seaway -intermediate	517782	121	135	140	129	113	122	125	139	145	134	gr7-8	FI				
	Seaway DHS	918415 (375)	271	240	260	277	274	285	299	293	298	329	gr9-12	FI/agriculture, construction, transportation,health indicated on UCDSB				
	Tagwi intermediate	91610	230	210	195	196	181	168	138	159	163	154	gr7-8	FI				
	Tagwi	94664855 (664)	431	425	415	430	335	333	346	345	367	415	gr9-12	FI/agriculture,arts&culture,construction, health indicated on UCDSB				
	St. Lawrence intermediate!	540056	205	220	205	186	161	154	174	164	172	175	gr7-8	FI				
St.Lawrence SS	944670 (604)	380	385	390	377	395	357	322	366	394	322	gr9-12	Health & Wellness , hospitality & tourism					
T.R. Leger Adult & Altern	945072	n/a	945	910	948	1091	1222	1367	1353	1464	1740	gr9-12	Hospitality & Tourism					
Cornwall Collegiate intern	477957	204	200	200	177	160	184	186	251	259	236	gr7-8	FI					
Cornwall Collegiate	908210 (720)	503	550	530	542	566	605	641	622	636	738	gr9-12	FI/arts & culture, hospitality&tourism, health & wellness					
occupies space in other school sites																		

Chromebook 1:1 Un Chromebook pour tous nos nouveaux élèves

L'École secondaire catholique Le Relais (ESC Le Relais) est fière d'annoncer que chacun de ses nouveaux élèves inscrits en 7<sup>e</sup> ou 9<sup>e</sup> année pour l'année scolaire 2021-2022 recevra un ordinateur portable Chromebook.



Même avant la pandémie de la COVID-19, l'apprentissage en ligne était une composante importante de la réussite des élèves à l'école. Afin de s'assurer que tous les élèves peuvent développer les compétences du 21<sup>e</sup> siècle, le programme Chromebook 1:1 fera en sorte que tous les élèves auront leur propre ordinateur portable, et ce, dès leur entrée à l'ESC Le Relais jusqu'au moment de leur remise de diplôme.

« Nos élèves vivent au quotidien des moments pédagogiques qui ciblent le développement des compétences globales et l'intégration de la pédagogie numérique avec un personnel accueillant, dynamique, engagé, compétent et dévoué. Nous accompagnons nos élèves à devenir des citoyens numériques responsables avec de bonnes habiletés et habitudes de travail, qu'ils soient outillés, compétitifs et prêts à relever les défis qui les attendent sur le marché du travail ou dans un milieu d'études postsecondaires. Au Relais, j'embarque! », de partager Mme Lyne St-Denis, direction.

L'École secondaire catholique Le Relais d'Alexandria est une tradition d'excellence dans notre communauté depuis 1997. En plus d'être une ÉcoÉcole, elle offre à plus de 240 élèves, de la 7<sup>e</sup> à la 12<sup>e</sup> année, des programmes novateurs en sports, métiers/techno et arts/culture. L'école catholique est une tradition d'excellence pour la réussite des élèves, affichant le plus haut taux de diplomation de notre région depuis plusieurs années.

- 30 -

Pour plus de renseignements :  
Lyne St-Denis, direction  
613 525-3315

Date d'émission : le 6 mai 2021

## **Appendix 7 – Survey Results**

### **1. Adult Survey**

An adult survey was created to obtain input from parents, grandparents and residents of SDG on school related concerns. The online survey was live from June 14, 2021 to August 16, 2021 (63 days).

The full survey results can be viewed at <https://www.surveymonkey.com/results/SM-LRXG2ZNY9/>

#### **Summary:**

Total responses: 448

Estimated time to complete: 3 minutes 40 seconds

Estimated completion rate: 73%

Highest number of responses in one day: 286 (July 19, 2021)

- 35% of families have children across multiple grades with an even distribution of children in high school (17%), grades 1-3 (16%) grades 4-6 (13%) with the smallest enrollment in JK/SK (9%) and grades 7-8 (8%)
- 43% of parents feel somewhat informed of day-to-day learning activities in the classroom, 38% feel well informed and 18% do not feel well informed
- 52% of parents feel well informed of school-based activities and news, 34% feel somewhat well informed and 13% do not feel well informed
- 40% of parents do not feel well informed by the school board of decisions, events, reports related to schools and learning or Ministry of Education directives; 34% feel somewhat well informed and 25% feel well informed
- 70% of children and grandchildren in a family attend one school, 24 % attend two or more schools in the same school board and 8% of students attend two or more schools in different school boards
- 74% of children are bussed to school on yellow school bus transportation, 14% are driven and 10% walk or bike to school
- Bus ride times to school are evenly split at 56% for rides of 5-9 minutes, 10-20 minutes and 21-35 minutes in length each way; 20% of students ride the bus for 36-46 minutes and 13% ride the bus for 47-75 minutes each way
- 53% of adult respondents agreed that the Ministry of Education should ensure that students have access to technology learning devices and adequate internet and 28 % of adult respondents indicated that school boards should be responsible for providing these tools
- 54% of adult respondents stated that internet access is a barrier to learning for children, youth and adults in the community, while 26% of adult respondents indicated it was somewhat of a barrier

- 29% of parents want Special Education services as the most important program for students to access, followed by French Immersion (27%) and Ontario Youth Apprenticeship Programs (13%), High School Specialist Major programs (9%) and experiential learning opportunities (8%)
- 74% of adult respondents agreed that school buildings should serve more than one purpose in the community

#### Sample Barriers listed

- Lack of internet or poor internet,
- Threat of school closures or school amalgamations
- Water quality
- Provincial funding formula
- Too many school boards
- Childcare availability
- Teachers' unions
- Accessible transit
- School ventilation and air quality
- Lack of Early learning centres
- Folding public and Catholic school boards into one school system

#### Sample Obstacles listed

- Same programs, courses not available at all high schools
- Large classes, split classes
- New start times, busing schedules, adolescents starting earlier than young children
- Incorrect facts or data used for school closures
- Quality of education
- Mental health support to students
- Support to parents and consideration of families' needs
- Special education and expertise, access to assessments & professionals supporting disabilities
- Acknowledgment & consideration of community, educator and parental input
- Lack of support staff, quality of French Immersion teaching
- Diversity of staff and students
- Outdated texts and curriculum (Eurocentric) contributing to sexism and racism
- Lack of communication from teachers
- Unfair boundaries
- Virtual learning
- Access to after school activities, field trips, sporting events due to busing cost
- Transportation to coop placements
- Academic and applied courses in the same class
- Perception of rural students headed to vocational work after graduation
- Arts programming and sports opportunities

## Sample Additional Comments

- Teacher availability
- Thanks for this opportunity to participate
- Toronto based mentality and decision making
- Thank you for initiating this project. It often feels like education choices are decided from the top down. It is nice that you are thinking about what is important to citizens.
- Removing programming from schools and communities
- Thank you for considering the struggles of living and parenting in South Glengarry
- Thank you for doing this
- Freelance work, self-employment and small business start-up operations would be beneficial to students
- Will have a huge job restoring the faith in this community
- Offer parent workshops
- Trustees are out of touch with actual families that are going to schools
- Thank you for all you do for our students and schools. Your commitment to save Char-Lan and your continued work is appreciated . Thank you
- I LOVE that someone is actually asking these important questions and trying to make a difference! I wish you nothing but the best
- Lack of school board transparency and accountability
- We need efficiency that isn't cutting services to students
- Rural schools viewed as inferior
- Thank you for all your hard work
- Relatable curriculum to students' lives
- Merge the SDG library and the Cornwall public library, a split service in the region is a waste of money
- More outdoor learning opportunities for young children (field school, forest school)
- More parent surveys like this should happen . Thank you for your consideration
- Schools are not a business
- More accessibility for homeschooling families
- Education of children should never be political
- Collection of constituent data as is happening here is a good starting point

## 2. Student Survey

A student survey was created to obtain input from students aged 12 and over and recent graduates of SDG schools on school experiences. The online survey was live from April 26, 2021 to August 6, 2021 (100 days).

The full survey results can be viewed at

<https://www.surveymonkey.com/results/SM-ZQWBJ5NY9/>

### **Summary:**

Total responses: 46

Estimated time to complete: 6 minutes

Estimated completion rate: 66%

Highest number of responses in one day: 22 (July 19, 2021)

- 34% of students responding were 16-17 years old, 24% were 14-15 years old, 20% were 18 years or over and 21% were 12-13 years old
- 56% were female responders and 44% were male
- 80% of students responding indicated a preference for in-person learning, 15% for a hybrid model and 4 % indicating a preference for virtual learning
- Student priorities at school in order of importance were: academics, sports, socializing with friends, getting work experience and extra-curricular activities
- 63% of students get to school by yellow school bus, 13% by driving, 10% being driven, 10% walking or cycling, 2% by other (ATV, scooter, snowmobile, motorcycle)
- Student respondents chose the highest preference for going to school close to home as the best scenario and then choosing the shortest travel time to longest travel time
- Students most preferred attending a medium size high school (251-499 students) followed by a small sized high school (100-250 students) and lastly attending a large high school (500-1000 students); some students would like to attend one school for most courses but access another school for some courses and a few students stated that school size did not matter
- The preferred amenities around the school for students in order of priority were: recreation facilities, fast food takeout services, parks & green space, specialty facilities (workout, training or specialty gyms, aerobics, dance or yoga studios)
- Programs of importance to students in order of priority were: 26% French Immersion and High School specialist Majors, 21% experiential learning, 8% equally for Ontario Youth Apprenticeship Programs and Other (STEM courses, 3D modelling, coding, music & arts)

#### Additional Comments (not altered for grammar and spelling from original survey comments)

- The bus time change is too early
- Being at a small school is great in terms of student/teacher relations but severely limits courses options and timetable setup in comparison to large schools. We also miss out on trips such as Europe trip, the NYC trip that has now been removed and even camping
- Love my small school
- I like a smaller high school because you know everyone and its less crowded
- I like my small rural school better than a larger high school because I have more opportunities to be a part of school teams and or clubs; I know many of the students and staff; it isn't crowded or packed; there is not a lot of walking between classes and locker is closer to my friends' lockers
- I would really like to have access to in class courses like calculus
- I don't like the new times for school I liked it better before with more sleep
- Online was difficult. seems silly to have so many schools in area. Should just be a local school with all courses offered
- Difficult year online

- Bus ride too long; marker should be replaced with teachers since Marker rarely if ever respond to an issue and mark takes forever to return (if I'm taking math , I need to know if I'm doing it right or wrong before I do half the course with it)
- Bring back clubs and after school programs. technology and computers at an earlier age Robotics studies. After school arts programs
- French Immersion in a rural setting that I'm comfortable with
- UCDSB school are very far behind CDSBEO schools. I wish I had gone there because they have more classes and better sports teams.
- I went to Tagwi so something else other than tims everyday would be nice





Monika F &lt;monika.in.ottawa@gmail.com&gt;

## Request for facilities information by school / Demande de données sur les installations par école

9 messages

Monika F &lt;monika.in.ottawa@gmail.com&gt;

Wed, Jun 9, 2021 at 1:14 PM

To: jeremy.hobbs@ucdsb.on.ca, plant@cdsbeo.on.ca, bonnie.norton@cdsbeo.on.ca, Stéphane Vachon <stephane.vachon@cepeo.on.ca>, martin.lavigne@csdceo.org

Hello Mr. Hobbs & Ms. Norton,

In the context of a rural education strategy project study, kindly provide the following information for each school in your school board which is located in the United Counties of Stormont, Dundas, Glengarry:

- current facility condition of each school building
- current capacity of each school building
- current utilization rate of the school building
- details pertaining to any leased space in the school building (daycare/before & after school program/community program/adult education/other use of space)

Kindly provide this information by Friday June 18, 2021 to this email address.  
Your assistance is greatly appreciated.

-----  
Bonjour M. Vachon et M. Lavigne,

Dans le contexte d'un projet qui étudie la demande croissante pour l'éducation en langue française dans les régions rurales des comtés de Stormont Dundas Glengarry, veuillez fournir les données suivantes pour chaque école située dans cette région :

- l'indice de l'état des installations de l'école
- le taux de capacité de chaque école
- le taux d'utilisation de chaque école
- des détails sur les espaces loués qui sont présentement occupés dans l'école par une garderie/service de garde avant/après l'école, programme d'enseignement aux adultes, ou autre espace loué ou utilisé par la communauté)

Veuillez faire parvenir ces renseignements à ce courriel pour le vendredi 18 juin 2021.  
Merci pour votre précieuse collaboration

Monika Ferenczy, BA, BEd., MEd  
Education Consultant & Assessor  
Osgoode Hall Certified in Education Law  
Horizon Educational Consulting/ Conseillers en éducation  
www.horizoned.ca  
613-612-6842

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Hobbs, Jeremy &lt;jeremy.hobbs@ucdsb.on.ca&gt;

Wed, Jun 9, 2021 at 1:45 PM

To: Monika F <monika.in.ottawa@gmail.com>, "plant@cdsbeo.on.ca" <plant@cdsbeo.on.ca>, "bonnie.norton@cdsbeo.on.ca" <bonnie.norton@cdsbeo.on.ca>, Stéphane Vachon <stephane.vachon@cepeo.on.ca>, "martin.lavigne@csdceo.org" <martin.lavigne@csdceo.org>

Ms. Ferenczy,

As you can appreciate, it is an extraordinarily busy time of year for us in what is itself an extraordinary year. It would be highly unusual for us to go to the considerable effort to assemble this data without a greater understanding of how it will be used, or even – in light of this perfunctory form letter – a better sense of the legitimacy of the request.

If you'd like to discuss your request further, please contact my assistant by phone through the main switchboard of the Upper Canada District School Board and she will schedule 15 minutes over the next few weeks when I can gain a better understanding of your requirements, what you are trying to achieve and how we may benefit from your work.

Thank you

Jeremy Hobbs

Executive Superintendent of Business

[Quoted text hidden]

---

**Monika F** <monika.in.ottawa@gmail.com>

Mon, Jun 14, 2021 at 3:34 PM

To: "Hobbs, Jeremy" <jeremy.hobbs@ucdsb.on.ca>

Cc: "plant@cdsbeo.on.ca" <plant@cdsbeo.on.ca>, "bonnie.norton@cdsbeo.on.ca" <bonnie.norton@cdsbeo.on.ca>, Stéphane Vachon <stephane.vachon@cepeo.on.ca>, "martin.lavigne@csdceo.org" <martin.lavigne@csdceo.org>

Hello Mr. Hobbs,

Thank you for your prompt response to my query and I am copying all respondents as you have done as well, to provide further information and clarification.

The facilities information requested for schools in Stormont dundas & Glengarry is in the context of an SDG Council funded project to enhance rural education for students:

<https://www.standard-freeholder.com/news/local-news/future-advocacy-document-will-promote-rural-education-in-sdg>  
<https://www.cornwallseawaynews.com/2021/03/20/sdg-hires-education-consultant/>

My understanding from Ministry of Education officials is that facilities information is part of Open Source data and the Ministry has directed me to request this information directly from each school board. In addition, Tim Mills, a member of the education project working group, provided your name and indicated you would be very helpful in providing such information for the project.

I did reach out to your assistant to schedule a call however she stated that your first availability would be at the end of August and this information is required right now. Since this data is regularly collected, I am confident that it is available and accessible to one of your staff who could then forward it to me.

Thank you for your prompt attention to this request.

Best regards,

Monika Ferenczy, BA, BEd., MEd  
Education Consultant & Assessor  
Osgoode Hall Certified in Education Law  
Horizon Educational Consulting/ Conseillers en éducation  
[www.horizoned.ca](http://www.horizoned.ca)  
613-612-6842

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8/17/2021

Gmail - Request for facilities information by school / Demande de données sur les installations par école

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[Quoted text hidden]

---

**Hobbs, Jeremy** <jeremy.hobbs@ucdsb.on.ca>

Mon, Jun 14, 2021 at 3:42 PM

To: Monika F <monika.in.ottawa@gmail.com>

Cc: "plant@cdsbeo.on.ca" <plant@cdsbeo.on.ca>, "bonnie.norton@cdsbeo.on.ca" <bonnie.norton@cdsbeo.on.ca>, Stéphane Vachon <stephane.vachon@cepeo.on.ca>, "martin.lavigne@csdceo.org" <martin.lavigne@csdceo.org>

Hi Monika,

Thanks again for the email. Based upon your earlier description of your needs, it would seem that the information for our Board is currently available publicly through our website at the following address [http://www.ucdsb.on.ca/for\\_families/ucdsb\\_schools/school\\_information\\_profiles](http://www.ucdsb.on.ca/for_families/ucdsb_schools/school_information_profiles) along with a lot more data about our individual schools that may be of use.

If you require further information or in a different format, again, please feel free to work with Kristi Carter to find a date at which we can discuss your requirements so I can determine the resources that would be required to assemble it.

Thanks

Jeremy

[Quoted text hidden]

---

**Monika F** <monika.in.ottawa@gmail.com>

Tue, Jun 22, 2021 at 2:44 PM

To: "Hobbs, Jeremy" <jeremy.hobbs@ucdsb.on.ca>

Thank you Jeremy, much appreciated.

Monika Ferenczy, BA, BEd., MEd  
Education Consultant & Assessor  
Osgoode Hall Certified in Education Law &  
Human Rights for Education Professionals  
Horizon Educational Consulting/ Conseillers en éducation  
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[Quoted text hidden]

**Monika F** <monika.in.ottawa@gmail.com>

Tue, Jun 22, 2021 at 2:49 PM

Cc: "plant@cdsbeo.on.ca" <plant@cdsbeo.on.ca>, "bonnie.norton@cdsbeo.on.ca" <bonnie.norton@cdsbeo.on.ca>

Hello Ms. Norton,

Having participated in the presentation on the CPPG meeting last week which I found very helpful, could you kindly provide me with the link to the individual school profiles for the CDSBEO as Jeremy has above in his email for the UCDSB, so that I may obtain the data for some of the remaining schools not listed in the PPT presentation.

Many thanks,

Monika Ferenczy, BA, BEd., MEd  
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[Quoted text hidden]

**Monika F** <monika.in.ottawa@gmail.com>

Tue, Jun 22, 2021 at 2:54 PM

Cc: Stéphane Vachon <stephane.vachon@cepeo.on.ca>, "martin.lavigne@csdceo.org" <martin.lavigne@csdceo.org>

Bonjour M. Vachon et M. Lavigne,

Pourriez-vous me fournir le lien pour les renseignements individuels pour chaque école selon leur profil tel que M. Jeremy Hobbs a fourni pour le conseil UCDSB ci-haut.

**CEPEO -**

B66311 CEPEO	Rose des vents	383392
Alexandria	Terre des jeunes	383376
	<b>I'Heritage-secondaire</b>	907464
	<b>I'Heritage-intermediaire</b>	302864

**CSDCEO -**

B67326 CSDCEO	Elda Rouleau (Alexandria)	753297
	La Source (Moose Creek)	725668
	Marie-Tanguay	861367
	Notre Dame	737208
Crysler	Notre-dame-du-rosaire	707465
Long Sault	Sainte-Lucie	699373
North Lancaster	L'ange-Gardien	860443
	<b>La Citadelle</b>	725684
	<b>El catholique Citadelle</b>	723592
Alexandria	<b>Le Relais</b>	752908
	EC IntermediairePavAlex	718815

Merci pour votre précieuse collaboration.

Monika Ferenczy, BA, BEd., MEd  
Education Consultant & Assessor  
Osgoode Hall Certified in Education Law &  
Human Rights for Education Professionals  
Horizon Educational Consulting/ Conseillers en éducation  
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[Quoted text hidden]

---

**Stéphane Vachon** <stephane.vachon@cepeo.on.ca>

Wed, Jun 23, 2021 at 7:37 AM

To: Monika F <monika.in.ottawa@gmail.com>

Cc: "Hobbs, Jeremy" <jeremy.hobbs@ucdsb.on.ca>, plant@cdsbeo.on.ca, Bonnie Norton <bonnie.norton@cdsbeo.on.ca>, Martin Lavigne <martin.lavigne@csdceo.org>

Mme Ferenczy,

Le Conseil (CEPEO) accuse la réception de votre demande de précision en lien avec ses installations scolaires et le « projet qui étudie la demande croissante pour l'éducation en langue française dans les régions rurales des comtés (sic) de Stormont Dundas Glengarry ». Le Conseil n'est pas au courant de cette étude, de l'identité de l'entité qui la pilote ou de l'objectif visé par celle-ci.

Ayant pris connaissance de votre demande et compte tenu de l'absence de précisions, de la nature générale et de l'envergure de votre demande, le contexte et des exigences de la situation actuelle, le Conseil n'est pas en mesure d'y donner suite faute de ressources. Malgré cette pénurie de ressources, il ne semble avoir aucun motif juridique à l'appui de votre demande.

Nous vous suggérons d'adresser votre demande au ministère de l'Éducation ou de faire une demande dans le cadre de la loi sur l'accès à l'information.

[Quoted text hidden]

--

**Stéphane Vachon**  
Surintendant des affaires  
T (613) 742-8960 poste 3803  
Télec (613) 742-1012

**CEPEO créateur d'opportunités**



Le CEPEO vous invite à penser à l'environnement en considérant l'impact écologique relié à l'impression du présent courriel. Merci.

Le présent courriel contient des renseignements destinés uniquement à l'entité nommée dans le message.

8/17/2021

Gmail - Request for facilities information by school / Demande de données sur les installations par école

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613-742-8960 | 1 888 33 CEPEO | <https://cepeo.on.ca>

---

**Bonnie Norton** <Bonnie.Norton@cdsbeo.on.ca>

Wed, Jun 23, 2021 at 7:59 AM

To: Monika F <monika.in.ottawa@gmail.com>

Cc: "jeremy.hobbs" <jeremy.hobbs@ucdsb.on.ca>, "Stephane Vachon (stephane.vachon@cepeo.on.ca)" <stephane.vachon@cepeo.on.ca>, "martin.lavigne@csdceo.org" <martin.lavigne@csdceo.org>

Good morning Ms. Ferenczy,

We acknowledge receipt of your request. The Catholic District School Board of Eastern Ontario is not aware of the "rural education strategy project study" cited in your request. Your correspondence is devoid of any particulars regarding the project.

Consequently, after due consideration of the general nature, content, breadth, and all exigencies of the request, the Catholic District School Board of Eastern Ontario must decline. First, it only has the resources to meet its current operational needs. Second, even if it did benefit from such supplementary resources, there is no apparent legal obligation to collect or provide the data that you are seeking. We do not have the software that UCDSB is using.

We recommend that you communicate with the Ontario Ministry of Education.

Take care,

**Bonnie Norton, CPA, CGA**

Associate Director of Education & Treasurer

Catholic District School Board of Eastern Ontario

Box 2222, 2755 Highway 43

Kemptville, ON K0G 1J0

(613)714-6425 (Direct)

(613)714-6380 (Admin Assistant, Stephanie Keyes)



*"Be Holy, Joy Springs from a Loving Heart"*

---

**From:** Monika F <monika.in.ottawa@gmail.com>

**Sent:** Tuesday, June 22, 2021 2:49 PM

**Cc:** Plant Operations <plant@cdsbeo.on.ca>; Bonnie Norton <Bonnie.Norton@cdsbeo.on.ca>

**Subject:** [EXTERNAL] Re: Request for facilities information by school / Demande de données sur les installations par école

Caution

This email originated from outside the organization. Do not click on links or open attachments unless you recognize the sender and have verified their email address and know the content is safe.

Hello Ms. Norton,

Having participated in the presentation on the CPPG meeting last week which I found very helpful, could you kindly provide me with the link to the individual school profiles for the CDSBEO as Jeremy has above in his email for the UCDSB , so that I may obtain the data for some of the remaining schools not listed in the PPT presentation.

Many thanks,

Monika Ferenczy, BA, BEd., MEd

Education Consultant & Assessor

Osgoode Hall Certified in Education Law &

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On Mon, Jun 14, 2021 at 3:42 PM Hobbs, Jeremy <jeremy.hobbs@ucdsb.on.ca> wrote:

Hi Monika,

Thanks again for the email. Based upon your earlier description of your needs, it would seem that the information for our Board is currently available publicly through our website at the following address [http://www.ucdsb.on.ca/families/ucdsb\\_schools/school\\_information\\_profiles](http://www.ucdsb.on.ca/families/ucdsb_schools/school_information_profiles) along with a lot more data about our individual schools that may be of use.

If you require further information or in a different format, again, please feel free to work with Kristi Carter to find a date at which we can discuss your requirements so I can determine the resources that would be required to assemble it.

Thanks

Jeremy

---

**From:** Monika F <monika.in.ottawa@gmail.com>

**Sent:** June 14, 2021 3:35 PM

**To:** Hobbs, Jeremy <jeremy.hobbs@ucdsb.on.ca>

**Cc:** plant@cdsbeo.on.ca; bonnie.norton@cdsbeo.on.ca; Stéphane Vachon <stephane.vachon@cepeo.on.ca>; martin.lavigne@csdceo.org

**Subject:** Re: Request for facilities information by school / Demande de données sur les installations par école

Hello Mr. Hobbs,

Thank you for your prompt response to my query and I am copying all respondents as you have done as well, to provide further information and clarification.

The facilities information requested for schools in Stormont dundas & Glengarry is in the context of an SDG Council funded project to enhance rural education for students:

<https://www.standard-freeholder.com/news/local-news/future-advocacy-document-will-promote-rural-education-in-sdg>

<https://www.cornwallseawaynews.com/2021/03/20/sdg-hires-education-consultant/>

My understanding from Ministry of Education officials is that facilities information is part of Open Source data and the Ministry has directed me to request this information directly from each school board. In addition, Tim Mills, a member of the education project working group, provided your name and indicated you would be very helpful in providing such information for the project.



I did reach out to your assistant to schedule a call however she stated that your first availability would be at the end of August and this information is required right now. Since this data is regularly collected, I am confident that it is available and accessible to one of your staff who could then forward it to me.

Thank you for your prompt attention to this request.

Best regards,

Monika Ferenczy, BA, BEd., MEd

Education Consultant & Assessor

Osgoode Hall Certified in Education Law

Horizon Educational Consulting/ Conseillers en éducation

[www.horizoned.ca](http://www.horizoned.ca)

613-612-6842

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On Wed, Jun 9, 2021 at 1:45 PM Hobbs, Jeremy <[jeremy.hobbs@ucdsb.on.ca](mailto:jeremy.hobbs@ucdsb.on.ca)> wrote:

Ms. Ferenczy,

As you can appreciate, it is an extraordinarily busy time of year for us in what is itself an extraordinary year. It would be highly unusual for us to go to the considerable effort to assemble this data without a greater understanding of how it will be used, or even – in light of this perfunctory form letter – a better sense of the legitimacy of the request.

If you'd like to discuss your request further, please contact my assistant by phone through the main switchboard of the Upper Canada District School Board and she will schedule 15 minutes over the next few weeks when I can gain a better understanding of your requirements, what you are trying to achieve and how we may benefit from your work.

Thank you

Jeremy Hobbs

Executive Superintendent of Business

---

**From:** Monika F <monika.in.ottawa@gmail.com>

**Sent:** June 9, 2021 1:15 PM

**To:** Hobbs, Jeremy <jeremy.hobbs@ucdsb.on.ca>; plant@cdsbeo.on.ca; bonnie.norton@cdsbeo.on.ca; Stéphane Vachon <stephane.vachon@cepeo.on.ca>; martin.lavigne@csdceo.org

**Subject:** Request for facilities information by school / Demande de données sur les installations par école

Hello Mr. Hobbs & Ms. Norton,

[Quoted text hidden]

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Monika F &lt;monika.in.ottawa@gmail.com&gt;

## Demande de renseignements

2 messages

Monika F &lt;monika.in.ottawa@gmail.com&gt;

Tue, Jul 20, 2021 at 12:34 PM

To: francois.turpin@csdceo.on.ca, courriel@csdceo.org

Bonjour Monsieur Turpin,

Cette demande a été envoyée à Martin Lavigne à plusieurs reprises sans avoir eu de réponse et je vous achemine cette demande pour recevoir les informations sans délai.

Dans le contexte d'un projet qui étudie la demande croissante pour l'éducation en langue française dans les régions rurales des comtés de Stormont, Dundas et Glengarry,

(référence:

<https://www.standard-freeholder.com/news/local-news/future-advocacy-document-will-promote-rural-education-in-sdg>
<https://www.cornwallseawaynews.com/2021/03/20/sdg-hires-education-consultant/> )

pourriez-vous me fournir les informations suivantes pour les écoles identifiées ci-bas :

- l'indice de l'état des installations de l'école
- le taux de capacité de chaque école
- le taux d'utilisation de chaque école
- des détails sur les espaces loués qui sont présentement occupés dans l'école par une garderie/service de garde avant/après l'école, programme d'enseignement aux adultes, ou autre espace loué ou utilisé par la communauté)

B67326 CSDCEO	Elda Rouleau (Alexandria)	753297
	La Source (Moose Creek)	725668
	Marie-Tanguay	861367
	Notre Dame	737208
Crysler	Notre-dame-du-rosaire	707465
Long Sault	Sainte-Lucie	699373
North Lancaster	L'ange-Guardien	860443
	<b>La Citadelle</b>	725684
	<b>El catholique Citadelle</b>	723592
Alexandria	<b>Le Relais</b>	752908
	EC IntermediairePavAlex	718815

Je vous remercie pour votre précieuse collaboration .

Veuillez agréer, Monsieur, mes salutations distinguées.

Monika Ferenczy, BA, BEd., MEd  
 Education Consultant & Assessor  
 Osgoode Hall Certified in Education Law &  
 Human Rights for Education Professionals  
 Horizon Educational Consulting/ Conseillers en éducation  
[www.horizoned.ca](http://www.horizoned.ca)  
 613-612-6842

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---

**François Turpin** <francois.turpin@csdceo.org>

Sat, Jul 24, 2021 at 9:55 AM

To: monika.in.ottawa@gmail.com

Cc: Eugénie Congi <eugenie.congi@csdceo.org>, Marie Claude Dicaire <marie.claude.dicaire@csdceo.org>, Martin Lavigne <lavima@csdceo.org>

Bonjour madame Ferenczy,

Merci de l'information, mais je n'ai aucune idée de cette requête. Vous pouvez suivre le processus de demande d'accès à l'information en bonne et due forme comme la loi le prévoit. Je ne sais pas quelle organisation vous représentez et certaines données ne peuvent pas être partagées aussi facilement que vous les croyez. Finalement, nous n'avons aucune idée à quoi servira votre étude et nous n'avons jamais été consultés bien que cette recherche vienne nous affecter directement.

Merci également de votre compréhension

François Turpin  
Directeur de l'éducation  
CSDCEO  
875, chemin de comté 17  
L'Orignal (Ontario) K0B 1K0  
téléphone: (613) 675-4691

---

De : **Monika F** <monika.in.ottawa@gmail.com>

Date: mar. 20 juil. 2021 à 12:34

Subject: Demande de renseignements

To: <francois.turpin@csdceo.on.ca>, <courriel@csdceo.org>

[Quoted text hidden]

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## **Appendix 7 – Survey Results**

### **1. Adult Survey**

An adult survey was created to obtain input from parents, grandparents and residents of SDG on school related concerns. The online survey was live from June 14, 2021 to August 16, 2021 (63 days).

The full survey results can be viewed at <https://www.surveymonkey.com/results/SM-LRXG2ZNY9/>

#### **Summary:**

Total responses: 448

Estimated time to complete: 3 minutes 40 seconds

Estimated completion rate: 73%

Highest number of responses in one day: 286 (July 19, 2021)

- 35% of families have children across multiple grades with an even distribution of children in high school (17%), grades 1-3 (16%) grades 4-6 (13%) with the smallest enrollment in JK/SK (9%) and grades 7-8 (8%)
- 43% of parents feel somewhat informed of day-to-day learning activities in the classroom, 38% feel well informed and 18% do not feel well informed
- 52% of parents feel well informed of school-based activities and news, 34% feel somewhat well informed and 13% do not feel well informed
- 40% of parents do not feel well informed by the school board of decisions, events, reports related to schools and learning or Ministry of Education directives; 34% feel somewhat well informed and 25% feel well informed
- 70% of children and grandchildren in a family attend one school, 24 % attend two or more schools in the same school board and 8% of students attend two or more schools in different school boards
- 74% of children are bussed to school on yellow school bus transportation, 14% are driven and 10% walk or bike to school
- Bus ride times to school are evenly split at 56% for rides of 5-9 minutes, 10-20 minutes and 21-35 minutes in length each way; 20% of students ride the bus for 36-46 minutes and 13% ride the bus for 47-75 minutes each way
- 53% of adult respondents agreed that the Ministry of Education should ensure that students have access to technology learning devices and adequate internet and 28 % of adult respondents indicated that school boards should be responsible for providing these tools
- 54% of adult respondents stated that internet access is a barrier to learning for children, youth and adults in the community, while 26% of adult respondents indicated it was somewhat of a barrier

- 29% of parents want Special Education services as the most important program for students to access, followed by French Immersion (27%) and Ontario Youth Apprenticeship Programs (13%), High School Specialist Major programs (9%) and experiential learning opportunities (8%)
- 74% of adult respondents agreed that school buildings should serve more than one purpose in the community

#### Sample Barriers listed

- Lack of internet or poor internet,
- Threat of school closures or school amalgamations
- Water quality
- Provincial funding formula
- Too many school boards
- Childcare availability
- Teachers' unions
- Accessible transit
- School ventilation and air quality
- Lack of Early learning centres
- Folding public and Catholic school boards into one school system

#### Sample Obstacles listed

- Same programs, courses not available at all high schools
- Large classes, split classes
- New start times, busing schedules, adolescents starting earlier than young children
- Incorrect facts or data used for school closures
- Quality of education
- Mental health support to students
- Support to parents and consideration of families' needs
- Special education and expertise, access to assessments & professionals supporting disabilities
- Acknowledgment & consideration of community, educator and parental input
- Lack of support staff, quality of French Immersion teaching
- Diversity of staff and students
- Outdated texts and curriculum (Eurocentric) contributing to sexism and racism
- Lack of communication from teachers
- Unfair boundaries
- Virtual learning
- Access to after school activities, field trips, sporting events due to busing cost
- Transportation to coop placements
- Academic and applied courses in the same class
- Perception of rural students headed to vocational work after graduation
- Arts programming and sports opportunities

## Sample Additional Comments

- Teacher availability
- Thanks for this opportunity to participate
- Toronto based mentality and decision making
- Thank you for initiating this project. It often feels like education choices are decided from the top down. It is nice that you are thinking about what is important to citizens.
- Removing programming from schools and communities
- Thank you for considering the struggles of living and parenting in South Glengarry
- Thank you for doing this
- Freelance work, self-employment and small business start-up operations would be beneficial to students
- Will have a huge job restoring the faith in this community
- Offer parent workshops
- Trustees are out of touch with actual families that are going to schools
- Thank you for all you do for our students and schools. Your commitment to save Char-Lan and your continued work is appreciated . Thank you
- I LOVE that someone is actually asking these important questions and trying to make a difference! I wish you nothing but the best
- Lack of school board transparency and accountability
- We need efficiency that isn't cutting services to students
- Rural schools viewed as inferior
- Thank you for all your hard work
- Relatable curriculum to students' lives
- Merge the SDG library and the Cornwall public library, a split service in the region is a waste of money
- More outdoor learning opportunities for young children (field school, forest school)
- More parent surveys like this should happen . Thank you for your consideration
- Schools are not a business
- More accessibility for homeschooling families
- Education of children should never be political
- Collection of constituent data as is happening here is a good starting point

## 2. Student Survey

A student survey was created to obtain input from students aged 12 and over and recent graduates of SDG schools on school experiences. The online survey was live from April 26, 2021 to August 6, 2021 (100 days).

The full survey results can be viewed at

<https://www.surveymonkey.com/results/SM-ZQWBJ5NY9/>

### **Summary:**

Total responses: 46

Estimated time to complete: 6 minutes

Estimated completion rate: 66%

Highest number of responses in one day: 22 (July 19, 2021)

- 34% of students responding were 16-17 years old, 24% were 14-15 years old, 20% were 18 years or over and 21% were 12-13 years old
- 56% were female responders and 44% were male
- 80% of students responding indicated a preference for in-person learning, 15% for a hybrid model and 4 % indicating a preference for virtual learning
- Student priorities at school in order of importance were: academics, sports, socializing with friends, getting work experience and extra-curricular activities
- 63% of students get to school by yellow school bus, 13% by driving, 10% being driven, 10% walking or cycling, 2% by other (ATV, scooter, snowmobile, motorcycle)
- Student respondents chose the highest preference for going to school close to home as the best scenario and then choosing the shortest travel time to longest travel time
- Students most preferred attending a medium size high school (251-499 students) followed by a small sized high school (100-250 students) and lastly attending a large high school (500-1000 students); some students would like to attend one school for most courses but access another school for some courses and a few students stated that school size did not matter
- The preferred amenities around the school for students in order of priority were: recreation facilities, fast food takeout services, parks & green space, specialty facilities (workout, training or specialty gyms, aerobics, dance or yoga studios)
- Programs of importance to students in order of priority were: 26% French Immersion and High School specialist Majors, 21% experiential learning, 8% equally for Ontario Youth Apprenticeship Programs and Other (STEM courses, 3D modelling, coding, music & arts)

#### Additional Comments (not altered for grammar and spelling from original survey comments)

- The bus time change is too early
- Being at a small school is great in terms of student/teacher relations but severely limits courses options and timetable setup in comparison to large schools. We also miss out on trips such as Europe trip, the NYC trip that has now been removed and even camping
- Love my small school
- I like a smaller high school because you know everyone and its less crowded
- I like my small rural school better than a larger high school because I have more opportunities to be a part of school teams and or clubs; I know many of the students and staff; it isn't crowded or packed; there is not a lot of walking between classes and locker is closer to my friends' lockers
- I would really like to have access to in class courses like calculus
- I don't like the new times for school I liked it better before with more sleep
- Online was difficult. seems silly to have so many schools in area. Should just be a local school with all courses offered
- Difficult year online



- Bus ride too long; marker should be replaced with teachers since Marker rarely if ever respond to an issue and mark takes forever to return (if I'm taking math , I need to know if I'm doing it right or wrong before I do half the course with it)
- Bring back clubs and after school programs. technology and computers at an earlier age Robotics studies. After school arts programs
- French Immersion in a rural setting that I'm comfortable with
- UCDSB school are very far behind CDSBEO schools. I wish I had gone there because they have more classes and better sports teams.
- I went to Tagwi so something else other than tims everyday would be nice

## **Appendix 8 – Specialist High School Majors (SMHS) - Courses focused towards a career**

Program explanation <http://www.edu.gov.on.ca/morestudentsuccess/SHSM.html>

- A3. Sectors: *(Click on each heading for the explanation of courses offered under the sector)*
  - [Agriculture](#)
  - [Arts and Culture](#)
  - [Aviation and Aerospace](#)
  - [Business](#)
  - [Construction](#)
  - [Energy](#)
  - [Environment](#)
  - [Food Processing](#)
  - [Forestry](#)
  - [Health and Wellness](#)
  - [Horticulture and Landscaping](#)
  - [Hospitality and Tourism](#)
  - [Information and Communications Technology](#)
  - [Justice, Community Safety, and Emergency Services](#)
  - [Manufacturing](#)
  - [Mining](#)
  - [Non-profit](#)
  - [Sports](#)
  - [Transportation](#)

### **Local considerations**

1. Students, parents and local business should decide which programs should be offered at which school in conjunction with opportunities in the local area for volunteer hours, co-op placements for students and student part-time employment.
2. Communities, service clubs and local councils could facilitate opportunities for students wanting to access in person a SMHS program to board with a local family Monday to Friday if they don't want remote virtual course access and travel distance is too great.
3. Student exchanges between geographically distant school boards for SMHS programs should be facilitated so that students can experience rural schools and rural life for one or two semesters to participate in an SMHS program that is not available in their area or vice versa (for example : Toronto students access agriculture in SDG and SDG students experience aviation and aerospace in Toronto).



March 12, 2018

Attention:

Joan Green and Michel Paulin, Co-leads  
ST.newvision@ontario.ca

From:

Canadian Parents for French Ontario  
2055 Dundas St. East. Suite 103  
Mississauga, Ontario. L4X 1M2  
Tel: 905-366-1012  
Betty Gormley, Executive Director,  
[bgormley@on.cpf.ca](mailto:bgormley@on.cpf.ca)

**Re: A New Vision for Student Transportation in Ontario**

Thank you for this opportunity to help create a new vision for transportation for Ontario students that is safe, responsive, equitable, and accountable.

Contents:

Recommendation of Canadian Parents for French Ontario – page 2  
About French Immersion/Extended French Programs in Ontario – page 2  
Ontario's Goals: Framework for French as a Second Language (FSL) Programs in Ontario Schools (2013)  
Ontario's Commitment: Federal-Provincial Official Languages in Education Program (2013-2018)  
About Canadian Parents for French – page 3

Responsiveness-service levels – page 4  
Equity – accessibility – page 7  
Safety and well-being-safe and respectful transportation environment – page 9  
Accountability – quality assurance – page 12

Comparison Charts of English, French Immersion, Extended French Service Levels – page 14

**Recommendation:**

In support of equity, inclusion and student achievement in French as a Second Language programs, Canadian Parents for French Ontario recommends that the Ministry of Education:

Develop and enforce a province wide transportation policy that is inclusive of students in French Immersion/Extended programs and gives clear guidelines:

- On walking distances, pick up locations, time limit and distance that any student may be expected to ride a bus or commute on public transit
- On integration of before/after school care and shared custody with transportation services based on need identified by parents
- To ensure that transportation is available at NO COST to students or their parents/guardians

A lack of a vehicle, adult to drive and/or financial means should not be a barrier to participation in French immersion/extended programs which are publicly funded education programs. All students with 2 home addresses and a before/after school address should be accommodated with transportation including students in French immersion/extended programs.

**About French Immersion/Extended Programs in Ontario:**

French Immersion/Extended programs are Official Language Programs supported through the Official Languages Act, The Official Languages in Education Agreements between the Governments of Canada and Ontario and the Ministry of Education Technical Paper, Framework for French as a Second Language in Ontario Schools and Curriculum.

French immersion/extended enrolment: **245 818** (13% of English Board enrolment) \*

Number of Boards offering French immersion/extended: **54** (with 98% of English Board enrolment) \*

Number of immersion students being transported: **124 052** (15% of total transported) +

\* 2015-16 ONSYS data, most recent release from EDU

+2015-16 Ministry of Education Student Transportation Survey unaudited data. NB: data does not specify extended and often, Boards may report extended and immersion together.



**Extended French Programs:** French is the language of instruction for 25-49% of the school day. Extended French programs generally start in Grade 4, 5 or 7. For Grades 9-12, extended students do at least 7 out of 30 credits in French. Boards decide locations, program configuration and starting grade. Curriculum begins in Grade 4.

**French Immersion Programs:** French is the language of instruction 50-100% of the school day. Most French immersion programs start in JK, SK or Grade 1. For Grades 9-12, immersion students do at least 10 out of 30 credits in French. Boards decide locations, program configuration and starting grade. Curriculum begins in Grade 1, as it does for the regular English program. Early full French immersion starting in kindergarten is considered the optimal approach to developing French proficiency and educators follow the Ministry Kindergarten Program 2016, “play-based learning in a culture of inquiry”

#### **Ontario’s Goals: Framework for French as a Second Language (FSL) Programs in Ontario Schools (2013)**

1. Increase student confidence, proficiency, and achievement in FSL.
2. Increase the percentage of students studying FSL until graduation.
3. Increase student, educator, parent, and community engagement in FSL.

#### **Ontario’s Commitment: Federal-Provincial Official Languages in Education Program (2013-2018)**

Provide every student with the opportunity to study FSL and to track and improve:

- student performance-acquisition of measurable second-language skills
- provision of programs
- student participation-recruitment and retention to secondary graduation
- enriched school environment
- support of educational staff and research

**About Canadian Parents for French:** Canadian Parents for French (CPF) was founded in 1977 with the assistance of Canada’s first Official Languages Commissioner. More than 25 000 volunteer parent and stakeholder members across Canada promote and support opportunities for young people to learn French. CPF is the very proud recipient of the Commissioner of Official Languages 2016 Award of Excellence in recognition of outstanding contribution to linguistic duality in Canada.

CPF Ontario serves on the Minister of Education’s Provincial French as a Second Language Working Group and has consulted with the Ministry on the development of all of the current FSL policy and curriculum documents.

CPF Ontario has created and implemented many projects supported by Canadian Heritage and the Ministry of Education, including “O Canada” school performances, Pathways to Bilingual Success Conferences for students, parent webinars in support of parents and their children in FSL programs and our web data base [www.frenchstreet.ca](http://www.frenchstreet.ca) and our annual French public speaking contest, Concours d’Art Oratoire. Information for parents, data and research on FSL education are shared via our public websites [cpf.ca](http://cpf.ca), [on.cpf.ca](http://on.cpf.ca), facebook and twitter.

## **Responsiveness-service levels**

### **1. *Do you think that Ontario students are well-served in the current system?***

Some students are well-served but others are not. Some French immersion/extended students receive transportation support using the same parameters as those used for students attending English programs and some French immersion/extended students receive no support at all.

Ontario School Board transportation policies vary considerably for distances that define provision of transportation (yellow bus or transit tickets), for transfers allowed on transit, for walking distances to bus pick-up points and for time allowed on a bus.

Many parents of students in JK-5/6 who want to access before/after school programs have to forgo yellow bus transportation and transport their own children.

### **2. *Which aspects of service are working well to help support students in achieving excellence?***

If transportation is provided on the same basis for French immersion/extended students, as English program students, students are served as well (or as badly) as the general student population. This occurs when a yellow bus is provided for JK-5/6 students whether that school is an English one or a French immersion/extended one and similarly, for grades 7-12 whether it is yellow bus or transit.

### **3. *What's not working?***

Students cannot achieve excellence in French immersion/extended programs if they can't get there.

Policies vary across Ontario and even within consortia (see charts page 14-18):

Waterloo Region DSB and Waterloo Catholic DSB do not provide transportation to immersion.

Toronto Catholic DSB does not provide transportation to immersion unless funds are available. They have been in a deficit in their transportation budget since 2000. Their co-terminus board, Toronto DSB provides transportation to all SK-12 students based on the same distance parameters as the English program.

Peel DSB provides yellow bus to Grade 1-8 immersion students, but no transportation for secondary immersion students unless they are in Caledon. Secondary students in English get transportation. Dufferin-Peel Catholic DSB does not provide transportation for immersion.



Upper Grand DSB provides transportation to immersion based on the same parameters as the English program and took care, over 40 years ago, when starting immersion in the rural areas to choose locations which had nearby secondary schools. This meant elementary immersion students could get on an existing bus run as enrolment grew.

Lakehead DSB and Thunder Bay Catholic DSB provide transportation based on the same parameters as the English program.

Students need to arrive at school ready to learn. A young child who falls asleep on the bus or has a toilet accident is not ready to learn. Long bus rides are very hard on students, particularly younger students and their classmates.

Students need access to extra-curricular activities to support their learning in French and other subjects, social and physical development. Long commutes, whether on a yellow bus or on transit, limit opportunities for all students. Early and late bus runs are done in some boards but not across the province.

School bus routes can change from year to year and this becomes difficult to manage, especially where parents who share custody are on two different routes.

Parents can face insurmountable barriers in accessing both transportation and before/after school care.

In the Toronto DSB, French immersion/extended bus pick up points are usually at the English home school that is within walking distance of the child's home. Parents may only access before/after school care at the school their child attends; i.e., the French immersion/extended school. Bus runs are set to arrive when school starts which means if you need to be at work earlier or stay later, you have to transport your child to and from the French immersion/extended school for before/after school care, assuming a spot is available.

Even if your bus pick up is at your English home school, you cannot access before/after school programs there. A few pre-amalgamation bus runs do go to non-TDSB daycare sites but it is rare while other boards do have daycare pick-ups; such as WCDSB, TBCDSB. Daycares must maintain the staff-child ratio at all times and meeting a bus is a challenge to organize. There is significant resistance to changing procedures to meet the needs of French immersion/extended students on the bus whether it is by adjusting bus schedules to ease parent burden and making access rules for daycare align with both bussing and immersion.

The logistics of the yellow bus service can negatively impact parent's, mostly women's, ability to seek and hold paid jobs, particularly in rural areas. Different pick-up/drop off locations and times for elementary and secondary and the total time parents are going back and forth and waiting for 2 buses can easily consume 1- 2 hours of a work day.

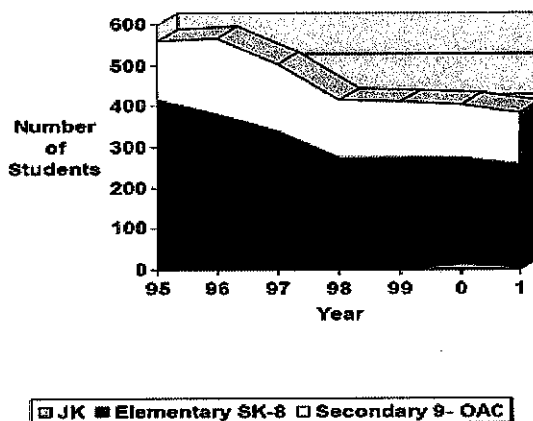
Reducing transportation service reduces enrolment in French immersion/extended and destabilizes strong programs. When Trillium Lakelands DSB examined their French immersion transportation in 2001, they found that a 1995 move to "Express Bussing" (which was not express at all and meant bus stops that were even further from students' homes) resulted in a marked drop in enrolment.



## CANADIAN PARENTS FOR FRENCH ONTARIO

Transportation was the only factor that had changed. When, the board made a correction to improve service and access to French immersion, enrolment did increase in elementary. However, secondary enrolment continued to decline for a number of years and recovery to a robust secondary program took years.

**FI Enrolment Since Express Bussing  
Implemented Sept '96**



*Bus Them and They Will Come*, Canadian Parents for French (Ontario) Trillium Lakelands Chapter  
Presentation to TLDSB French Immersion Review Committee 2001/02

Page 10, Kawartha Lakes This Week, Friday, May 31, 2002

www.kawarthalakes.thisweek.com

## New routes expected to boost enrolment

ANNE WORTH  
THIS WEEK

In a move to get students moving into French immersion, the public school board has approved a plan to share bus services with its Catholic counterpart.

The Trillium Lakelands District School Board authorized the sharing of transportation services for 245 of its students and 1,128 students from the Peterborough Victoria Northumberland and Clarington Catholic

### District School Board.

According to a report from the superintendent who oversees transportation, the plan could save the public board \$45,000 in transportation costs.

"When we approached them (the Catholic board) they were very receptive and eager to come up with a sharing arrangement that was mutually beneficial to both of us," says Jim Bradley.

The plan is a result of a review conducted in March of this year, surveying all aspects of the current French immersion program.

In the course of the review it was revealed the program was suffering from lack of good transportation.

"The transportation routes as they existed were hindering the growth of the program," says Jim Bradley.

At the elementary level French immersion is offered to students from across the City of Kawartha Lakes at Lindsay's Leslie Frost

### Public School.

Currently there is a system of so-called express bus routes.

These pick up children on major routes, but some families had to drive students just to reach the express bus stop. These distances, according to the board's report on transportation "far exceeds" the board's walking distances.

The number of students enrolled in French immersion has dropped since the introduction of the express bus system. In 1995 there were 337 students in French immersion in kindergarten, through Grade 6 and this year there are 193.

BJ Mailoux-Brown is the principal at Leslie Frost school.

Ms Mailoux-Brown was on the original review committee that looked into the French immersion program and she is happy about the prospect of better busing.

"It's certainly very exciting that this is tak-

ing place," she says.

"Our children must have the same accessibility as the other students."

She noted that on June 6 at 7 p.m., the school is hosting a meeting for parents to learn about the busing changes.

Ms Mailoux-Brown wants to get the word out to prospective students and their families in the hopes of boosting enrolment for the fall.

"The transportation piece has been a barrier for some parents," she says.

The plan is only now feasible because of the new Catholic high school in Lindsay, St. Thomas Aquinas and the larger volume of students it brings to Lindsay.

Students will be brought into Lindsay at St. Thomas, then will take a transfer bus to Leslie Frost school.

The cost of the service will also cover the wages of educational assistants used to supervise this transfer.



## **Equity – accessibility**

### **1. *Do you think that all Ontario students are receiving the transportation services that they need?***

No. French immersion/extended students are not receiving the transportation services they need in every board across the province.

### **2. *Does the student transportation system adequately take into account the diverse needs of different types of students?***

No. Transportation policies that exclude French immersion/extended students as a group mean that only children who live within walking distance or have parents with a car and a flexible work schedule can attend. This disadvantages children with single parents, with parents who work shift work and with parents who do not have the financial resources to own a reliable, available vehicle. French immersion programs began where demand was concentrated, often many years ago in established neighborhoods or urban centres. Newcomer and rural areas have fewer programs and without transportation, face an enormous barrier to participation.

When transportation is eliminated or reduced it has a direct impact on student achievement in French, enrolment, retention and in turn the course selection, retention, graduation rates and in turn the viability and sustainability of French immersion/extended programs.

### **3. *Do you have any specific examples of situations that show that there is an equity issue that needs to be addressed?***

#### ***Gaps***

Boards that have French immersion/extended transportation on the same basis as English programs include TDSB, UGDSB, LDSB, TBCDSB, OCDSB, OCSB. Boards that do not have French immersion/extended transportation on the same basis as English include PDSB, DPCDB, WRDSB, WCDSB. (see charts p. 14-18). The gaps in the provision of transportation for French immersion/extended create a province-wide equity issue and undermine the achievement of Ontario, Canada and student/parent goals in French as a Second Language.

#### ***Financial Cost***

School boards that require that students pay for transit, whether it is public transit or private, in order to be able to access French immersion/extended, a publicly funded Official Language education program, place a financial barrier in front of them and their parents. For example, the Peel DSB secondary French immersion/extended students are not eligible for transportation. Those beyond the distance parameter



for walking are expected to pay out of pocket for transit in all areas of the Board while a yellow bus is provided for all students in the English program and immersion students in Caledon.

***Before/ after School Care***

*My child asked to be in French immersion when she was in JK. She loved it in SK and I was able to access the before/after school care at the immersion school. But, in grade 1, there was no room in the before/after school care. I looked for another spot in our area and the only one I could find was at our local English school. The school bus did not pick up there and they would not budge. I am on my own and I had to be able to commute downtown to work. In the end, I had to move my daughter out of immersion and back to the English school to access the daycare so I could work.*

*– Etobicoke mom as told to CPF Ontario*

**Safety and well-being-safe and respectful transportation environment**

- 1. Do you believe that Ontario is doing enough to support the safety and well-being of students, staff and drivers?**

No.

- 2. What improvements could be made to safety and well-being for students as they are being transported to and from school?**

Make the safety and well-being of students and their families the focal point of transportation policies regardless of English/French program by:

- limiting time on the bus and/or public transit,
- reduce walking distances,
- establishing and monitoring safety standards for pick-up points,
- provide and reinstate driveway pick-up where safety and access issues warrant,
- paying for transit for students who meet distance thresholds but do not get yellow buses,
- integrating transportation and before/after school care, shared custody.

- 3. Do you have any specific examples of situations where safety and well-being is being compromised? What is the biggest risk to safety and well-being?**

Many Ontario boards cover urban, suburban and rural areas and yet, board transportation policies do not always differentiate between student needs in these environments. The time involved impacts student well-being and the safety issues are a constant worry for parents, including French immersion/extended parents.

*I lost bus access for my French immersion kids in 2016 when it was determined that kindergarten students within .08 km of the school were no longer eligible for buses and the walking distance for all students was upped to 1.6 km. Instead my children were expected to walk on one of the most travelled roads in the village with no sidewalks and no crossing guards. In winter, snow banks are not considered an obstacle by our board, so the kids are actually forced to walk down the middle of the road. I can apply for empty seats for my kids, but the bus stop is further from my house than the school.*

— Ottawa area Mom



## CANADIAN PARENTS FOR FRENCH ONTARIO

*My child walks to the local French immersion school which is SK to Grade 5. The school for Grade 6-8 is 11.7 km away. There used to be extra seats available on the school bus for Grade 6 but getting one is not guaranteed. At our Board, Grade 6 students and up are expected to take transit but the trip is going to be a bus, a subway ride, and another bus. We love immersion but the commute is not appealing and I worry about safety on transit and the very busy road without a crossing guard that my child will have to cross. If we had a school bus until the end of Grade 8, it would be much better.*

*– Toronto parent*

*We live on a farm half an hour south of Lindsay. When my oldest child started French immersion, I was a single mother with a young child and an unreliable vehicle. The bus would pick up him up at the end of our drive. I could see the bus coming down the road and send him out to meet it. It was safe. He was safe and protected from extreme cold weather, storms, traffic. I was able to focus on my farm work. The bus ride was 45 minutes each way and took both elementary and high school children. The young students sat behind the driver and the older ones escorted to and from the bus. There were 26 busses at the school in the morning and a few cars.*

*By the time he was in grade three, he had an hour and a half ride each way. The board had gone to double bussing and pick up points. Like my neighbours, we drove to a pick-up point at the intersection of a busy arterial road and our rural side road and a train crossing. No sidewalk, no light, and the speed limit - 80 km/h - a suggestion. Hundreds of us sat in our idling cars all over the region trying to stay warm and dry, waiting with our babies and preschoolers strapped in their car seats for the school bus while heavy dump trucks, snowplows and traffic went flying by at 100 km/h. It was dangerous and nerve wracking for all of us. The changes meant many more families in their cars either on the side of the road or at the school and considerably fewer busses at the school in the morning.*

*By the time my youngest started school, four years later, the bus ride was two hours each way...a four-year-old on the bus for four hours a day. After weeks of heated discussions with the school board, the ride was reduced by adding a second bus, but it was still over an hour each way and they arrived late every day.*

*When my son started high school, we went through the same ritual for two different bus times an hour apart. We had to be at the stop 10 minutes before bus time, sometimes waiting for twenty minutes or more for late buses or we would miss the pick up or drop off.... Four trips a day for a half hour each time, an hour apart.*

*Both my children were in bus accidents. One was never reported to the school until I drove by and saw my child's bus in the ditch with a hole in the side. The students had been transferred to*

*another bus and dropped off at school with no word to the school administration. My other child's bus was rear ended on a very cold day on an icy bridge. We were called to go pick them up. The children had to wait in the bus with the engine turned off while the driver waited for the OPP and parents to pick the children up.*

*My youngest graduated 3 years ago, but the situation is no better for families in my rural area today. The bus rides are longer, the pick-up points are further away and more dangerous than they were for mine. It is not conducive to learning readiness or good health. It is not good for the environment and it takes away work time for the parents*

*– Trillium Lakelands (Kawartha Lakes) Mom*

**4. How can we enhance safety and well-being in the transportation environment to ensure that it supports students' preparedness for learning during the school day?**

Ensure students arrive on time, safely, rested and ready to learn by developing clear provincially led criteria and policy for:

- Transportation for French immersion/extended programs for every JK-12 student in the programs at every school board on an equal basis to the transportation provided to English programs.
- Safe pick up/drop off points and provision for driveway pick-up/drop off where safety standards cannot be met
- Safe walking routes
- Walking distances
- Maximum time on the yellow bus
- Maximum time of commute on public transit
- No cost to students, family, guardians
- Non-transferable dedicated funding
- Reporting, auditing, compliance

**Accountability – quality assurance**

***1. Do you believe that we are receiving good value for the money spent on student transportation?***

Generally, yes. Many efficiencies and innovations have been implemented over the years but they are often at the expense of students. The funding is mostly based on historical funding not current realities. And, Boards can use the funds for other expenses. One size does not fit all – geography, availability of public transit, proximity to school, population density all factor into transportation models.

***3. When it comes to delivering responsive, equitable, and safe student transportation, what roles and/or responsibilities do you feel Ontario, school boards and transportation providers should have?***

School board transportation is a form of public transportation that is as important to public education as the teacher and the building. It is essential in meeting our Official Languages goals for French immersion/extended students.

Without school board provided and paid for transportation access to public education is compromised. School board transportation should pick up and deliver all children safely, ready to learn in both the regular English and French immersion/extended programs. Transportation needs to be safe and inclusive. The responsibility for the safe transportation of the students begins at the pick-up/drop off points, not just when the child boards the bus.

Currently, the province provides funding but it is a school board decision as to whether they provide transportation at all and with what parameters. Routes, pick up points and eligibility are set by the board in consultation with the school bus companies and the consortiums and are not always based on the needs of students and families.

The Ministry of Education needs to take the lead by developing clear criteria and policy for:

- Transportation for French immersion/extended programs for every JK-12 student in the programs at every school board on an equal basis to the transportation provided to English programs.
- Safe pick up/drop off points and provision for driveway pick-up/drop off where safety standards cannot be met
- Safe walking routes
- Walking distances
- Maximum time on the yellow bus
- Maximum time of commute on public transit

- No cost to students, family, guardians
- Non-transferable dedicated funding
- Reporting, auditing, compliance

School boards need to:

- acknowledge the frustration of the public and the obligation to provide equitable access to public education
- adjust service to current realities of before/after school care and shared custody arrangements
- Seek and include parent input in transportation decision making

Transportation providers, including school bus companies and public transportation, need to:

- provide detailed meaningful input into the discussion on safety, routes, service levels and costs of providing safe, reliable, equitable transportation to publicly funded education.

## ***2. What changes would create a more accountable and transparent transportation system?***

Adequate funding needs to be provided to meet improvements in service standards in urban, suburban and rural areas. The current funding is transferable, is not based on criteria or need, and there is no accountability.

Require accounting and public reporting on the following costs, service, efficiency and results:

- Locations of pick up, including driveway pick-ups/drop offs where safety or accessibility standards cannot be met
- Times of pick up/drop off
- Time on yellow bus, time on public transit
- Walking routes
- Walking distances
- # students transported
- # of students who commute on public transit
- Costs of public transit commutes
- Cost of school bus transportation
- # Late buses
- # Road and weather condition reports
- #Accidents
- Equity in transportation

‘Achieving Excellence’ says that ensuring equity means that “all children and students will be inspired to reach their full potential, with **access** to rich learning experiences that begin at birth and continue into adulthood.” The Ministry of Education in partnership with school boards, and transportation providers can provide better, safer, equitable transportation for our children.



TDSB-TCDSB Consortium Service for English, French Immersion, Extended French

	JK	SK	1	2	3	4	5	6	7	8	Secondary
TDSB-English	Yellow Bus- 1.6 km							Transit tickets-3.2 km *			Transit tickets-4.8 km
TDSB-FI	n/a	Yellow Bus- 1.6 km						Transit tickets-3.2 km *			Transit tickets-4.8 km
TDSB-Ext	n/a						Yellow Bus- 1.6 km	Transit tickets-3.2 km *			Transit tickets-4.8 km
TCDSB-English	Yellow Bus-1.5 km										None
TCDSB-FI	None										None
TCDSB-Ext	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Transit tickets*	Transit tickets*	Transit tickets*	None

Notes: TCDSB allows for transportation for FI from SK-8 in their policy at the same distance level as English. However, there is a caveat that this is only when funding is available. Since 2000 transportation budget has been in deficit, so no FI students are transported unless they have some kind of hardship as assessed by the principal. JK is now the starting point. Anomaly in TCDSB transportation policy – TTC tickets are provided for extended students but not immersion students.

\*TTC-Toronto Transit tickets are now free to age 12. Thus, ticket provision does not begin until age 13.





**PDSB – DBCDSB-UGDSB - Dufferin-Wellington County Consortium Service for English, French Immersion, Extended French**

	JK	SK	1	2	3	4	5	6	7	8	Secondary
PDSB-English	Yellow Bus- 1.0 km		Yellow Bus -1.6 km		Yellow Bus – 2.0 km		Yellow Bus – 2.0 km		Yellow Bus – 2.0 km		Yellow Bus – 3.8 km
PDSB-FI	n/a	n/a	Yellow Bus- 1.0 km	Yellow Bus -1.6 km		Yellow Bus – 2.0 km		Yellow Bus – 2.0 km		None	
PDSB-Ext	n/a						Yellow Bus – 2.0 km		Yellow Bus – 2.0 km		None
DPCDSB-English	Yellow Bus-1.0 km		Yellow Bus-1.6 km		Yellow Bus-1.6 – 2.0 km depending on consortium						Yellow Bus-3.2 km where no public transit
DPCDSB-FI	n/a	n/a	None							None	
DPCDSB-Ext	n/a				None						None
UGDSB-English	Yellow Bus -1.6 km				Yellow Bus-3.2 km						Yellow Bus-3.8 km
UGDSB-FI	Yellow Bus -1.6 km				Yellow Bus-3.2 km						Yellow Bus-3.8 km
UGDSB-Ext	n/a										

Notes: PDSB Walk to bus stop: Kindergarten students 0.4 km; Grade 1 – 6 students 0.8 km; Grade 7 – 12 students 1.2 km

UGDSB Walk to bus stop: JK-grade 3 students 0.8 km; Grade 4-12 students 1.2 km

UGDSB Maximum time on bus, where possible: JK-Grade students 45 minutes; Grade 7-12 students 60 minutes



OCDSB-OCSEB Consortium Service for English, French Immersion, Extended French

	JK	SK	1	2	3	4	5	6	7	8	Secondary
OCDSB-English	n/a		Yellow Bus-1.6 km								Transit or Yellow Bus 3.2 km
OCDSB-FI	Yellow Bus- 0.8 km		Yellow Bus- 1.6 km								
OCDSB-Ext	n/a										
OCSEB-English	n/a		n/a			Yellow Bus-1.6 km					Transit or Yellow Bus 3.2 km
OCSEB-FI	Yellow Bus-0.8 km		n/a			Yellow Bus-1.6 km					
OCSEB-Ext	n/a		Yellow Bus-1.6 km			n/a					

Notes: At OCDSB, every JK/SK student is in FI. Program can be English or FI in Grade 1. They also have Middle French Immersion in Grade 4.

OCSEB, JK/SK the program is FI, Grade 1-3 it is Extended, Grade 4 on it can be FI or English. All of the programs are at the home school.

WRDSB - WCDSB Consortium Service for English, French Immersion, Extended French

	JK	SK	1	2	3	4	5	6	7	8	Secondary
WRDSB-English	Yellow Bus-0.8 km	Yellow Bus-1.6 km	Yellow Bus-1.6 km								Transit or Yellow Bus 3.2 km
WRDSB-Fi	n/a		None								None
WRDSB-Ext	n/a										
WCDSB-English	Yellow Bus-0.8 km	Yellow Bus-1.6 km	Yellow Bus-1.6 km								Transit or Yellow Bus 3.2 km
WCDSB-Fi	n/a		None								None
WCDSB-Ext	n/a										

Notes: WRDSB and WCDSB will transport to French immersion if it is at your neighbourhood school and you meet the distance criteria. If your neighbourhood school does not have French immersion, parents are responsible for transporting their children to French immersion.

WCDSB: rural areas, they have laneway pickups or .5 km bus pick-up point; travel time limited to 1 hour; daycare pickups; no courtesy transportation; walk to bus (JK/SK 0.5 km, G1-8 1 km, G9-12 1.6 km)



LDSB-TBCDSB Consortium Service for English, French Immersion, Extended French

	JK	SK	1	2	3	4	5	6	7	8	Secondary
LDSB-English	0.4 km		0.8 km			1.6 km			1.6 km Transit or yellow bus	1.6 km Transit or yellow bus	1.6 km Transit or yellow bus
LDSB-FI	n/a	0.4 km	0.8 km			1.6 km			1.6 km Transit or yellow bus	1.6 km Transit or yellow bus	1.6 km Transit or yellow bus
LDSB-Ext	n/a										
TBCDSB-English	0.4 km		0.8 km			1.6 km			1.6 km Transit or yellow bus	1.6 km Transit or yellow bus	1.6 km Transit or yellow bus
TBCDSB-FI		0.4 km	0.8 km			1.6 km			1.6 km Transit or yellow bus	1.6 km Transit or yellow bus	1.6 km Transit or yellow bus
TBCDSB-Ext	n/a										

Notes:

TBCDSB: Policy 704 "transportation may be provided from up to two permanent pick-up points, and to one permanent drop-off point, within scheduled routes, to and from the student's designated home school." Consortium policy: [https://www.ststb.ca/application/files/2114/8958/7457/STS-ELG-003 Alternate Address Requests.pdf](https://www.ststb.ca/application/files/2114/8958/7457/STS-ELG-003%20Alternate%20Address%20Requests.pdf)

Consortium includes the French board, Conseil scolaire de district catholique des Aurores boréales

## Chapter 3

Ministry of Education

### Section 3.13

# Student Transportation

## 1.0 Background

### 1.1 Overview

In the 2013/14 school year, over 830,000 Ontario students were transported daily to and from publicly funded schools on approximately 19,000 school vehicles such as school buses, vans and cars. Almost all student transportation in Ontario is provided through contracts with school bus operators, and more than 70% of the children transported were in kindergarten or elementary school.

All school boards in the province provide some level of transportation services to elementary students, and most provide service to secondary students. *The Education Act* (Act) does not explicitly require school boards to provide transportation services. However, section 21 (2)(c) of the Act excuses a child from attending school if transportation is not provided by a school board and there is no school situated within the following distances from the child's residence:

- 1.6 kilometres for children under 7 years of age;
- 3.2 kilometres for children aged 7 to less than 10 years of age; and
- 4.8 kilometres for children over 10 years of age.

School boards base their students' eligibility for transportation services to a large extent on the distance from home to school. **Figure 1** shows the number of students transported in 2013/14, the last year for which data is available, by type of program or need.

**Figure 1: Number of Students Transported, Broken Down by Type of Program or Need, 2013/14**

Source of data: Ministry of Education, Student Transportation Survey for 2013/14

Type of Program or Need	#	%
<b>Students without special needs</b>		
General programs (students meet distance eligibility criteria)	570,014	68.3
Special programs – French Immersion	114,210	13.7
Special programs – other (eg., gifted, arts, music, technical)	18,720	2.2
Hazard (not eligible based on distance but hazardous walk for age/grade)	55,626	6.7
Courtesy (not eligible based on distance but empty seats are available)	33,323	4.0
<b>Subtotal</b>	<b>791,893</b>	
Students with special needs	39,798	4.8
Other (Section 23 schools and provincial schools*)	2,538	0.3
<b>Total</b>	<b>834,229</b>	<b>100.0</b>

\* Section 23 schools are correctional and custodial facilities. Provincial schools are operated by the Ministry of Education and provide education for students who are deaf or blind, or have severe learning disabilities.

## 1.2 Roles and Responsibilities in Providing Student Transportation

**Figure 2** illustrates the roles and responsibilities of the parties involved in transporting Ontario students to and from school.

### 1.2.1 Ministry of Education

The Ministry of Education (Ministry) provides funding to school boards through the Student Transportation Grant. It also conducts an annual survey of school boards on student transportation services across the province. The survey is completed and its results are provided to the Ministry by the transportation consortia. According to the Ministry, the survey is intended to support policy development by the Ministry and decision-making by school boards and consortia.

Between 2006 and 2011, the Ministry used external consultants to conduct initial effectiveness and efficiency reviews on the operations of transportation consortia in four areas: consortium management; development and implementation of policies and practices; routing and technology; and contract management. It used the overall rating as the basis for determining adjustments to transportation funding for boards that run a deficit in their transportation spending. The Ministry will conduct a follow-up review if the consortium that requests a review can demonstrate significant progress in implementing the recommendations made in the initial review.

### 1.2.2 School Boards

There are 72 school boards in the province. The Ministry of Education gives school boards autonomy and authority for student transportation. The boards are responsible for overall decisions related to providing student transportation, including establishing policies and eligibility criteria.

### 1.2.3 Transportation Consortia

There are 33 transportation consortia in the province. A transportation consortium is an organization formed by two to five school boards operating in the same geographical area (such as public, Catholic, French or English boards). To limit costs and increase efficiency in student transportation, the Ministry of Education in the 2006/07 school year asked all school boards to begin consolidating transportation functions into consortia that would provide services to boards in the same geographical areas; a few boards had already formed consortia at that time. At the time of our audit, all school boards, except one northern French Catholic board, were part of a consortium. Seventeen school boards are in more than one consortium because of overlapping boundaries. Consortia are responsible for:

- administering transportation policies of member school boards;
- planning transportation services (designing routes; identifying eligible students; determining student pickup and drop-off locations and times; managing student information needed by school bus operators);
- contracting with school bus operators to provide student transportation services;
- managing contracts with school bus operators, including monitoring service performance; and
- performing audits on school bus operators to ensure compliance with legislation and regulations, and with their contracts.

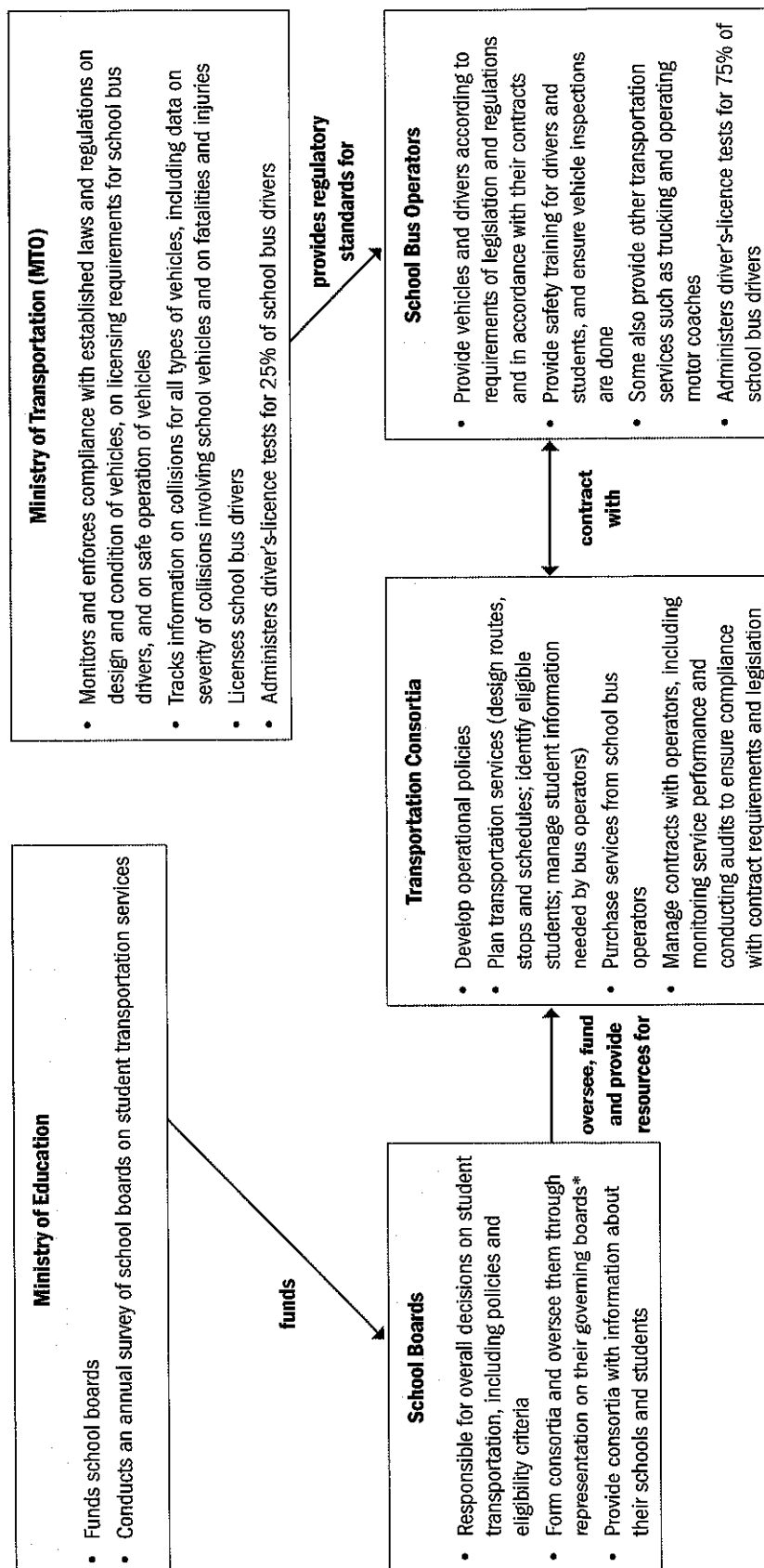
School boards are represented on the consortia's governing boards to provide oversight, and they provide consortia with key information about their schools and students (such as name, age, address and special needs).

### 1.2.4 School Bus Operators

There are more than 200 school bus operators in the province providing publicly funded student transportation services. School bus operators are

**Figure 2: Roles and Responsibilities of Parties Involved in Ontario Student Transportation**

Prepared by the Office of the Auditor General of Ontario



\* One school board is not part of a consortium and manages transportation services directly.

contracted by consortia to transport students. They are responsible for ensuring their vehicles and drivers meet requirements set out in legislation and regulations (such as having semi-annual vehicle inspections for mechanical fitness and maintaining drivers' daily log books, which record hours of service, breaks taken and mileage driven), and for complying with provisions set out in their contracts (such as providing safety training for drivers and students, and conducting background checks for drivers).

In the 2012/13 school year (the most recent year that this information was compiled), 19 school bus operators were each paid at least \$5 million for transporting students attending publicly funded schools. Two of these operators received 40% of the total of about \$760 million paid to all operators for home-to-school transportation.

### 1.2.5 Ministry of Transportation

The Ministry of Transportation (MTO) enforces federal and provincial laws and regulations that relate to the design and mechanical condition of vehicles, licensing requirements for school bus drivers and the safe operation of vehicles.

MTO has about 90 people employed in the Carrier Safety and Enforcement Branch in St. Catharines. These staff promote the safe operation of commercial vehicles in Ontario. This includes monitoring compliance with legislation for all types of vehicles, not just school vehicles. In addition, some of the approximately 250 enforcement officers located across the province conduct safety inspections of commercial vehicles (including school buses), conduct audits at the premises of commercial operators (including school bus operators) and investigate privately owned Motor Vehicle Inspection Stations, which inspect commercial and non-commercial vehicles (including school vehicles) for mechanical fitness.

## 1.3 Funding and Expenditures for Student Transportation

For the 2013/14 school year, the most recent year for which this information has been finalized, transportation grants to school boards totalled \$867 million, or about 4% of the \$21 billion of total operating funding available to school boards. Transportation grants are estimated to be \$880 million for the 2014/15 school year, as shown in Figure 3.

**Figure 3: School Board Funding, Actual Transportation Expenditures and Number of Students Transported, 2008/09–2014/15**

Source of data: Ministry of Education, Education Financial Information System, and Student Transportation Survey

School Year	Total School Board Operating Grant (\$ million)	Transportation Grant (\$ million)	Transportation Grant as a % of Total Operating Grants	Actual Transportation Expenditures* (\$ million)	Students Transported (#)
2008/09	18,892	816.0	4.3	815.2	817,918
2009/10	19,537	827.6	4.2	825.7	818,189
2010/11	20,271	839.8	4.1	840.6	824,024
2011/12	20,985	852.5	4.1	858.1	823,462
2012/13	20,967	850.0	4.1	852.9	833,685
2013/14	20,768	866.6	4.2	861.7	834,229
2014/15 estimate	22,449	880.0	3.9	Not yet available	Not yet available

\* When actual expenditures exceed grants received, school boards whose consortia have an effectiveness and efficiency review rating of moderate and above will receive, in whole or in part, additional funding to cover the shortfall in the year of review. This effectively resets the transportation funding in subsequent years. Otherwise, school boards have to make up the shortfall from other program areas.



**Figure 4: Breakdown of Student Transportation Expenditures, 2013/14**

Source of data: Ministry of Education, Student Transportation Survey for 2013/14

Expenditure	%
Contracted school vehicle services*	94
Consortium management	4
Student safety training and other	2
	<b>100</b>

\* Includes the cost of using taxis and public transit, which is covered by school boards.

Grants to school boards, including the student transportation grant, are calculated in accordance with regulation, and are initially based on budgets/estimates submitted by school boards in June for the upcoming school year (September to August). Grant amounts are revised in December when updated financial and enrolment information is received. The grant amount is finalized after school boards submit audited financial statements the following November.

As seen in Figure 4, over 90% of expenditures on student transportation are payments primarily to contracted bus operators. The remaining expenditures are for consortium management, student safety training and other costs. However, according to the Ministry of Education, school boards are free to use any portion of the transportation grant for non-transportation-related items such as classroom expenses (for example, textbooks) or non-classroom expenses (for example, school office supplies or administrative costs). Most other education funding components are also administered by the Ministry in a similar fashion.

## 2.0 Audit Objectives and Scope

The objectives of our audit were to assess whether effective systems and procedures were in place to safely and efficiently transport elementary and sec-

ondary school students; ensure the level of service across the province is equitable and based on need; and measure and report on performance in this regard.

Audit work was primarily conducted at three transportation consortia and the Ministry of Transportation, and to a lesser extent at school boards and the Ministry of Education. At the consortia, we reviewed their transportation planning, including the eligibility criteria applied; bus utilization; safety provisions included in contracts with school bus operators; training of students on riding the bus safely; oversight practices for ensuring operators maintain their vehicles and hire and train competent drivers; and whether collisions are tracked and analyzed. As well, we looked at the process used by consortia to develop efficient and safe routes. We also reviewed procurement practices used to acquire their current transportation services. The three consortia we visited were from two different regions and administered transportation services for a total of nine school boards. In the 2013/14 school year, these consortia accounted for almost 20% of student transportation costs incurred and students transported in the province, as shown in Figure 5.

We also sent a survey to the remaining 30 consortia across the province on key issues we identified during our consortium visits. All consortia responded to our survey.

At the Ministry of Transportation (MTO), we reviewed the frequency of ministry inspections of school buses, audits of school bus operators and investigations of privately owned Motor Vehicle Inspection Stations that conduct semi-annual mechanical inspections of school vehicles which carry six or more children. As well, we gained an understanding of the school bus driver licensing process, and assessed whether safety performance data, tracked by MTO (through its Commercial Vehicle Operator's Registration System—CVOR) and relied upon by consortia, is accurate and up to date.

**Figure 5: Details on Transportation Consortia Selected for Audit**

Source of data: Ministry of Education

				Students Transported, 2013/14	Actual Transportation Costs, 2013/14 (\$ million)
Consortia Visited	School Boards in Consortium	Type of Area Served	Jurisdictions in Area Served		
Toronto Student Transportation Group	Toronto District School Board ..... Toronto Catholic District School Board	Urban	Toronto	54,600	81.6
Student Transportation of Peel Region	Peel District School Board ..... Dufferin-Peel Catholic District School Board	Predominantly urban with some rural areas	Mississauga, Brampton, Caledon	64,000	54.4
Sudbury Student Services Consortium	Rainbow District School Board ..... Conseil scolaire du district du Grand Nord de l'Ontario ..... Sudbury Catholic District School Board ..... Conseil scolaire catholique du Nouvel-Ontario ..... Huron-Superior Catholic District School Board <sup>1</sup>	Predominantly rural with some urban areas	Greater Sudbury, Espanola, Manitoulin	21,300	26.5
Total				139,900 <sup>2</sup>	162.5 <sup>3</sup>

1. Huron-Superior Catholic District School Board is not a member of the Sudbury Student Services Consortium but it contracts services from the consortium.

2. This represents 17% of the total 834,229 students transported province-wide in 2013/14.

3. This represents 19% of the total \$861.7 million in actual transportation costs province-wide in 2013/14.

At the school boards, we met with senior school board management and select school board trustees to discuss their oversight of the consortia.

At the Ministry of Education, we reviewed the adequacy of the effectiveness and efficiency reviews of consortia and the basis for funding student transportation services. We also reviewed information obtained from the Ministry's annual transportation surveys of school boards.

We also met with members of the Transportation Committee of the Ontario Association of School Business Officials, whose members include consortium management; representatives from the Ontario School Bus Association and the Independent School Bus Operators Association, which advocate on behalf of school bus operators; and representatives from a union that represents almost 1,800 school bus drivers.

We also met with Colin Campbell, a retired Justice of the Ontario Superior Court, who in October 2014 was contracted by the Education Minister to chair an expert panel to identify best practices and explore options for acquiring student transportation services (other than requests for proposals for competitive procurement) that are in compliance with government procurement directives. At the time we were drafting this report, the review panel had not yet issued its report.

## 3.0 Summary

School vehicles are generally considered to be a safe mode of transportation based on the number of collisions in relation to the number of passengers

transported and kilometres travelled. The Ministry of Transportation reported that over the last five years, school vehicles have been involved in 5,600 collisions that have resulted in property damage, personal injuries and fatalities. Overall, in Ontario the risk of personal injury from collisions involving school vehicles is lower than for other types of vehicles, and the risk of fatalities is similar to that for all other types of vehicles. However, in 2013, the latest year for which information is available, Ontario's school vehicles were involved in more collisions proportionately than automobiles and trucks but fewer than other types of buses, based on total number of vehicles by type. Specifically, 12% of school buses were involved in collisions, compared to 4% of automobiles, 2% of trucks and 16% of other buses. The police determined that the school bus driver was at fault in 40% of the cases; the bus driver was not at fault in 54% of cases and in 6% of cases the cause of the collision could not be determined.

Only limited information is being tracked by consortia on incidents impacting children such as late buses and mechanical breakdowns of vehicles. With the limited information available to us during our audit, we noted an increase in such incidents between 2012/13 and 2013/14.

Nevertheless, the potential of risk to students being transported makes it important that the Ministry of Education, school boards and transportation consortia, and the Ministry of Transportation continue to consider and minimize risk factors in three key areas that impact the safe transport of students: bus driver competence, vehicle condition and student behaviour. Based on our audit we concluded that better oversight of bus operators and their drivers, better processes for ensuring the safe operation of school vehicles, better training for students in bus safety, and better tracking and analysis of collisions and incidents may even further reduce risks to students.

### Safe Transport of Students

The following are some of our key observations regarding the safe transport of students:

- **Better oversight and monitoring needed to ensure school bus driver competence.** Although there is a rigorous process for licensing school bus drivers and renewing their licences every five years, we noted weakness in the consortia's oversight processes to determine if drivers were competent. Consortia we visited normally gave bus operators advance notice of all operational reviews, and one consortium let school bus operators select the driver files to be reviewed. Part of the review included route audits to verify that bus drivers follow the planned route, stop at all assigned stops and perform their duties safely. We noted that route audits were infrequent and, in the case of one consortium, ineffective, as the driver was aware of the audit because the assessor would ride along on the bus as opposed to following the bus without the driver knowing. When the reviews did uncover issues such as some drivers not having the required criminal-record screening checks, only one of the three consortia we visited was reasonably diligent in ensuring that the operators rectified the problems noted.
- **Improvements needed in ensuring school vehicles are in good condition.** Contracts with school bus operators stipulate the maximum and average age permitted for a school bus. Our review at the three consortia we visited noted that most vehicles were under the maximum age of 12 years, but each consortium had operators using at least one type of vehicle that exceeded the average age requirement (typically seven years). We noted that the process used by consortia to determine if school vehicles were in good condition was weak. Only two consortia visually inspected the condition of school buses, and they selected for inspection only a small number of those buses that were on site on the day

- of the inspection. Similarly, the Ministry of Transportation's inspection process for school vehicles needs improvement. We noted that it was not targeting those vehicles most at risk for safety violations, performing inspections on a timely basis, or ensuring that defects noted during inspection were fixed.
- **Ministry of Transportation not aware of all school buses on the road.** The number of school vehicles recorded in the Ministry of Transportation's bus inspection tracking system was less than the number of school vehicles contracted by transportation consortia. In the 2013/14 Ministry of Education survey, the consortia reported to the Ministry of Education that they had contracted about 19,000 school vehicles from operators; the system, however, lists only about 16,000. The number of school vehicles in the system should be much higher than the number contracted by consortia because it should also include school vehicles used by private schools and other organizations.
  - **Little oversight of school bus operators that are allowed to certify their own buses for mechanical fitness.** The Ministry of Transportation allows licensed privately operated Motor Vehicle Inspection Stations, including those operated by school bus operators, to conduct semi-annual mechanical inspections of school buses and certify them. The Ministry of Transportation provides little oversight of these stations to ensure they conduct thorough inspections. We found that over the last five years only 12 stations belonging to school bus operators had been inspected by the Ministry of Transportation.
  - **The Ministry of Education has not mandated a bus safety training requirement for students riding school buses.** It is up to each consortium to determine whether or not it will offer bus safety programs to its students, and which programs to offer. Only 16 of 33 consortia in the province had made general

school bus safety training mandatory, and only five had mandatory orientation for new riders.

- **Many consortia were not collecting their own information on collisions and incidents involving school vehicles to identify problems and take corrective action.** Only four of 33 consortia were able to provide us with statistics on all the categories of incidents that we requested, and only half were able to provide us with complete information on collisions. Incidents include buses breaking down or dropping students off at the wrong stop, student injuries and behaviour issues, and other problems. The Ministry of Education has not set any guidelines for the reporting of school vehicle collisions and incidents among consortia, to enable analysis of their causes and to develop strategies to prevent them in the future.

### Efficient Transportation of Students

Our audit noted differences in how transportation consortia operated and managed student busing services—for example, in the degree to which they employed efficiency strategies, in the level of service provided and in costs per student transported. We noted that the ability of a consortium to efficiently and effectively manage transportation services is impacted by the level of authority delegated to it by the school boards it serves, and the willingness of school boards to work co-operatively and integrate services. Although consortia have implemented efficiency measures to varying degrees to improve the efficiency of school transportation services and, in turn reduce costs, they could be doing more.

Our key observations regarding the efficient delivery of service, the level of service provided, funding and procurement practices are as follows:

- **Funding for school transportation is not based on need.** Instead, it is based on each board's 1997 spending level, with annual adjustments for enrolment and inflation, and

other minor adjustments such as fuel costs and safety initiatives. The Ministry of Education's funding formula does not take into account local factors that can significantly influence transportation costs, such as enrolment density, geography, the availability of public transit, the number of students with special needs, and hazards on the route. In 2004, the Ministry began testing a new funding formula based on need. However, due to significant pushback, especially from boards that expected to get less, the Ministry abandoned the new funding model and continued with the status quo.

- **School busing is not available on an equal basis to students across the province.** There are significant differences in student eligibility for busing services across the province. For example, three boards do not provide busing services to secondary students who do not have special needs. The percentage of students for whom consortia have arranged school transportation varies significantly between boards, from 10% to 87%. This results from differences in geography, student population density and availability of public transit, but the boards' differing eligibility criteria are also a factor. We noted that eligibility criteria for busing even varied among school boards served by the same consortium and among schools within the same board. Ontario has no provincial eligibility standard for busing, and, as a result, school boards can determine which groups of students they will provide transportation for and spend their funding on.
- **Although the cost of transporting students varies widely among school boards, the Ministry of Education has not followed up with the boards to determine if these variances are justified.** The average cost to transport a student without special needs, based on the Ministry's 2013/14 student transportation survey, was \$740, with a range

between boards of \$365 to \$1,680. The average cost to transport a student with special needs was \$4,650, with a range between boards of \$1,045 to \$11,205. A significant portion of this disparity is due to differences in geography, student population density and other local factors. But the Ministry has not determined if the disparity is also partly due to inefficiencies in providing busing services such as, not optimizing route planning software and co-ordinating common days off between school boards.

- **Reliable bus utilization data is not available.** In general, consortia did not have reliable bus utilization statistics because they did not typically track the number of riders. In addition, each consortium set its own capacity for a bus and used different methods to calculate the utilization rate. Consortia usually based the number of buses needed on the number of students eligible for busing. However, head counts that drivers performed on three consecutive days at one consortium we visited showed that only about 70% of the students it had planned would use school transportation were actually using the service. This may indicate that the consortium had excess capacity and was incurring unnecessary costs.
- **Consortia are contracting for more bus services than they actually need.** Two of the consortia we visited were using their buses less than the time negotiated in their contracts with bus operators. For example, one consortium had negotiated a base rate for three hours a day for its large buses, but we found that it used about two-thirds of these buses for two hours or less each day. The consortium could save money if it contracted fewer buses and used them for additional trips.
- **Only about 50% of the consortia in the province had competitively procured their current transportation services.** The last time one consortium we visited had

competitively procured busing services was in 2006. We reviewed the latest competitive procurement process followed by each of the three consortia we visited and noted that, although all had evaluated qualitative factors, only two consortia based their selection decision on both quality and price. One consortium had selected school bus operators entirely on price. The two that considered both qualitative factors and price weighed qualitative criteria at 65% and criteria related to price at 35%, which is in line with best practice information we received from Supply Chain Ontario (the government's procurement experts). We would have expected all three consortia to allocate high marks to safety-related criteria. But we noted that the weighting of safety criteria varied significantly among the three consortia, ranging from a high of 65% to a low of 26% of the total qualitative score.

This report contains 15 recommendations, consisting of 31 actions, to address the findings noted during this audit.

#### OVERALL RESPONSE FROM THE MINISTRY OF EDUCATION

Elementary and secondary education in Ontario is governed by the *Education Act*, which states that school boards are self-governing bodies. They are responsible for developing programs and policies, including those for transportation, that meet their local needs. The Ministry will encourage and support the Ontario Association of School Business Officials Transportation sub-committee to address these issues at a provincial level.

#### OVERALL RESPONSE FROM THE MINISTRY OF TRANSPORTATION

The Ministry of Transportation appreciates the insights and recommendations of the Auditor General and is strongly committed to continu-

ously improving the safety of all commercial vehicles operating in Ontario, including school buses and other school-purpose vehicles.

The Ministry believes that its school bus inspection program is among the most comprehensive and stringent in North America, and the recommendations from this report will help build on the improvements and initiatives that are already under way.

## 4.0 Detailed Audit Observations

### 4.1 Oversight Processes for Safety Can be Improved

School vehicles are generally considered to be a safe mode of transportation, as compared to other vehicles, based on the number of collisions in relation to the number of passengers transported and kilometres travelled. Even so, over the years school vehicles have been involved in collisions that have resulted in student fatalities, injuries and property damage.

The Ministry of Transportation (MTO) reports on collisions for all types of vehicles, including school vehicles, based on police reports. In its Ontario Road Safety Annual Report, MTO reports collisions that result in a fatality or injury, or where the damage to property is \$1,000 or more. We reviewed collision data involving school vehicles during school days from September to June inclusively, for the latest five-year period for which information was available (2008/09–2012/13). As shown in **Figure 6**, the number of collisions involving school vehicles has been relatively constant over the last four years. The risk of collisions resulting in death is 0.2%, which is similar to that for all vehicle types combined. However, the risk of collisions resulting in personal injury is comparatively lower at 14% for school vehicles compared to 23% for all vehicle types combined. Over the same period, school bus drivers were found to be at fault in about

**Figure 6: Collisions on School Days Involving School Vehicles**

Source of data: Ministry of Transportation

	Severity of Collision*						Total Collisions	
	Fatalities		Personal Injury		Property Damage			
School Year	#	%	#	%	#	%	#	%
2008/09	7	0.6	185	14.3	1,100	85.1	1,292	100
2009/10	2	0.2	154	14.5	903	85.3	1,059	100
2010/11	—	0.0	162	14.0	992	86.0	1,154	100
2011/12	3	0.3	154	15.3	848	84.4	1,005	100
2012/13	2	0.2	150	13.5	956	86.3	1,108	100
Total	14		805		4,799		5,618	
5-Year Average	3	0.2	161	14.3	960	85.4	1,124	100

\* Any collision that resulted in more than one category of severity (e.g., Personal Injury and Property Damage) is recorded once in the most severe category (e.g., Personal Injury).

40% of these cases. This is slightly better than the at-fault rate of about 45% for drivers of all other vehicles. In 2013, the latest year for which information is available, Ontario's school vehicles were involved in more collisions proportionately than automobiles and trucks but fewer than other types of buses, based on total number of vehicles by type. Specifically, 12% of school buses were involved in collisions, compared to 4% of automobiles, 2% of trucks and 16% for other buses.

Transporting students safely is influenced by three key factors, discussed below:

- bus driver competence;
- vehicle condition; and
- student behaviour.

#### 4.1.1 Driver Competence and Vehicle Condition

Both the transportation consortia and the Ministry of Transportation play a role in ensuring proper vehicle condition and driver competence in order to minimize risks in transporting students.

##### Transportation Consortia

Transportation consortia contract with school bus operators that provide student busing services. The consortia conduct annual operational reviews on

operators to confirm driver competence, vehicle safety, and compliance with contract requirements. To help ensure driver competence, consortia verify that drivers have valid licences, have had a criminal record check, meet training requirements, and do not exceed the legislated maximum hours on the road. They also follow drivers on a route to see if they are following the route correctly and obeying consortium safety policies when picking up and dropping off students.

To help ensure vehicle safety, consortia test a sample of school vehicles to see if they have undergone the required preventative maintenance checks, pre-trip inspections (where the driver checks the vehicle prior to each trip) and semi-annual mechanical inspections. Their contracts with school bus operators contain vehicle age requirements.

##### School Bus Driver Credentials and Training

In general, a school bus driver requires a licence (class B or E) in addition to a G class driver's licence. A driver must have successfully completed a knowledge test, road test, vision test, criminal record check and the school bus driver improvement course, and submitted a medical report. Applicants also must not have accumulated more than six demerit points.

Licences for school bus drivers are renewed every five years. The renewal process requires drivers to complete a vision and knowledge test and submit a medical report. Drivers aged 46–64 must submit more frequent medical reports, every three years, and drivers 65 years and older must submit a medical report every year.

#### **Unable to Correlate the Impact of School Bus Driver Turnover with Safety**

We were told by transportation consortia, school bus operators and a union representing school bus drivers about their concerns over the increase in driver turnover over the years. These groups felt that driver continuity and familiarity with the route and the students on the bus is critical to student safety. We reviewed the turnover rates provided by all school bus operators servicing the three consortia we visited and noted that they ranged from 14% to 27% in 2013/14. We compared these rates to different indicators of safety at the consortia, such as accidents and incidents on the bus, and did not find a correlation. However, as noted in **Section 4.1.4**, information on incidents and collisions is not well tracked in general and may not be reliable for this potentially useful comparison.

#### **Some Bus Operators Use Buses That Are Older Than Their Contracts Require**

Maintenance costs and safety concerns increase as vehicles get older. In order to reduce the risk of using unsafe vehicles, the consortia we visited included requirements in their contracts with bus operators outlining the maximum age permitted for school vehicles used to transport students, as well as the vehicles' average age. We reviewed a number of contracts at the three consortia and noted that they usually stipulated a maximum age of 12 years and an average age of seven years for the bus type and per operator. Our review noted that most vehicles were under the maximum age, but at each consortium we identified operators using at least one type of vehicle that exceeded the average age requirement. Specifically, one-third of the operators at one consortium we visited and all the operators

at another consortium have at least one type of bus that exceeded the average age.

#### **Weaknesses in Operational Reviews of Bus Operators Conducted by Consortia**

We had a number of concerns with the annual operational reviews conducted by the three transportation consortia we visited. Overall, the consortia we visited selected a very small number of drivers and vehicles from each contracted school bus operator for annual review.

In evaluating driver competence, the consortia normally gave bus operators advance notice of all operational reviews, and one consortium let operators select which drivers' files were to be reviewed. Because these practices allow bus operators to prepare for their review, their performance on that day may not be typical of their usual practices. This raises doubts about the reliability of the reviews. The consortia also performed route audits to verify that bus drivers follow the planned route, stop at all assigned stops and perform their duties safely. However, they conducted these route audits infrequently, with one consortium conducting them only as a result of complaints it received. Auditing practices were also inconsistent, with one consortium's assessor riding on the bus so that the driver was aware of the audit. This consortium told us that it periodically used the GPS software on buses to verify drivers' compliance in following the established bus route and activating the vehicle's safety mechanisms (such as alternating lights and stop arms). However, the extent of this activity was not tracked.

When the operational reviews did uncover issues such as some drivers not having the required vulnerable sector screening checks, drivers' first aid training being out of date or driver abstracts (official Ontario driver performance records) missing from files, only one of the three consortia we visited regularly followed up to ensure that these were rectified. Another consortium followed up on only some issues. At the third consortium, poor documentation made it difficult to assess whether



problems had been appropriately rectified by the operator.

When it came to evaluating vehicle safety, only two consortia visually inspected the condition of buses as part of the operational review, in addition to checking maintenance and inspection records. The buses selected for inspection, however, might not have been representative of the buses actually in use. This is because the sample chosen was not based on the total population of buses, but rather on the vehicles that were present at the operator's premises at the time of the review.

## RECOMMENDATION 1

The transportation consortia in conjunction with school boards should:

- develop and conduct consistent and effective oversight processes for school bus operators to confirm their compliance with contract and legal requirements for driver competence and vehicle condition; and
- track the rate of bus driver turnover, along with accidents and incidents such as dropping students at the wrong stop, to help determine if there is a link between driver turnover and safety risks, and if action is needed.

## TRANSPORTATION CONSORTIA RESPONSE

All three consortia were in agreement with this recommendation. The consortia stated that successful implementation would best be achieved through the Ontario Association of School Business Officials Transportation subcommittee. This would allow for input and discussion by all consortia, and enable the development of uniform processes across the province for the effective oversight of school bus operators and for tracking the relationship between bus driver turnover and accidents and incidents.

## Ministry of Transportation

The Ministry of Transportation (MTO) has a number of roles in enforcing driver competence and vehicle safety. MTO issues licences to school bus drivers and is to enforce school bus operators' compliance with federal and provincial legislation and regulations for the safe operation of vehicles. It administers a safety monitoring and intervention program for commercial vehicle operators (including school bus operators) by assigning each a safety rating based on their record of traffic infractions, collisions, inspections, and the results of facility audits; and by monitoring these ratings. It undertakes facility audits at the offices of school bus operators to assess whether the operator has controls in place that ensure that:

- drivers are properly qualified and are complying with the maximum hours of driving requirements; and
- vehicles are in good condition.

To determine vehicle safety and compliance with legislation and highway safety standards, MTO conducts physical safety inspections of school buses and their drivers at various locations, including terminals where the vehicles are kept by bus operators. During facility audits at operators' offices, it checks documentation to determine whether vehicles are being properly maintained and have been formally inspected twice a year. As well, MTO investigates complaints regarding privately operated Motor Vehicle Inspection Stations, which certify school vehicles for mechanical fitness.

## Effectiveness of School Bus Driver Improvement Program Not Monitored

In 2008, the Ministry of Transportation implemented a new School Bus Driver Improvement Program as a requirement of obtaining a school bus driver's licence under the *Highway Traffic Act*. However, it was up to each school bus operator or third party that was approved to provide this course to develop and deliver the course in conformity with standards set by MTO. Although required to do so, the Ministry has not monitored the delivery of the course, nor has it reviewed the effectiveness

of the program to determine whether it has made an impact on safety in the industry. Since that time, our review of police at-fault collision statistics has indicated little or no improvement in bus driver performance. Consistently, for each year from 2008/09 to 2012/13, for collisions involving school vehicles, the police determined that the school bus driver was at fault in about 40% of cases. For the remaining collisions, either the bus driver was not at fault (54% of cases) or the cause of the collision could not be determined (6% of cases).

## RECOMMENDATION 2

To help promote good practices and safe driving by drivers of school vehicles, the Ministry of Transportation should monitor the delivery of the School Bus Driver Improvement Program and review its effectiveness.

### MINISTRY OF TRANSPORTATION RESPONSE

The Ministry is currently reviewing the auditing and oversight regime for all driver-training-related programs, including the School Bus Driver Improvement Program, and is establishing an audit framework to provide for its effective monitoring.

#### Improvements Needed to the Commercial Vehicle Operators' Registration (CVOR) Program

MTO's Commercial Vehicle Operators' Registration program, or CVOR, tracks the on-road performance of school buses and other buses and trucks. It assigns points for drivers' traffic violation convictions, collisions, results of vehicle inspections and audits by MTO at the operator's place of business. The points assigned are compared against distance travelled and fleet size to determine a school bus operator's safety rating. A poor rating may result in a warning letter from MTO, an audit on the operator's operations, an interview or removal of the operator's right to operate in Ontario. Our concerns with MTO's CVOR program as it affects school buses were as follows.

Safety ratings of school bus operators were not always up to date. We reviewed a number of safety violations and found that information provided by the courts (convictions) or the police (collision statistics) took a considerable time to appear in the rating. Half of the convictions took at least 83 days, and half of the collisions took at least 105 days to appear in the rating. We also found that when a traffic violation is challenged in court it is not entered into the operator's rating unless the person is convicted; sometimes it took more than 300 days from the date of the violation before it appeared in the rating. Similarly, we noted that in some cases it took about two years for an accident to appear in the rating. This is a concern, as operators' safety ratings take violations into account for only 24 months following the date they occur. Therefore, the time lag between the date the violation occurred and the date it is considered in the rating shortens the time the violation appears on the safety rating, and in turn could delay or prevent any needed intervention by MTO.

Because operators self-report the distances their buses are driven, there is a risk they can manipulate the numbers to obtain a more favourable safety rating. An operator's safety rating improves with the number of vehicles and kilometres driven. This information, however, is not verified by MTO. A 2013 consultant's study on the effectiveness of the CVOR program recommended that MTO consider implementing measures to verify the number of vehicles and kilometres travelled reported by operators.

CVOR safety ratings are of limited use to transportation consortia in helping them assess the safety record of locally contracted school bus operators. The rating consolidates safety information for all of an operator's locations and for all of its commercial vehicles of every type, including vehicles not used for transporting students. Numbers and types of violations can vary by location, as each location may be operated independently, and different types of vehicles have different levels of risk. The consortia we visited informed us that they

need better safety information on the school buses in their own locations.

### RECOMMENDATION 3

In order for the Commercial Vehicle Operators' Registration program (CVOR) to effectively track the on-road performance of school buses and trigger ministry intervention when school bus operators' ratings reach unacceptable levels, the Ministry of Transportation should:

- ensure that safety infractions are updated in the CVOR in a timely manner and that these are reflected in the operator's safety rating for the full 24 months from the time the infraction is input into the system;
- ensure that information in the CVOR is easy to interpret and provides safety information on local terminals of school bus operators; and
- consider ways to verify the accuracy of self-reported information on the number of vehicles in the operators' fleets and the number of kilometres driven.

#### MINISTRY OF TRANSPORTATION RESPONSE

The Ministry agrees with the Auditor General that the timely tracking of safety factors is an important tool for the provision of safe school vehicles.

The Ministry of Transportation's Carrier Safety Program is aligned with the National Safety Code Standards, a set of nationally agreed-upon standards covering a number of vehicle- and driver-related areas. The CVOR program is based on National Safety Code Standard 7 – Carrier Profile, which establishes the standards across Canada for convictions, collisions and Commercial Vehicle Safety Alliance inspections as the elements to be monitored and measured on a carrier's profile. This standard mandates that the "offence date" of the infraction is the date on which an infraction should be

noted on the record. An offence cannot be noted on the record until there is a conviction. While the Ministry recognizes that use of the offence date can result in delays in getting the infraction on record, collisions are getting on record more quickly now that police services have access to the "e-collision" program. Please note, though, that any necessary further investigation undertaken before the collision is submitted could pose delays. Ontario will continue to raise the concern with data entry delays with its national safety partners to see if there is a willingness to review the National Safety Code Standard, including reflecting events in the CVOR rating for a full 24 months. Changing Ontario standards in isolation would result in a lack of alignment across provinces and states.

The Ministry is also currently modernizing its driver, vehicle and carrier information technology systems to streamline processes and meet demands for more efficient and accessible services. The new Registration and Licensing System of Ontario will include revisions to the layout and format of the CVOR abstract to make it easier to understand a carrier's safety performance record.

The suggestion to provide safety information by terminal is challenging, as safety ratings and facility audits are operator-based in alignment with National Safety Code Standards. Also, operators move vehicles among their terminals to meet operational needs. Commercial Vehicle Safety Alliance (or enforcement) inspections performed at local terminals are the only terminal-based information available. The Ministry of Transportation is committed to working with the Ministry of Education, School Boards and Transportation Consortia to improve information sharing in this regard.

The Ministry already verifies some self-reported information during facility audits, and is also looking at additional ways to verify the accuracy of self-reported information. For example, future revisions to our systems may

enable utilizing odometer readings captured as part of the required semi-annual inspection.

#### Few School Bus Operator Facilities Are Audited

The Ministry of Transportation does not audit or inspect all school bus operators' facilities on a regular basis. As noted earlier, facility audits at operators' offices examine safety management controls for both driver competence and vehicle safety. They include checks of records of preventive maintenance, pre-trip inspection of buses, drivers' logs, licences and training. Facility audits may be triggered when an operator's safety rating in the CVOR (described earlier) reaches a significant level—for example, because of collisions, convictions and violations found in vehicle inspections. They can also be done when complaints are received or if an operator volunteers for an audit to improve its safety record. Because the threshold for audits is set for all commercial vehicles, few school bus operators reach the threshold for audit. Therefore, even though MTO follows its policy in regard to facility audits, the policy is of limited usefulness in helping increase the safety of school transportation. In the past five years, MTO has conducted only 24 facility audits on 19 school bus operators.

### RECOMMENDATION 4

To help increase the safety of school transportation, the Ministry of Transportation should consider changing the threshold that triggers a facility audit for school bus operators.

#### MINISTRY OF TRANSPORTATION RESPONSE

The CVOR program is intended to take action with those operators identified at the highest risk of being or becoming unsafe. School bus operators are rarely subjected to a facility audit, as this is a very safe industry that doesn't often reach the predetermined threshold level to trigger a facility audit. However, the Ministry will do further analyses and establish an interven-

tion protocol specific to school bus operators based on the operator's safety performance.

#### Improvement Needed in Inspections of School Vehicles by the Ministry of Transportation

The Ministry of Transportation conducts safety inspections on all types of commercial vehicles on a regular basis, including the approximately 19,000 school vehicles with six or more seats that are used by school bus operators to transport students. Inspections may be known in advance or may be unannounced, and are conducted by MTO inspection officers, or sometimes by police officers with special training. A sample of school buses at each location used by an operator (referred to as a terminal) is chosen for inspection. In 2014, MTO officers inspected about 2,355 school vehicles. Our concerns with MTO's inspection process for school buses were as follows:

- **Inspections not timely.** We reviewed a number of school bus inspections and noted that more than 90% were not completed within the time frames stipulated by MTO's risk-based inspection approach. The average delay was almost three months, and the longest delay almost a year and a half.
- **Lack of evidence that required repairs were made.** During an inspection, when a violation or serious infraction (that is, a violation that takes the vehicle off the road) is noted, either the bus operator fixes it on the spot and the inspector verifies the fix and signs off on it, or the inspector issues a repair verification order that requires the operator to make the repair within 14 days and submit receipts to the inspector. However, in two-thirds of our sample of inspections with violations or serious infractions, there was no documented evidence that repairs had been made or that a repair verification order was issued as required.
- **Coverage of inspections incomplete.** We noted that over the past five years, MTO conducted 14,000 inspections on only 8,500 individual school vehicles—indicating that

many of these buses had been inspected multiple times over this period, some more than five times, while many had not been inspected at all. MTO inspectors generally inspected vehicles that were at the operator's terminal at the time, rather than selecting their sample from the total number of buses in the operator's fleet at that terminal. Also, MTO's policy requires that 40% of the sample of buses to be inspected should consist of newer buses (up to five years old) and 60% should consist of higher-risk older buses (more than five years old). Our review of a sample of inspections found that over 30% of inspections included more new buses than required and fewer older ones. For example, in one case where MTO was to inspect a sample of three new and five old buses, it actually inspected eight new buses.

#### The Ministry of Transportation's Bus Inspection Tracking System Not Complete or Accurate

Ministry of Transportation inspectors use the Bus Inspection Tracking System (system) to select operators' terminals (locations where buses are kept) for inspections of school vehicles. However, the information in the system is not always current. The system contains information on the location of terminals, the number of school vehicles by size, vehicles' last and next inspection date, and issues found during inspections at each terminal—but there is no mechanism for operators to inform MTO when terminals shut down and new ones open, the number of buses at a terminal changes, or a bus moves to a different terminal. Information in the system is updated only if the inspector becomes aware of changes during the year or after conducting an inspection. To illustrate:

- The number of school vehicles recorded in the system was less than the number of school vehicles contracted by transportation consortia. In the 2013/14 Ministry of Education (Ministry) survey, the consortia reported to the Ministry that they had contracted about 19,000 school vehicles from operators; the

system, however, lists only about 16,000.

The number of school vehicles in the system should be much higher than the number contracted by consortia, because it should also include school vehicles used by private schools and other organizations.

- The system contained inaccurate information on the location of operator terminals. We requested information from a sample of operators on the number of terminals they operated and compared this information to what was in MTO's system. In nearly 50% of our sample, the information differed. Either the location of terminals was different or the terminal was not listed in the system. If the terminal was not listed in the system, it would likely not be inspected.

### RECOMMENDATION 5

To increase the effectiveness of its safety inspections of school buses at operators' terminals, the Ministry of Transportation (MTO) should:

- update and maintain its Bus Inspection Tracking System with complete and accurate information on the location of operators' terminals and school vehicles at each terminal;
- have inspectors focus on school buses considered to be high risk and those that have not been inspected recently;
- complete safety inspections of school buses within the time frames stipulated by MTO's risk-based inspection approach; and
- obtain evidence that violations or infractions noted during school bus inspections are rectified in a timely manner by a school bus operator.

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2015, 2016

The Ministry is currently modernizing its driver, vehicle and carrier information technology systems to streamline processes and meet demands for more efficient and accessible services. Future

revisions to the Registration and Licensing System of Ontario will enhance our ability to track and monitor the bus inspection program.

The Ministry acknowledges the Auditor General's concern and will undertake a review of its Bus Terminal Inspection protocol to ensure enforcement resources are targeting higher-risk school buses.

The Ministry of Transportation is also in discussions with the Ministry of Education, school boards and transportation consortia to determine how we can obtain more accurate information on the location of operators' terminals and school vehicles at each terminal.

The Ministry has taken steps to complete inspections that were overdue at the time of the audit. In light of the Auditor General's recommendations, the Ministry will also review its current policies and procedures and make any necessary changes to ensure they are effective and align with road safety objectives. It will also reaffirm expectations with field staff.

#### Limited Ministry of Transportation Oversight of Privately Operated Motor Vehicle Inspection Stations Responsible for Certifying the Safety of School Vehicles

The *Highway Traffic Act* requires school vehicles used for transporting six or more persons to have annual and semi-annual mechanical inspections at licensed privately operated Motor Vehicle Inspection Stations (MVISs). The Ministry of Transportation provides little oversight of MVISs to ensure that they conduct thorough inspections before certifying school vehicles. This oversight is especially important, since many school bus operators are licensed by MTO to have their own MVIS, which they can use to conduct the required inspections on their own fleet of vehicles. The Ministry investigates these stations only when complaints are made by the public or issues are noted by inspectors in the district offices. Over the last five years, only 12 stations where school bus operators were inspecting their own buses have been investigated. These investigations found some stations operating

without a licence, and questioned the effectiveness of the mechanical inspections performed at other stations.

We also found that MTO has very little assurance that all school vehicles are undergoing the required annual and semi-annual mechanical inspections. Following an inspection, there is no requirement for the MVISs to report to MTO.

### RECOMMENDATION 6

To ensure that Motor Vehicle Inspection Stations (MVISs) are conducting effective mechanical inspections, the Ministry of Transportation should:

- devise a strategy that enables it to conduct risk-based reviews of MVISs, especially those that are run by school bus operators licensed to inspect their own school vehicles; and
- require the MVIS to submit its results of annual and semi-annual inspections for tracking in situations where concerns are identified, as confirmation that its school vehicles have undergone the necessary mechanical inspection.

### MINISTRY OF TRANSPORTATION RESPONSE

The Ministry agrees that improvements can be made to Ontario's MVIS program. The *Making Ontario's Roads Safer Act, 2015*, includes enabling provisions that allow for changes to the program that are expected to considerably improve program standards through automated or electronic delivery of inspection certificates and enhanced monitoring and sanctioning capacity.

As the Ministry works to define the business requirements for the transformed MVIS program, consideration will be given to effectively tracking annual and semi-annual inspections.

### 4.1.2 Improvements in Information Sharing Are Needed

There is no protocol for information sharing between the Ministry of Transportation, school boards, transportation consortia and the Ministry of Education, nor does the Ministry of Education receive or request reports or specific information regarding school bus safety from these other participants. Sharing such information is needed to ensure that each participant is aware of any issues uncovered by the others regarding bus operators and the safety of their operations, so that appropriate action can be taken to improve the safety of student transportation services.

Within the education sector, we found that there is good collaboration and sharing of information and best practices among the management of different consortia, mainly through a subcommittee of the Ontario Association of School Business Officials. At times school board and Ministry of Education staff also attend these meetings. Also, consortium managers often conduct their own surveys as needed and share information on various issues, such as policies on bus cancellation due to inclement weather and transportation for special programs.

#### RECOMMENDATION 7

The Ministry of Transportation, in conjunction with the Ministry of Education, school boards and transportation consortia, should develop a protocol to share information on the results of their inspections and audits of school bus operators and motor vehicle inspection stations, and collision information. This will help facilitate timely action to enforce the safety of school transportation services throughout the province.

#### MINISTRY OF TRANSPORTATION RESPONSE

The Ministry of Transportation recognizes that there are challenges to directly sharing all

inspection results, audits and other events with school boards and transportation consortia, since a single bus operator may serve multiple school boards or consortia and may also have vehicles unrelated to the transportation of children. Despite these challenges, the Ministry of Transportation is committed to working with the Ministry of Education, school boards and transportation consortia to improve information-sharing in this regard.

CVOR abstracts for all commercial vehicle operators, including school bus operators, that summarize a carrier's performance over a 24-month period are available to members of the public (including school boards and consortia) on the Ministry's website. A more detailed abstract is available only to carriers and contains details of the carrier's safety performance, with a chronological record of all events entered onto the carrier's record during the past five years. The new Registration and Licensing System of Ontario will include revisions to the layout and format of CVOR abstracts to make them easier to read and understand, and make it easier to assess a carrier's safety performance record.

The Ministry of Transportation encourages school boards and transportation consortia to request copies of these abstracts as part of their transportation contracts.

### 4.1.3 Student Safety

#### Consortia Set Their Own Safety Policies for Students and Bus Drivers

All three transportation consortia we visited provide their bus operators with their policies regarding the safe transport of students. These policies varied at each consortium and included things such as picking up students on the right side of the road and not having bus stops on high-traffic roads.

With regard to student behaviour on the buses, the three consortia have policies in place that delegate the responsibility of dealing with behavioural

issues to the principals of the schools they serve. They see the time students spend on a school bus as an extension of the school day. Bus drivers are to inform the principal of behavioural issues requiring the principal's attention, and it is then up to the principal to determine the appropriate course of action. In addition, only two of the consortia have a policy document, "Responsibilities of the Students," which outlines expectations of appropriate behaviour on the bus and warns that the privilege of being bused to school may be lost if a student acts in an unsafe or inappropriate manner. Only one consortium requires its schools to obtain a sign-off on this policy by the students and parents.

#### **Safety Information and Training for Students on School Buses Varies across the Province**

Each consortium decides whether or not it will offer school bus safety programs to its students, which programs it will offer and what information, if any, it will provide. The Ministry of Education has not mandated any training or information to be provided. We noted variations at the three consortia we visited, both in the information and programs offered to students and whether the programs were mandatory or voluntary. Specifically:

- Each consortium provided its own materials to schools to distribute to students on general bus safety (such as getting on and off the bus and how to behave on the bus) as well as information for parents of new riders on how to prepare them to ride the bus.
- Two consortia offered general school bus safety training for elementary students every year, although only one made it mandatory. In the consortium where it was up to individual schools to decide whether or not to take advantage of the training, only 12% of the students had taken school bus safety training.
- All three consortia offered a voluntary orientation program for new riders every year. Two of the three did not track the number of students that had taken the orientation; in the third consortium, only 30% of new riders had taken the orientation.

- School bus evacuation training conducted by the operator was mandatory every year in all three consortia. However, only one consortium received any assurance from the operator, listing schools and dates, that the training had actually taken place. The other two could not confirm to us when this training had taken place.

We noted in the responses to our survey that training offered to students and its uptake also varied in the other 30 consortia. Only 15 of the remaining 30 consortia had made general school bus safety training mandatory, and only five had mandatory orientation for new riders. Approximately half of the consortia where these training programs were voluntary tracked the uptake of the training. Uptake for general school bus safety training averaged about 60%, and orientation for new riders averaged about 45%.

#### **Protocol for Meeting Young Students at the Bus Stop Varies across the Province**

School boards and consortia have adopted a safety protocol that requires a parent or a designated adult to meet younger children at the bus stop after school. These young students have an identifier, usually on their backpack, and are to wait on the bus until their parent or other adult is located. In the consortia we visited and from a survey undertaken by the Ontario Association of School Business Officials, we found that the grades of students who must be met at the stop varied across the province, from kindergarten to Grade 3.

### **RECOMMENDATION 8**

To improve student transportation safety, the Ministry of Education, in conjunction with school boards and transportation consortia, should:

- develop consistent safety policies for the safe transport of students and for dealing with behavioural issues on the bus;
- identify or develop mandatory training programs and standard information packages



for students on school bus safety, and ensure that this training is delivered consistently to all students across the province; and

- determine which grades should be met at the bus stop by an adult, and develop a standardized process for this across the province.

#### MINISTRY OF EDUCATION RESPONSE

School boards are self-governing bodies and retain the right and responsibility to determine their own policies and procedures, including the development, approval and implementation of all transportation policies. The Ministry will, however, encourage and support the Ontario Association of School Business Officials Transportation subcommittee to address these issues at a provincial level.

### 4.1.4 Incidents and Collisions

The Ministry of Education (Ministry) funds student transportation through the school boards and summarizes the results of its annual student transportation survey from the information provided by the consortia. However, the Ministry takes a mostly hands-off approach when it comes to safety. For example, the Ministry has not set any guidelines on the reporting of collisions and incidents among the consortia to enable analysis of their causes, and to identify and compare best practices in order for this information to be used in developing strategies to prevent future collisions and incidents. The result is inconsistent tracking and analysis of collisions and incidents, and gaps in information by the consortia.

#### Consortia Need to Better Track and Analyze Collision Data

The three consortia we visited required their contracted bus operators to report to them on all collisions involving school vehicles. However, only two of the consortia tracked and analyzed this information to identify trends such as the cause of accidents or operators with a high number of accidents. Only one consortium used this information

to improve the safety of its contracted services, such as requiring contractors to provide specific training for drivers or making changes to existing routes.

Collision reporting also varied in the remaining 30 consortia. In our survey, we asked these consortia to provide us with the number of collisions involving school vehicles within their jurisdictions for the 2012/13 and 2013/14 school years and to specify those that resulted in a student fatality or injury, or in damage to property. Only 50% were able to provide us with more fulsome information for both school years.

#### Incidents Involving School Vehicles Are Not Tracked and Analyzed Consistently across the Province

The tracking of incidents is not consistent among the consortia. These include such occurrences as buses breaking down, not arriving at stops on time or dropping students off at the wrong stop, or student injuries on buses and student behaviour issues such as fighting (see **Appendix**).

We asked all 33 consortia for the number of such incidents involving school vehicles for the 2012/13 and 2013/14 school years. Three consortia were unable to provide us with statistics on any incidents, and a number of others were only able to provide us with statistics on late vehicles or mechanical breakdowns, stating that other incidents were not tracked. Only four of the 33 consortia that we either surveyed or visited were able to provide us with statistics on all the categories of incidents that we requested for both school years. **Figure 7** is a summary of the incidents that were recorded and reported to us for the 2012/13 and 2013/14 school years by the three consortia we visited and the 30 we surveyed that tracked such information.

### RECOMMENDATION 9

The Ministry of Education should set formal guidelines on the reporting of school vehicle collisions and incidents among the transportation consortia to enable comparison and analysis of their causes and facilitate the identification of issues and best practices of consortia for the

**Figure 7: Incidents on School Vehicles Broken Down by Type, 2012/13 and 2013/14**

Source of data: Survey of transportation consortia conducted by the Office of the Auditor General

Type of Incident	2012/13		2013/14	
	Number Reported*	% of Consortia that Provided Incidents Data	Number Reported*	% of Consortia that Provided Incidents Data
Student dropped off at wrong stop	44	30	43	42
Student not met by parent or guardian	294	39	2,883	61
Student lost	19	36	29	45
Bus late	27,203	58	44,771	70
Mechanical breakdown	5,141	48	8,085	70
Fights/bad behaviour	965	33	1,214	52
Other (eg., student injuries, medical emergency, boarded wrong bus, bullying)	976	30	866	45
<b>Total</b>	<b>34,642</b>		<b>57,891</b>	

\* The number reported is for only the consortia that provided incidents information to us. Appendix 1 identifies which consortia reported that they tracked incidents, and the types of incidents they tracked.

purpose of developing strategies to mitigate these in the future.

#### MINISTRY OF EDUCATION RESPONSE

The Ministry agrees to work with school boards and transportation consortia to develop standardized definitions, and expand the collection of school-vehicle collisions and incidents information through the annual student transportation survey.

## 4.2 Eligibility for Busing Varies Significantly across the Province

Each school board can make its own decisions about the transportation services it will provide and about which students are eligible for busing. This leads to significant differences in the level of transportation services provided and creates unequal access for students. Across the province, about 40% of students use school transportation. However, among school boards the percentage varies significantly, from 10% to 87%. While a significant portion of this disparity may be due to differences in geography, student population density and the availability of public transit, differing eligibility

**Figure 8: Range in Distances Between Home and School Set by Ontario School Boards for Students to be Eligible for School Transportation, 2013/2014**

Source of data: Ministry of Education, Student Transportation Survey for 2013/14

Grade	Distance (km)		
	Minimum	Maximum	Median
JK	0	1.6	0.8
SK	0	1.6	0.8
1	0.8	1.6	1.2
2	0.8	2.4	1.2
3	0.8	2.4	1.2
4	1.0	2.4	1.6
5	1.0	2.4	1.6
6	1.0	3.2	1.6
7	1.0	3.2	1.6
8	1.0	3.5	1.6
9-12	1.6	4.8	3.2

criteria for busing among boards also contribute to this variation.

Figure 8 shows that eligibility criteria, based on home-to-school walking distances, vary significantly by grade in school boards across the province. We noted that eligibility criteria for busing varied among consortia, among school boards in the same consortium and sometimes among schools

within the same school board. To illustrate, in the 2013/14 school year, 36% of consortia had school boards with different eligibility criteria, and 15% of school boards had schools with different eligibility criteria. In addition, we noted that three school boards in the province did not provide any bus transportation to their secondary students (Grades 9 to 12), except for students with special needs. Included in this group was one of the school boards we visited, which told us its policy was due to a lack of funding.

We were also informed by the boards we visited that public and Catholic boards serving the same area tend to compete for students in order to increase the per pupil funding they receive from the Ministry of Education, and busing is one of the means that the boards use to attract students.

We researched other jurisdictions in Canada and found that four provinces had standardized their eligibility criteria. Manitoba sets the walking distance for eligibility at 1.6 kilometres, Alberta and New Brunswick set it at 2.4 kilometres, and Nova Scotia sets it at 3.6 kilometres for students in all grades.

### RECOMMENDATION 10

The Ministry of Education, in conjunction with school boards, should set standards on eligibility for transportation services, especially home-to-school walking distances for students, to promote greater consistency in transportation services across school boards within the province.

### MINISTRY OF EDUCATION RESPONSE

The Ministry will explore the impacts of this recommendation on funding at a provincial level and take the recommendation into consideration accordingly.

## 4.3 Funding Formula Needs Updating

### 4.3.1 Funding for Transportation Services Is Not Based on Need

Funding for school transportation in each board is not based on need, such as how dispersed students and schools are, and the number of students with special needs. Instead, it is based on a historical amount—each board's 1997 spending level with some annual adjustments for enrolment and inflation, and other minor adjustments (such as for fuel costs and safety initiatives). Generally, a school board is informed of its funding and then sets priorities and makes decisions about transportation service to be provided accordingly. We noted the following concerns with respect to the province's current method of funding school transportation services:

- Transportation grants to school boards do not have to be spent on transportation. There are no minimum eligibility or service requirements designed to provide a basic or core level of service, and boards can determine which services they want to provide and spend their funding on. We found that school boards were spending close to, or even more than, the grant received on transportation services, but making choices that have resulted in significant differences in service levels across the province. For example, at one consortium we visited, we noted that a school board had recently decreased its walking distance for service eligibility for specific grades because it had excess funding. At another consortium, one school board began offering transportation services to its French Immersion students when it had a surplus of funds, while another board within the same consortium did not provide these services.
- There is a risk that the Ministry is funding deficits for transportation services resulting from some boards' overly generous eligibility policies. Since 2006, the Ministry has

contracted with a consulting firm to conduct effectiveness and efficiency reviews of school transportation services. Depending on a consortium's overall rating (high, moderate-high, moderate, moderate-low, low), the Ministry would fund all, part or none of the transportation services deficit of a board within the consortium. Specifically, if the overall rating for a consortium is "moderate" or above, the Ministry will cover 60–100% of any shortfall in funding. Below a "moderate" rating the Ministry will not cover any of the shortfall. At the time of our audit, 25 of the 33 consortia had a rating of "moderate" or above. Deficits totalling over \$40 million have been funded since the reviews were initiated. Without province-wide ministry guidelines on student eligibility, the deficit funded by the Ministry could be the result of a board's overly generous eligibility policies—which the review does not consider.

- Not all factors that significantly influence a school board's transportation costs are reflected in the Ministry's funding formula. Although some of the adjustments to the funding model over the years have been due to increases in enrolment, this is not the primary factor influencing a board's transportation costs or needs. We were informed by the consortia we visited that decreasing enrolment can actually increase transportation costs, because if a school closes, students must be transported farther to attend the next closest school. More important influences on transportation needs that are not taken into account in the Ministry's current funding formula are local factors such as enrolment density, geography, the availability of public transit, the number of students with special needs, and hazards such as busy streets or highways.
- Over the last 10 years, the Ministry of Education has provided targeted funding for specific initiatives such as safety programs and wage

enhancements for school bus drivers, but has not verified that the funds were spent for the intended purpose. The Ministry told us that it communicated its expectation to school boards on how these funds were to be used, but it does not have any reporting mechanisms with school boards to verify that the funds were actually spent as intended.

In 2004, the Ministry began testing a new funding formula based on need that would have resulted in some boards receiving less and others more. However, due to significant pushback, especially from the boards that expected to get less, the Ministry abandoned the new funding model and continued with the status quo.

#### 4.3.2 Savings from Forming Consortia Have Not Been Measured

School boards formed consortia to deliver transportation services as part of the reforms the Ministry introduced in the 2006/07 school year. Although these reforms were aimed at achieving cost efficiencies and savings, the Ministry did not set any benchmarks with regard to the efficiencies or savings school boards should achieve. It has not undertaken an analysis since the consortia began operating. Only one of the three consortia we visited had tracked whether there was a change in the number of buses its boards use; and in this case there was a decrease. None of the consortia we visited had information on its boards' transportation costs before the consortium's formation to determine whether any savings were achieved. However, from 2006/07 to 2013/14, both the funding provided and school board expenditures on transportation have increased by about 4% after being adjusted for inflation, while the number of students transported has remained stable.

#### RECOMMENDATION 11

After implementing standardized eligibility criteria, we recommend that the Ministry of Education (Ministry) should:

- revisit its current funding formula. The formula needs to reflect school boards' local transportation needs based on the number of eligible riders and consortia utilization of buses, and taking into consideration factors such as geography, availability of public transit and the number of students needing transportation services (due to distance, special needs, special programs or road hazards); and
- implement an updated funding formula ensuring that any targeted funding for specific initiatives is spent for the purposes intended.

The Ministry will continue to examine the current funding formula in relation to the changing local transportation needs of school boards. The Ministry has been implementing student transportation reforms (for example, creation of consortia, and effectiveness and efficiency reviews) to increase the efficiency and effectiveness of transportation service delivery. Through the effectiveness and efficiency reviews, appropriate adjustments have been made to transportation funding.

## 4.4 Opportunities Exist for Efficiency Gains

Based on the results of the Ministry of Education's 2013/14 student transportation survey, the average cost to transport a student without special needs was \$740, with a range between boards of \$365 to \$1,680. The average cost to transport a special needs student was \$4,650, with a range between boards of \$1,045 to \$11,205. A significant portion of this disparity could be due to differences in geography, student population density and other local factors or differences in eligibility criteria. However, the Ministry has not followed up with the boards to determine if such significant variances

in costs per student are due to these reasons or to inefficiencies in providing transportation services.

There are several initiatives that consortia could undertake to further maximize the occupancy on vehicle runs in order to reduce costs. These include collecting and using accurate student information and information on actual ridership to plan services; fully utilizing route planning software; staggering bell times; sharing routes between boards; and instituting common days off between boards. Our audit noted that these initiatives have been implemented to varying degrees in the consortia that we visited, but more opportunities may exist. The following subsections discuss this in greater detail.

### 4.4.1 The Right Information Is Not Always Used in Planning Student Transportation Services

Consortia usually determine the number of buses needed using the number of students who are eligible for transportation rather than the actual number of students riding the buses. Many students may be eligible for busing but for one reason or another may not be using the service on a regular basis. For example, at one consortium where the drivers performed a head count of riders for three consecutive days, only about 70% of the students that it had planned would use school transportation were actually using the service. Often, parents of eligible students do not inform the consortia that they do not need school transportation, either because they do not know they should notify the consortia or because they want to keep a place open in case they need it periodically.

Two of the three consortia we visited did not have good procedures to identify the actual number of eligible students who were riding the buses. However, the third consortium undertook a rigorous process over the summer months to identify which eligible students required transportation services. This consortium used radio ads, pamphlets and robocalls to inform parents that they needed to notify the consortium by late summer whether they

planned to use school bus services. In cases where the parents failed to contact the consortium and the consortium was unable to contact the parents, the child would be removed from the bus service for the first two weeks of school, and then indefinitely. This consortium was able to confirm with the majority of its eligible students whether or not they needed the service, and it planned the busing accordingly. It also required students to use the bus a minimum two days per week. We found that about 90% of the students whom this consortium had made arrangements to transport were actually using the service.

Also, all three consortia we visited were to varying degrees not utilizing the most up-to-date information on students (such as students changing addresses, changing schools or leaving the board) when arranging busing services. For example, when one consortium compared its information on students twice during the year to information the boards had, it found that about 400 students for whom it had arranged busing in the 2014/15 school year did not need the service because they had moved, changed schools or left the board completely.

#### **4.4.2 Route Planning Software Is Not Consistently Used by Consortia**

According to the survey we conducted, 40% of the consortia were not using the route optimization function in the route planning software. The route optimization function can serve as a useful starting point in mapping the most efficient routes, even though the suggested routes may have to be manually adjusted based on knowledge of the local area (for example, construction or traffic volume).

At the consortia we visited, we found that the route optimization function in the software was not being used for special needs students. One of the three consortia we visited used the function annually to assist in optimizing all of its routes for non-special needs students, and one used it for only some routes. The third consortium did not use the function for route planning purposes, but used it

every four years to determine cost sharing between boards. For the most part, this consortium carried forward its routes from year to year until it became aware of problems (such as overcrowding on buses and unneeded stops) from either the driver or the school.

#### **4.4.3 More Sharing of Buses Is Required**

Boards within some consortia are sharing buses but improvement is needed. In our 2000 audit of pupil transportation grants we recommended that school boards serving the same area integrate their transportation services. We noted that, although buses are being shared to a certain extent, students from different boards seldom ride together on the same bus. Based on the ministry survey results for 2013/14, 36% of consortia reported that their boards were sharing buses for at least half of the routes. However, only 18% of consortia indicated that students from different boards rode together on the bus for at least half the trips the buses made.

We also noted that the French boards operating in the same area were not part of two of the three consortia we visited. The third consortium served all the boards in its area. A recent study commissioned by the Ministry indicated that \$1.7 million could be saved annually by having a French board join an existing consortium.

#### **4.4.4 School Start and End Times Are Not Always Staggered**

School start and end times are not always staggered to let buses make more than one trip in both mornings and afternoons. By staggering school start and end times, consortia can reduce the number of buses needed. One consortium we visited increased the efficiency of its service by deciding the start times for schools in its area, while another regularly suggested start and end times that were normally accepted by the schools. However, in the area served by the third consortium, the school boards decided their start and end times; nearly 70% of

the schools' start times and almost 60% of the end times were bunched within 30 minutes, significantly limiting the consortium's ability to have the same buses make multiple trips.

#### 4.4.5 School Boards Are Not Fully Co-ordinating Common Days Off

A fairly simple way to reduce the need for school transportation is for boards within a consortium to co-ordinate professional activity days and school holidays, and to also have common school year start and end dates. In response to our survey, 40% of the consortia indicated that boards within their area had common days off at the elementary and secondary school level. Similarly, the school boards within two of the consortia we visited were not co-ordinating all their days off for elementary schools and secondary schools, while the third consortium had fully co-ordinated days off. For the consortia where the days off were not coordinated, one consortia estimated savings of \$525,000 for three days that were not co-ordinated between its school boards, while the other could not estimate the savings. We estimated the savings could be up to \$370,000 per day, which represents the consortia's daily operating costs for student transportation.

#### 4.4.6 Bus Utilization Rates Are Not Being Captured

Both the seating capacity and the utilization rate (number of students riding as a percentage of seating capacity) of buses are determined differently by consortia, as there is no provincial standard for either one. Although the Ministry does not collect information on the utilization rates of buses across the province, we requested this information as part of our survey and noted that the rates reported by consortia ranged from 50% to 230%.

These statistics are not reliable, primarily for three reasons. First, as noted earlier, consortia generally did not have very good information on the actual number of students riding their buses.

Second, seating capacity depends on the age and size of students who will be on the bus. Because each consortium sets its own capacity, we noted variations at the consortia visited (for example, one consortium assigned a maximum of 46 secondary students to a large bus while another assigned 55). And third, consortia used different methods to calculate the utilization rate, comparing either the average number of students transported for each trip or the total number of students transported for all trips to the seating capacity.

The lack of any provincial guidelines or reporting of bus utilization rates makes it difficult to compare consortia across the province, in order to see where improvements are needed and to link utilization to the funding for student transportation.

#### 4.4.7 Consortia Are Contracting for More School Bus Service Than Actually Needed

The consortia we visited negotiated different payment structures in their bus contracts. One consortium's payment structure was based on the amount of time buses were used; the other two based theirs on a combination of time and kilometres travelled.

We reviewed the actual use of the buses at the three consortia and found that although one had negotiated a base rate strictly based on time (three hours a day), all of its large buses, which comprised about a quarter of the consortium's fleet, were being used for less than the contracted hours. In fact, it used about two-thirds of its larger buses for two hours or less each day. Similarly, another consortium was contracting buses based on time and distance travelled, and one-third of its buses were significantly underutilized based on the contracted hours. If these consortia contracted fewer buses and used them on additional runs they could save money.

### RECOMMENDATION 12

In order to increase the efficiency of school transportation services and in turn decrease costs, transportation consortia should:

- track and monitor utilization by using the most relevant and accurate information available in planning student transportation services, including actual ridership;
- evaluate the benefits of parents of students who are eligible to use school board–provided transportation services being required to opt in or out of using transportation services;
- use route optimization software where feasible as a starting point in mapping the most efficient routes to transport students;
- increase sharing of school buses among boards and transporting students from different boards on the same bus;
- stagger school start and end times where possible to reduce the number of buses needed, by allowing them to be used on more than one run;
- reduce the need for transportation services by co-ordinating common days off; and
- only contract for services that are required.

#### TRANSPORTATION CONSORTIA RESPONSE

All three consortia were in agreement with this recommendation. The consortia stated that successful implementation would best be achieved through the Ontario Association of School Business Officials Transportation subcommittee. This would allow for input and discussion by all consortia to identify best practices in delivering transportation services more efficiently (such as, increased sharing of school buses between boards and students from different boards, co-ordinating common days off, utilizing route optimization software more fully, staggering school start and end times, contracting only for services needed based on actual ridership) and enable the development of uniform processes and practices across the province.

#### RECOMMENDATION 13

The Ministry of Education should set standards for the optimal utilization of school vehicles for school boards and transportation consortia, and provide guidance to them in calculating utilization rates.

#### MINISTRY OF EDUCATION RESPONSE

The Ministry will encourage and support the Ontario Association of School Business Officials Transportation subcommittee to address this issue at a provincial level, taking into consideration that the utilization of school vehicles and determination of an acceptable range of utilization rates must recognize the diversity of school boards across the province.

#### 4.4.8 Better Co-ordination and Integration of Student Transportation Services Needed

From our audit work, we noted that the ability of a consortium to efficiently and effectively manage transportation services depends on the level of authority delegated to it by the school boards it serves, and the willingness of school boards to work co-operatively and integrate services and policies to serve the common interests of all the boards in the consortium (such as harmonizing eligibility criteria, sharing bus routes and having common days off)—as opposed to the particular interests of the individual boards. Specifically, consortia with the authority to establish eligibility criteria and employ efficiency measures uniformly across their entire service area were more likely to employ best practices to their fullest potential.

The Ministry of Education has also recognized this, and in its effectiveness and efficiency reviews provides higher ratings to a consortium that has, for example, a well-defined governance and organizational structure with clear roles and responsibilities, and an oversight committee that focuses only on high-level decisions. This structure helps ensure that a consortium's mandate remains consistent



despite changes in board members and trustees. The Ministry does not specify a governance and organizational structure. However, the consortia that receive high ratings in their effectiveness and efficiency reviews are normally incorporated as separate legal entities (although three unincorporated consortia have also received a high overall rating).

Two of the consortia we visited each operated as a cohesive unit that made decisions for the good of the consortium and all the boards it serves, while the third consortium generally operated in a manner that looked at the best interests of each board individually. A 2011 effectiveness and efficiency review commissioned by the Ministry stated that the member boards of this third consortium continued to maintain involvement in student transportation services to the extent that each board still set its own transportation policies and managed parents' and principals' requests for exceptions to policies. We noted that these practices still existed at the time of our audit. Furthermore, eligibility criteria were not harmonized between the boards it served and many inefficient practices previously noted in this section were present to a greater degree. The review went on to note that for the governance committee to play a meaningful role in the oversight of the consortium, it needed to have an appropriate delegation of authority from member boards, and that the boards and consortium should further define their roles and delegated authority.

#### RECOMMENDATION 14

The Ministry of Education should clarify the roles and responsibilities of school boards and consortia in setting eligibility and employing efficiency measures.

#### MINISTRY OF EDUCATION RESPONSE

The Ministry has actively reinforced and encouraged best business practices since 2006 through the effectiveness and efficiency reviews. School boards are self-governing bodies and are responsible for making their own decisions.

## 4.5 Procurement of Student Transportation Services Needs Improvement

### 4.5.1 Only Half of Consortia Acquired Student Transportation Services through a Competitive Procurement Process

The *Broader Public Sector (BPS) Accountability Act, 2010* and its related directive require all broader public sector organizations receiving \$10 million or more in government funding to use competitive procurement for contracts greater than \$100,000. Given the level of funding they receive for student transportation, all school boards are subject to this requirement. The effectiveness and efficiency reviews commissioned by the Ministry of Education also previously identified the need for all school boards to transition to a competitive procurement process for transportation services.

In April 2011 the government issued the BPS procurement directive, which required broader public sector entities to acquire publicly funded goods and services through a competitive process that is fair, open and transparent. At the time the directive was issued, about 30% of consortia were competitively procuring their school bus transportation services, while about 70% were acquiring these services by negotiating prices with their existing bus operators. Many of the operators that were negotiating prices were strongly opposed to participating in a competitive procurement process, and in response the government gave school boards a six-month voluntary exemption (until December 31, 2011) from competitive procurement for transportation services. At the same time, the Ministry of Education launched a task force (composed of representatives from the Ministry, school boards, transportation consortia and bus associations, as well as a procurement adviser) whose mandate was to review processes used to procure student transportation, paying specific attention to their openness, fairness, accountability and value for money. The task force did not deliver on its mandate, and in March 2012 the Ministry instructed all school

boards to move forward with competitive procurement. Several operators, concerned with the impact that competitive procurement would have on their business, decided to take the school boards and the Ministry to court. At the time of our audit, these court challenges were still pending. By 2013/14 only about 50% of the transportation consortia in the province had competitively procured the transportation services they were using at that time.

In October 2014, the Education Minister announced an independent review to explore options other than requests for proposals (RFPs) for competitive procurement of student transportation services that would still be in compliance with the BPS procurement directive. At the time of our audit, the review had been completed but a report had not yet been finalized and issued.

#### 4.5.2 Evaluation of Contractors Is Not Consistent among Consortia

Two of the three consortia we visited followed a competitive procurement process in 2009 and 2013, respectively, for acquiring current student transportation services from school bus operators. The third consortium last selected its operators competitively in 2006, and since August 2014 has been granting them one-year extensions while awaiting the outcome of the cases before the courts.

We reviewed the latest RFP issued by each of the three consortia to acquire transportation services, and noted that two of the three consortia weighted qualitative criteria (several of which pertain to safety) at 65% and criteria related to price at 35%. One of these two consortia required a minimum score on quality to move on to the pricing stage. This weighting of quality against price is in line with information we received from the Ministry of Government and Consumer Services, Supply Chain Ontario, which informed us that the split between quality and price scoring for the acquisition of services is generally about 60%–70% for the quality component and 30%–40% for pricing.

The third consortium reviewed qualitative factors, but based the selection of its bus operators on price alone, allowing all bidders who submitted complete proposals to progress to the price comparison stage irrespective of their qualitative scores. We noted that two bidders with the lowest qualitative scores, who were providing services to the consortium at the time of the competition, were awarded new contracts even though two other bidders had considerably higher qualitative scores.

The qualitative criteria used to evaluate proposals differed in all three RFPs. For example, in the area of student safety programs, one consortium allocated points for having general safety programs in place; another allocated points for having evacuation training programs; while the third did not allocate any points for student safety. We grouped like criteria based on the key factors for transporting students safely and identified the weightings assigned by each of the consortia, as shown in **Figure 9**. We would have expected all three consortia to allocate high marks to the criteria related to safety—such as driver training, the operators' CVOR and accident history, fleet maintenance and management, and student safety programs offered. However, the weighting of these criteria varied significantly among the three consortia that we visited, ranging from a high of 65% to a low of 26% of the total qualitative score.

In December 2008, the Ministry of Education released a resource package including procurement guidelines, an RFP template for the procurement of bus operators and a contract template, but made its use by the boards optional. The RFP template suggested criteria for evaluating the operators on the quality of their services. Many of these qualitative criteria spoke to safety, and the template also included suggested weightings for the criteria. However, the template did not indicate what portion of the score should be assigned to quality as opposed to price, nor did it recommend a minimum score for qualitative criteria that successful competitors had to attain.

**Figure 9: Weighting of the Qualitative Criteria (Safety and Other) Used to Evaluate School Bus Operator Proposals**

Source of data: Consortium Request-for-proposals submissions

	% Assigned for Qualitative Criteria		
	Consortium 1	Consortium 2	Consortium 3
Driver education, safety and retention	5	25	20
Accident and CVOR history	5	15	5
Fleet maintenance and management	11	10	30
Student safety programs	5	0	10
<b>Subtotal 1—Safety</b>	<b>26</b>	<b>50</b>	<b>65</b>
Administration	21	45	30
Other	53	5	5
<b>Subtotal 2—Other</b>	<b>74</b>	<b>50</b>	<b>35</b>
<b>Total</b>	<b>100</b>	<b>100</b>	<b>100</b>

**RECOMMENDATION 15**

The Ministry of Education, in conjunction with the school boards and transportation consortia, should develop standard criteria for evaluating the submissions of school bus operators in procuring student transportation services. The criteria should appropriately consider the operators' ability to safely transport students.

**MINISTRY OF EDUCATION RESPONSE**

Student safety is our priority. The Ministry agrees to support school boards and consortia in reviewing this recommendation.

## Appendix—Types of Incidents Tracked by Transportation Consortia, 2012/13 and 2013/14

Source of data: Survey of transportation consortia conducted by the Office of the Auditor General except where otherwise indicated

Consortium	Student Dropped Off at Wrong Stop		Student Not Met by Parent		Student Lost		Bus Late		Mechanical Breakdown		Fights/Bad Behaviour		Other (e.g., Student Injuries, Med. Emergency, Boarded Wrong Bus, Bullying)	
	2012/13	2013/14	2012/13	2013/14	2012/13	2013/14	2012/13	2013/14	2012/13	2013/14	2012/13	2013/14	2012/13	2013/14
1 Algoma & Huron-Superior Transportation Services									✓					
2 Chatham-Kent Lambton Administrative School Services											✓	✓	✓	✓
3 Consortium de transport scolaire de l'Est														
4 Consortium de transport scolaire d'Ottawa					✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
5 Durham Student Transportation Services	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
6 East of Thunder Bay Transportation Consortium	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
7 Halton Student Transportation Services	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
8 Hamilton-Wentworth Student Transportation Services	✓	✓	✓	✓							✓	✓	✓	✓
9 Huron-Perth Student Transportation Services	✓	✓			✓	✓							✓	✓
10 Niagara Student Transportation Services	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
11 Nipissing-Parry Sound Student Transportation Services	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
12 North East Tri-Board Student Transportation														
13 Northwestern Ontario Student Services Consortium	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
14 Ottawa Student Transportation Authority														
15 Rainy River District Transportation Services	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
16 Renfrew County Joint Transportation Consortium			✓	✓										

Consortium	Student Dropped Off at Wrong Stop		Student Not Met by Parent		Student Lost		Bus Late		Mechanical Breakdown		Fights/Bad Behaviour		Other (e.g., Student Injuries, Med. Emergency, Boarded Wrong Bus, Bullying)	
	2012/13	2013/14	2012/13	2013/14	2012/13	2013/14	2012/13	2013/14	2012/13	2013/14	2012/13	2013/14	2012/13	2013/14
17 Service de transport Francobus							✓	✓	✓	✓				
18 Simcoe County Student Transportation Consortium			✓	✓	✓	✓	✓	✓					✓	✓
19 Southwestern Ontario Student Transportation Services			✓	✓										
20 Student Transportation of Eastern Ontario			✓	✓					✓	✓	✓		✓	✓
21 Student Transportation of Peel Region*					✓	✓	✓	✓	✓	✓				
22 Student Transportation Service Consortium of Grey Bruce							✓	✓	✓	✓	✓		✓	✓
23 Student Transportation Services of Brant Haldimand Norfolk							✓	✓						
24 Student Transportation Services of Central Ontario	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
25 Student Transportation Services of Thunder Bay	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓				
26 Student Transportation Services of Waterloo Region Inc.		✓	✓	✓			✓	✓	✓	✓	✓	✓	✓	✓
27 Student Transportation Services of York Region	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓				
28 Sudbury Student Services Consortium*			✓	✓	✓	✓	✓	✓	✓	✓			✓	✓
29 Toronto Transportation Group*			✓	✓	✓	✓	✓	✓	✓	✓				
30 Tri-Board Student Transportation Services							✓	✓	✓	✓				
31 Trillium Lakelands District School Board							✓	✓	✓	✓	✓	✓	✓	✓
32 Wellington-Dufferin Student Transportation Services			✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
33 Windsor-Essex Student Transportation Services	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
<b>Total # of consortia reporting they tracked the incident type</b>	10	14	13	20	12	15	19	23	16	23	11	17	10	15
<b>% of total consortia</b>	30	42	39	61	36	45	58	70	48	70	33	52	30	45

\* Data obtained from visits to the consortium.

## Appendix 5

### **Sample role for a Municipal Education Liaison Person and sample mandate of a Municipal Education Committee**

#### **Municipal Education Liaison Person**

Purpose of the Role: to allocate human resources to build database information for effective advocacy of municipal council on educational matters with local school boards; to act as a municipal liaison person with students, parents, residents, businesses, service groups, council committees and school boards in receiving feedback and coordinating consultation and meetings.

Candidate profile: a fluently bilingual person familiar with the education sector and knowledge of school board practices and policy; attention to detail, collaborative, resourceful, excellent communication skills

#### Sample job description

- work in tandem with the Social Development Council of Cornwall in establishing a Youth Advisory Committee for Cornwall and one for SDG County
- take proactive steps to schedule consultation meetings with all four school boards in the fall and spring of each year to present database information
- recruit potential candidates to run as trustees as part of the Education Committee's mandate and build a succession plan;
- invite student trustees to these meetings
- Increase student engagement in municipal education initiatives and opportunities (tourism, information technology, surveys, conservation, volunteering, hosting)
- Increase child care capacity at every school and identify unused space for education professionals to offer services (speech language pathology, occupational therapy, ABA therapy for students with autism)
- Work with economic development staff to attract more professional practices and education related professionals to SDG communities (occupational therapists, physiotherapists, speech language therapists, doctors, dentists, orthodontists, optometrists, tutoring services, autism therapy service providers, child care providers) and for use of space in elementary schools
- Attend meetings of each school board and review meeting minutes to keep municipal committees apprised of school board initiatives and pending changes/decisions/consultations
- Organize delegations to school board meetings
- Keep residents and parents informed of school board decisions of importance
- Support the work of the Education Committee
- Solicit businesses to offer students with co-op opportunities
- work with volunteers and service groups to enhance educational opportunities
- create new educational opportunities (video projects celebrating rural schools)
- help promote and recruit families to host international students

## **Municipal Education Committee**

Purpose of the Committee: Since trustees are inaccessible to parents, municipal councillors have to become the lead representatives of the parent voice before school boards as elected officials reflecting the needs of their constituents; as a progressive municipal government become a precedent setting example of municipal commitment to local education issues.

### Sample action items the Committee would undertake:

- Engage in active advocacy (writing submissions to school boards), delegations to meetings to reverse 2016 school closing decisions, bell time changes etc.
  - Demand that each school board strike a Rural Education Task Force as a multi-board endeavour modelled on the work of the Thames Valley DSB task force working with the Community Schools Alliance (CSA); the rural task force works within school boards and the Education committee works as an external task force in the community)
  - Align and share advocacy efforts with the CSA regarding political advocacy with the Ministry of Education
  - Place evidence of the work of the committee online and publish submissions to school boards for parents and the public to view
  - Allow parents, students and residents participation on the Committee
  - Review data being collected in the advocacy database by the Education Liaison person
  - Hire a part-time Education Liaison person to SDG Council until the position evolves to fulltime based on possible other funding sources to support the position s
  - Draft policies to support educational and learning initiatives within the counties
  - Draft policies for school boards to review
  - Help draft the Rural Education Strategy with CSA to present to the Ministry of Education
  - Schedule two meetings per year with school board planning staff (October and March prior to reporting deadlines for school boards to the Ministry of Education (October 31 & March 31)
  - Create /support a youth advisory committee or council for Cornwall and one for the counties of SDG where participant students have voting rights
  - Build on the assumption that communities have the expertise to inform the Ministry and not accept centralized decision- making regarding school closures
  - Consider an associate membership to Canadian Parents for French Ontario
- 
- Draft a municipal advocacy plan for education and improving rural schools
  - Provide Impact Assessments of closing schools in communities (repurposed St. Bernard School in Finch village by the South Nation Conservation Authority
  - Review school closures in every generation of parents (2006,2009) (2016-17)
  - Model duty of care and service to the community as publicly elected officials with transparent communication and publication of initiatives
  - Demand that the Ministry of Education conduct bias reviews in education
  - Liaise with the Office of the Auditor General of Ontario and Office of the Ombudsman
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**Date of Issue:** April 22, 2013**Effective:** Until revoked or modified**Subject:** DEVELOPING AND IMPLEMENTING EQUITY AND  
INCLUSIVE EDUCATION POLICIES IN ONTARIO SCHOOLS**Application:** Directors of Education  
Secretary-Treasurers of School Authorities  
Superintendents  
Principals of Elementary Schools  
Principals of Secondary Schools  
Principals of Provincial and Demonstration Schools**Reference:** This memorandum replaces Policy/Program Memorandum No. 119, “Developing and Implementing Equity and Inclusive Education Policies in Ontario Schools”, June 24, 2009.

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## INTRODUCTION

Ontario’s publicly funded education system supports and reflects the democratic values of fairness, equity, and respect for all. Recognizing the importance of education, the Ontario government has established three core priorities:

- high levels of student achievement
- reduced gaps in student achievement
- increased public confidence in publicly funded education

An equitable, inclusive education system is fundamental to achieving these core priorities, and is recognized internationally as critical to delivering a high-quality education for all learners. “Equity and excellence go hand in hand. ... In a truly equitable system, factors such as race, gender, and socio-economic status do not prevent students from achieving ambitious outcomes. Our experience shows that barriers can be removed when all education partners create the conditions needed for success.”<sup>1</sup>

Providing a high-quality education for all is a key means of fostering social cohesion based on an inclusive society where diversity is affirmed within a framework of common values that promote the well-being of all citizens. Ontarians share a belief in the need to develop students’ character and to prepare students for their role in society as engaged, productive, and responsible citizens. Active and engaged citizens are aware of their rights, but more importantly, they accept responsibility for protecting their rights and the rights of others.

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1. Ministry of Education, Ontario, *Reach Every Student: Energizing Ontario Education* (Toronto: Ministry of Education, Ontario, 2008), p. 8.



On April 6, 2009, the Minister of Education released *Realizing the Promise of Diversity: Ontario's Equity and Inclusive Education Strategy* (hereafter referred to as “the strategy”). This document sets out a vision for an equitable and inclusive education system. The action plan contained in the document focuses on respecting diversity, promoting inclusive education, and identifying and eliminating discriminatory biases, systemic barriers, and power dynamics that limit students' learning, growth, and contribution to society. These barriers and biases, whether overt or subtle, intentional or unintentional, need to be identified and addressed.

The purpose of this memorandum is to provide direction to school boards<sup>2</sup> on the review, development, implementation, and monitoring of equity and inclusive education policies to support student achievement and well-being. Our schools need to help students develop into highly skilled, knowledgeable, and caring citizens who can contribute to both a strong economy and a cohesive society.

## BACKGROUND

The ministry has issued several policy/program memoranda to support equity, student achievement, and positive school climates, including Policy/Program Memorandum No. 119, “Development and Implementation of School Board Policies on Antiracism and Ethnocultural Equity”, July 13, 1993.<sup>3</sup> When No. 119 (1993) was issued, many boards focused on creating learning environments that respected the cultures of all students. The antiracism and ethnocultural policies contained in No. 119 (1993) went “beyond a broad focus on multiculturalism and race relations”<sup>4</sup> to focus on identifying and changing institutional policies and procedures, as well as individual behaviours and practices that may be racist in their impact. No. 119 (1993) sought to equip students with the knowledge, skills, and attitudes to live in an increasingly diverse world, appreciate diversity, and reject discriminatory behaviours and attitudes. Several boards have expanded these antiracism and ethnocultural policies into more inclusive equity policies that address a broader range of discriminatory factors.

In addition, it is now recognized that such factors as race, sexual orientation, physical or mental disability, gender, and class can intersect to create additional barriers for some students. Many organizations, including the United Nations, are recognizing the compounding impact of such intersections on discrimination. Ministry and board policies, therefore, should also take intersecting factors into account.

Although much has been done – and continues to be done – to build the publicly funded education system's capacity to foster equity and inclusiveness in boards and schools, evidence indicates that some

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2. In this memorandum, *school board(s)* and *board(s)* refer to district school boards and school authorities.

3. Others include Policy/Program Memoranda No. 108, “Opening or Closing Exercises in Public Elementary and Secondary Schools”, January 12, 1989; No. 127, “The Secondary School Literacy Graduation Requirement”, October 13, 2004; No. 128, “The Provincial Code of Conduct and School Board Codes of Conduct”, December 5, 2012; No. 144, “Bullying Prevention and Intervention”, December 5, 2012; and No. 145, “Progressive Discipline and Promoting Positive Student Behaviour”, December 5, 2012. Sections 27–29 (“Religion in Schools”) of Regulation 298 replaced No. 112, “Education about Religion in the Public Elementary and Secondary Schools”, December 6, 1990.

4. Ministry of Education, Ontario, *Antiracism and Ethnocultural Equity in School Boards: Guidelines for Policy Development and Implementation* (Toronto: Ministry of Education, Ontario, 1993), p. 7.

groups of students continue to encounter discriminatory barriers to learning. Recent research shows that students who feel connected to teachers, to other students, and to the school itself do better academically.<sup>5</sup>

Policy/Program Memorandum No. 119 (2009) broadened the scope of No. 119 (1993) to take into account a wide range of equity factors, as well as all of the prohibited grounds of discrimination under the Ontario Human Rights Code and other similar considerations. No. 119 (2009) fully supported and expanded on the principles of antiracism and ethnocultural equity that were outlined in No. 119 (1993), and did not reflect a weakened or reduced commitment to antiracism or ethnocultural equity. By promoting a system-wide approach to identifying and removing discriminatory biases and systemic barriers, it has helped to ensure that all students feel welcomed and accepted in school life.

This memorandum brings No. 119 (2009) up to date so that it is in accordance with amendments to the Education Act; that is, school boards are now required to develop and implement an equity and inclusive education policy. This memorandum also updates No. 119 (2009) to reflect the fact that gender identity and gender expression are dimensions of diversity under the Ontario Human Rights Code.

## REQUIREMENTS FOR BOARDS

All publicly funded school boards are required to develop, implement, and monitor an equity and inclusive education policy that includes a religious accommodation guideline, in accordance with the requirements set out in this memorandum and the strategy, and that complies with relevant legislation, including amendments to the Education Act.<sup>6</sup>

The strategy is designed to promote fundamental human rights as described in the Ontario Human Rights Code and the Canadian Charter of Rights and Freedoms, with which school boards are already required to comply, subject to subsection 93(1) of the Constitution Act, 1867, and section 23 of the Canadian Charter of Rights and Freedoms. Boards must comply with all other aspects of the Education Act and regulations made under the act, including Ontario Regulation 181/98, which pertains to students with special education needs.<sup>7</sup> Boards must also comply with the Municipal Freedom of Information and Protection of Privacy Act, the Ontarians with Disabilities Act (2001), and the Accessibility for Ontarians with Disabilities Act (2005), as applicable. Other relevant legislation, such as the Youth Criminal Justice Act, must be referenced where appropriate. In addition, boards should refer to *English Language Learners / ESL and ELD Programs and Services: Policies and Procedures for Ontario Elementary and Secondary Schools, Kindergarten to Grade 12, 2007*; *Ontario's Aménagement linguistique Policy for French-Language Education, 2005*;<sup>8</sup> and *Ontario First Nation, Métis, and Inuit Education Policy*

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5. D. Goleman, *Social Intelligence: The New Science of Human Relationships* (New York, NY: Bantam, 2006).

6. Paragraph 8(1)(29.1) of the Education Act gives the Minister of Education the authority to require all school boards to develop and implement an equity and inclusive education policy, and, if required by the Minister, to submit the policy to the Minister and implement changes to the policy as directed by the Minister.

7. Ontario Regulation 181/98, "Identification and Placement of Exceptional Pupils", requires school boards to consider placement of students with special education needs into regular classrooms before considering alternative placements.

8. Boards should also refer to Policy/Program Memorandum No. 148, "Policies Governing Admission to French-Language Schools in Ontario", April 22, 2009; and *L'admission, l'accueil et l'accompagnement des élèves dans les écoles de langue française de l'Ontario – Énoncé de politique et directives, 2009*.

*Framework, 2007*. They should also consult with their legal counsel and Freedom of Information coordinators to ensure that they are fulfilling all their legal responsibilities.

The equity and inclusive education policy of a board must address the eight areas of focus outlined in this memorandum, and must include a guideline on religious accommodation and an implementation plan. During the cyclical process of reviewing and revising their policies, boards will take steps to align all their other policies and procedures (e.g., on safe and accepting schools, student discipline, staff hiring and development) with their equity and inclusive education policy. This process will help to ensure that the principles of equity and inclusive education are embedded in all aspects of board and school operations.

School board policies must be comprehensive and must cover the prohibited grounds of discrimination set out in the Ontario Human Rights Code. The code prohibits discrimination on any of the following grounds: race, colour, ancestry, place of origin, citizenship, ethnic origin, disability, creed (e.g., religion), sex, sexual orientation, gender identity, gender expression, age, family status, and marital status. Boards may also address related issues resulting from the intersection of the dimensions of diversity that can also act as a systemic barrier to student learning.

## **POLICY DEVELOPMENT**

Equity and inclusive education policies and implementation plans will be consistent with the guiding principles and goals set out in the strategy, with the requirements in this memorandum, and with the revised ministry document entitled *Equity and Inclusive Education in Ontario Schools: Guidelines for Policy Development and Implementation, 2013* (hereafter referred to as “the guidelines”). These three documents should be used together when boards are reviewing and/or developing and implementing their equity and inclusive education policy, and when conducting their cyclical reviews of all their other policies.

When reviewing or developing their equity and inclusive education policy, boards are expected to consult widely with students, parents,<sup>9</sup> principals, teachers and other staff, school councils, their Special Education Advisory Committee, their Parent Involvement Committee and other committees (e.g., Diversity Committee; First Nation, Métis, and Inuit Education Advisory Committee), federations and unions, service organizations, and community partners in order to reflect the diversity of the community.

Boards have flexibility to adapt their equity and inclusive education policy to take into account local needs and circumstances.

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9. In this memorandum, *parent(s)* refers to parent(s) and guardian(s).

## Areas of Focus

The three goals of the equity and inclusive education strategy are as follows:

- *shared and committed leadership* by the ministry, boards, and schools to eliminate discrimination through the identification and removal of biases and barriers
- *equity and inclusive education policies and practices* to support positive learning environments that are respectful and welcoming to all
- *accountability and transparency* with ongoing progress demonstrated and communicated to the ministry and the community

In order to achieve these goals, each school board policy on equity and inclusive education will cover the following eight areas of focus.

### ***1. Board policies, programs, guidelines, and practices***

Through cyclical policy reviews, boards will embed the principles of equity and inclusive education in all their other policies, programs, guidelines, and practices, so that an equity and inclusive education focus is an integral part of every board's operations and permeates everything that happens in its schools.

Boards should make every effort to identify and remove discriminatory biases and systemic barriers that may limit the opportunities of individuals from diverse communities for employment, mentoring, retention, promotion, and succession planning in all board and school positions. The board's work force should reflect the diversity within the community so that students, parents, and community members are able to see themselves represented. The board's work force should also be capable of understanding and responding to the experiences of the diverse communities within the board's jurisdiction.

### ***2. Shared and committed leadership***

Board and school leaders must be responsive to the diverse nature of Ontario's communities. Leadership is second only to teaching in its impact on student outcomes. School boards and schools are expected to provide leadership that is committed to identifying and removing discriminatory biases and systemic barriers to learning. Specifically, boards will identify a contact person to liaise with the ministry and other boards to share challenges, promising practices, and resources.

In accordance with the principles of the ministry's Ontario Leadership Strategy, effective board and school leaders promote the development of collaborative environments in which participants share a commitment to equity and inclusive education principles and practices. This collaborative approach includes and supports the active engagement of students, parents, federations and unions, colleges and universities, service organizations, and other community partners.

### ***3. School–community relationships***

Schools and boards will continue building their capacity – with the active engagement of parents and school community partners – to create and sustain a positive school climate that supports student achievement and well-being. Each board and its schools should review the structures of existing committees and partnerships to help ensure that they reflect the principles of equity and inclusive education. Boards should expand upon their outreach efforts in order to foster new partnerships that engage a cross-section of diverse students, parents, staff, community members, and various organizations, including business groups (e.g., business education councils). Boards are encouraged to draw upon the expertise of their partners to explore innovative ways of sharing resources that can help them meet the diverse needs of their students and provide new and relevant learning opportunities. Strong, positive, and respectful relationships are necessary to effect real change so that all students can reach their potential regardless of personal circumstances.

### ***4. Inclusive curriculum and assessment practices***

Students need to feel engaged in and empowered by what they are learning, supported by teachers and staff, and welcome in their learning environment. To this end, boards and their schools will use inclusive curriculum and assessment practices and effective instructional strategies that reflect the diverse needs of all students and the learning pathways that they are taking. Schools must provide students and staff with authentic and relevant opportunities to learn about diverse histories, cultures, and perspectives. Students should be able to see themselves represented in the curriculum, programs, and culture of the school. Also, since schools have a pivotal role in developing the work force of tomorrow, students should be able to see themselves represented in the teaching, administrative, and support staff employed at the school.

Boards are expected to draw upon strategies that have been shown by the evidence to support student success and reduce achievement gaps. These include reviewing resources, instruction, and assessment and evaluation practices to identify and eliminate stereotypes, discriminatory biases, and systemic barriers. For example, schools could make use of differentiated instruction, which takes into account the backgrounds and experiences of students in order to respond to their individual interests, aptitudes, and learning needs.

In order to help ensure that assessment and evaluation are valid and reliable and lead to improvement of student learning, teachers must use assessment and evaluation strategies outlined in the assessment and evaluation section of the curriculum policy documents. Assessment tasks should be designed to ensure consistency of standards, and any discriminatory biases in the way students' work is assessed and evaluated should be identified and addressed.

### ***5. Religious accommodation***

School board policies on religious accommodation must be in accordance with the Ontario Human Rights Code and the requirements stated in Policy/Program Memorandum No. 108, "Opening or Closing Exercises in Public Elementary and Secondary Schools", and in sections 27–29 ("Religion in Schools") of Regulation 298. As part of their equity and inclusive education policy and implementation plan,

boards will include a religious accommodation guideline in keeping with the Ontario Human Rights Code, which prohibits discrimination on the grounds of creed (e.g., religion) and imposes a duty to accommodate.<sup>10</sup> Accordingly, boards are expected to take appropriate steps to provide religious accommodation for students and staff.

### ***6. School climate and the prevention of discrimination and harassment***

Board policies on equity and inclusive education are designed to foster a positive school climate that is free from discriminatory or harassing behaviour. A positive and inclusive school climate is one where all members of the school community feel safe, included, welcomed, and accepted. The principles of equity and inclusive education support a whole-school approach to foster positive student behaviour. These principles must also be applied in progressive discipline, particularly when it is necessary to take into account mitigating and other factors.<sup>11</sup> When relationships are founded on mutual respect, a culture of respect becomes the norm. Boards will also put procedures in place that will enable students and staff to report incidents of discrimination and harassment safely, and that will enable boards to respond in a timely manner.

Regular school and board monitoring of school climate is essential. Monitoring through school climate surveys, as outlined in Policy/Program Memorandum No. 144, “Bullying Prevention and Intervention”, can help identify inappropriate behaviours, barriers, or issues that should be addressed. Boards are therefore expected to incorporate questions on equity and inclusive education in their school climate surveys. Boards must require schools to conduct anonymous school climate surveys of their students and staff and the parents of their students at least once every two years, in accordance with subsection 169.1(2.1) of the Education Act.

### ***7. Professional learning***

Professional learning activities must be ongoing, evidence-based, and focused on positive outcomes. Boards will therefore provide opportunities for teachers (including guidance counsellors), support staff, administrators, and trustees to participate in training on topics such as antiracism, antidiscrimination, and gender-based violence, and will provide information for students and parents to increase their knowledge and understanding of equity and inclusive education. Boards are also encouraged to draw upon existing expertise within their own organization, other boards, and their own community partners and agencies. Changing individual and collective behaviour, as well as organizational and institutional practices, will help to ensure that the education system is free from discrimination.

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10. Under the Ontario Human Rights Code, the duty to accommodate requires accommodation to the point of undue hardship. For further details, see Ontario Human Rights Commission, *Policy on Creed and the Accommodation of Religious Observances* (1996), available at [www.ohrc.on.ca](http://www.ohrc.on.ca).

11. Ontario Regulation 472/07, “Suspension and Expulsion of Pupils”, identifies mitigating factors and other factors that must be taken into account in individual cases.



### ***8. Accountability and transparency***

Ongoing and open communication to keep all stakeholders informed of a board's goals and progress will increase transparency and public confidence in the board and its schools. It is expected that boards will post their equity and inclusive education policy on their website.

Board and school improvement plans, within the context of a board's strategic multi-year plan, will take into consideration the board's equity and inclusive education policy. The plans should focus on identifying and removing any barriers to student learning in order to reduce gaps in achievement and provide a respectful and responsive school climate.

Each board will post the Director of Education's annual report on its website, which will inform the ministry and the local community about the progress the board has made in meeting its strategic objectives in the previous school year and the action the board is taking in those strategic priority areas where goals are not being met.

## **IMPLEMENTATION**

The ministry recognizes that school boards are at different stages in the implementation of an equity and inclusive education policy. The ministry expects boards to demonstrate continuous improvement, so that progress is evident on an annual basis towards the goal of embedding the equity and inclusive education policy into all operations of the board.

Implementation plans will:

- contain clearly stated annual objectives and measurable outcomes at both the board and school levels;
- reflect consultation with community partners, and show evidence of active and ongoing partnerships with students, parents, and diverse communities;
- contain indicators for measuring and evaluating progress.

## **RESOURCES**

To support boards in developing, implementing, and monitoring their policy on equity and inclusive education, the ministry is providing practical strategies, advice, and templates in the guidelines. The ministry will also review and conduct research on promising practices in equity and inclusive education, and will disseminate this information to boards.

## APPENDIX: DEFINITIONS

The following definitions are included for the purposes of this policy/program memorandum only.

**Diversity:** The presence of a wide range of human qualities and attributes within a group, organization, or society. The dimensions of diversity include, but are not limited to, ancestry, culture, ethnicity, gender, gender identity, gender expression, language, physical and intellectual ability, race, religion, sex, sexual orientation, and socio-economic status.

**Equity:** A condition or state of fair, inclusive, and respectful treatment of all people. Equity does not mean treating people the same without regard for individual differences.

**Inclusive Education:** Education that is based on the principles of acceptance and inclusion of all students. Students see themselves reflected in their curriculum, their physical surroundings, and the broader environment, in which diversity is honoured and all individuals are respected.



<b>se</b>	<b>school (where)</b>	<b>example (what)</b>	<b>(who) was impacted</b>
2020-2021	2019 Cornwall	move to CEPEO	high school student
	UCDSB	technology	family of 5 children
	06-05-2021 CSDCEO	Free Chromebook	new gr7 & 9 students
2020-2021	all of SDG?	internet access	students & Families
since 2017	South Stormont	no high school	secondary students
2020-2021	English school boards	technology budgets	students learning at home
since 2018	all SDG	French board ads	all SDG communities
various	all high school	GLS course	grade 9 & Spec Ed
current & past	all high schools	how HS courses funded	HS students
current & past	all high schools	school sports teams	HS students
current & past	school boards	Geofutures pilot project	students & educators
past years	elementary	playground equipment	service clubs
current	all schools	mental health nurses	students
sept 2021	all schools	bell time changes	students
current	SDG	school with no FI	students
current	SDG	school with no child care	families
current	SDG	no Catholic HS in SDG	HS students
current	Williamstown	no library	students
current	South Stormont	no high school	HS students

<b>(how) was he/she/they impacted</b>	<b>(why) do you think this inequity occurred?</b>	<b>source</b>
no access	no IB program offered in English Catholic board	Horizon client
1 device provided by school board	not enough devices	Stephanie
French Catholic board only	English boards do not offer same	Stephanie
cannot access synchronious classes	internet services not funded by Ministry	Joyce
Ingleside busineses,co-op, PTjobs	no study of econmic impact of HS students	Jennifer
could not access learning	no Ministry policy on tech thus no funding envelop	Joyce
advertising in English	no Ministry policy on school board advertising	Tim S/Stephanie
offered after school, online or insumr	purpose of the course not understood	Sean/Monika
loss of course choice	outdated funding formula; incorrect premise	Monika
can't switch school boards	OFSAA rules	Jennifer
no response	school boards dont disseminate info	Carilyne
paid for it on board property	playgrounds not funded like school gyms MEO	Stephanie
suffered in the pandemic & before	MH health funding not accessed by boards	parents
new child care cost to parents	lack of feedback considered by school boards	parents
lack of opportunity no equity of accesssschool board decision on FI palcement		data
hardship, distance, cost	lack of policy and equit policy application	data
distance , travel, out of community	no ditance policy for transportation	data
no library in community schools	misapporpriation of funds for consturctuion	parents
travel to Tagwi or Cornwall for schoolclsoing of a JK-12 school		data/ parents

Ministry of Education  
Ministry Organization Chart

