



Submission to the 2024-2025 Education Funding Consultations

The Ontario Secondary School Teachers' Federation (OSSTF/FEESO) was founded in 1919. OSSTF/FEESO represents over 60,000 public high school teachers, occasional teachers, educational assistants, instructors, psychologists, secretaries, speech-language pathologists, social workers, plant support personnel, and many other educational workers.

OSSTF/FEESO is pleased to provide its submission to the Ontario Ministry of Education for the 2024-2025 Grants for Student Needs (GSNs).

The government continues to short-change Ontario's students, with the Financial Accountability Office of Ontario (FAO), in November 2022, projecting annual shortfalls in education funding totalling \$6.0 billion through 2027-28. This underfunding is despite significantly better financial positions being projected by both the government and FAO, who is projecting increasing budget surpluses for Ontario, reaching \$16.4 billion in 2027-28. Ontario is in a period where the economic recovery and inflation have pushed revenues to record levels that will remain high as inflation slowly eases. The government must increase investments in public education to meet the demands of our growing economy. The government should take this opportunity to invest in the future of Ontario – its children.

Publicly funded education in Ontario provides students with rich learning opportunities, skills, and a sense of community. These building blocks for student success enhance the social and economic fabric of our diverse, dynamic, and prosperous province. OSSTF/FEESO believes that a strong education system continues to be essential to Ontario's future and is the cornerstone of economic growth. In its 2019 report, "The Economic Case for Investing in Education," the Conference Board of Canada found that for each \$1.00 increase in public education spending \$1.30 is generated in positive economic impacts for the province. Investment in education creates a range of private, social, and fiscal benefits, such as higher tax revenues and costs savings in health care, social assistance, and criminal justice.

Despite the government's continued claims of historic investments in education, real GSN funding has not kept up with the pace of enrolment growth and inflation. Ricardo Tranjan, of the Canadian Centre for Policy Alternatives, determined that taking inflation into account, school boards received an average of \$1,200 less per student in the 2023-24 school year than what they received in 2018-19. This year alone, funding was an average of \$600 lower per student than the year before.

OSSTF/FEESO believes that all students deserve to have every opportunity to reach their full potential and succeed personally and academically, with access to rich learning experiences that provide a strong foundation of confidence that continues throughout their lives. Ontario continues to need well-educated, intelligent, skilled, strong, and resilient workers and a public education system that will support all students and their needs. The priority of this government must be to address these funding shortfalls and to make significant investments to address mental health and the widening gaps in inequity among the diverse peoples of Ontario.

The current education funding model, which was developed over 25 years ago specifically to limit education funding, created disparities that have only been exacerbated over the years. Over two decades ago the [Education Equality Task Force](#), led by Dr. Rozanski, recognized these disparities, the underfunding of school maintenance and operations, the negative consequences of the funding formula's fixation with uniformity and its inadequate funding for special education, programming for students at risk, and support for students whose first language is neither English nor French. In the years since the funding formula was introduced government changes have only compounded those issues and school boards are left to make tough choices on the allocation of funding to areas of crisis because they are not receiving enough funding to support the programs that students need.

Special Education funding, for example, has been capped overall and inequitably distributed amongst school boards based on complicated statistical projections which do nothing to address individual student needs. There are also inequities in the funding of adult and continuing education, occasional teachers, education workers, class size, at-risk student programs, student transportation, as well as in many other areas.

OSSTF/FEESO is committed to equity and believes that significant increases in investments in education funding must be made so there is adequate funding for boards to address inequalities that occur as a result of income levels, gender, race, special education identification, new immigrant, and Indigenous status. Improving learning conditions for all is about recognizing and meeting the unique needs of learners. We see learning conditions as equity conditions, creating an improved Ontario.

OSSTF/FEESO calls on the government of Ontario to invest in our greatest asset, the many people who access Ontario's world-class public education system. The economic payoff is indisputable. Now is the time to act to strengthen public education.

OSSTF/FEESO's submission is contained in two parts. Part A, which responds directly to the Funding Engagement Guide and the questions posed by the Ministry of Education; and Part B, which provides additional submissions on education funding.

Part A – Funding Engagement Guide

STRENGTHENING ACCOUNTABILITY AND ENHANCING TRANSPARENCY

Considerations:

1. *What reforms can be made to the GSN funding formula to:*
 - i) *reduce its complexity?*
 - ii) *enhance the transparency on how school board funding is used?*
2. *What opportunities are there to strengthen accountability while balancing administrative requirements?*
3. *What opportunities exist to better communicate to taxpayers:*
 - i) *how GSN funding is allocated to school boards?*
 - ii) *how school boards use GSN funding in alignment with government priorities?*

OSSTF/FEESO must highlight that administrative requirements and reporting provide accountability for the use of funds and ensures the funds are used in a way that maximizes services to students. Reductions in reporting and administration must result in improved services to students and any savings should be reinvested into direct supports for students. OSSTF/FEESO has repeatedly expressed concerns about transparency and accountability for the school board spending, particularly for the Learning Opportunities Grant and Priorities and Partnerships Funds allocations. Reporting on both has been notoriously lacking.

School boards should be more transparent with all funds they receive and should provide timely reporting on the details of the spending of those allocations. This should include data on exactly how the funding was spent, including a full disclosure on what percentage of the funds was invested directly on student learning and front-line engagement of students. Creating a publicly accessible online dashboard for tracking and visualizing the distribution, generation and allocation of GSN funds by individual school boards would be a significant step towards enhancing transparency in Ontario's education funding. A platform that offers real-time, user-friendly access to complex financial data would make it more comprehensible for members of the public and stakeholders, fostering engagement while also enhancing accountability. School boards should use this data to report regularly in an accessible and plain language format on trends, disparities, and best practices.

A windfall of savings and administrative burden can be achieved by eliminating the Education Quality and Accountability Office (EQAO). EQAO testing has not proven itself to provide any value for money. The current standardized testing regime creates high-stakes, high-stress, low utility evaluations. Alternative methods of testing would save millions of taxpayer dollars that could be better invested in staffing schools with caring adults to support students in their education and well-being. OSSTF/FEESO recommends that the EQAO and its testing programs be discontinued, and the savings are reinvested into student learning. At a minimum, more cost-efficient alternative methods of standardized testing, such as randomized tests, should be used.

The Education Equality Task Force, led by Dr. Rozanski, recommended a regular review of education funding. That report recognized that school boards were not funded properly in a variety of areas, which forced school boards to use funds from other grants to meet their obligations. As well, the report documented the underfunding of school maintenance and operations and the negative consequences of the funding formula's fixation with uniformity and its inadequate funding for special education, programming for students at risk, and support for students whose first language is neither English nor French.

OSSTF/FEESO recommends that an expert panel that includes members from all stakeholder groups should be convened to conduct a review of the GSNs and additionally consider funding with the lens of equity and inclusion. This panel should meet at set intervals to conduct ongoing reviews, for example, every three to five years. The funding formula has not been reviewed since 2002, leaving the public education system critically underfunded and schools in desperate need of repair.

Additionally, involving parents, communities, and stakeholders in budget decisions through advisory committees, and mandating annual public consultations, strengthens transparency. Advisory committees facilitate comprehensive discussions, providing diverse perspectives to shape well-informed decisions. Public consultations allow a broader range of voices to be heard, fostering community engagement, and ensuring GSN funding aligns with real needs. These integrated elements promote accountability, informed decision-making, and an efficient allocation of resources, all vital for the continuous improvement of Ontario's education system.

SPECIAL EDUCATION – SPECIAL INCIDENCE PORTION (SIP) AND SPECIAL EQUIPMENT AMOUNT (SEA)**Considerations:**

4. *What reforms can be made to SIP and SEA to:*
 - i) *Reduce administrative burden and streamline processes?*
 - ii) *Recognize the complexity of student needs across the different special education delivery models (example: self-contained classroom setting versus fully integrated setting)?*
 - iii) *Ensure the allocations are meeting their intended purpose?*
 - iv) *Support flexibility to meet local priorities?*

Funding for special education and programs for at-risk students must be expanded so that all students receive the support they need to ensure they succeed. OSSTF/FEESO advocates for needs-based funding so that all students who require services and supports have every opportunity to reach their full potential and succeed personally. Funding should be based on the student's needs and not on convoluted statistical projections or historic patterns. The allocations in the Learning Opportunities Grant and Special Education Grant should be supplemented by funding to support learners based on their needs. Furthermore, improvements to comprehensive needs assessments, professional development and flexible SIP and SEA funding should be considered. Comprehensive needs assessments will play a crucial role in the reform process. These assessments will ensure that the specific requirements of each student with disabilities are thoroughly understood, regardless of the chosen delivery model.

Furthermore, future funding changes should also involve creating flexible funding pools within SIP and SEA. These funding pools will enable school boards to allocate resources based on individual student needs and the chosen delivery model. These needs can quickly evolve, and flexible funding would allow the school boards to adjust solutions without further delays causing harm to students' progress. The reforms should expand these funding pools and enhance the flexibility they offer. This will allow school districts to adapt to changing student needs, be it in self-contained classrooms, integrated settings, or any other model, ensuring that resources are appropriately distributed to support the complexity of student requirements.

Mental health supports for students, including trauma and learning support, from early learning through post-secondary, should be increased and a breadth of supports available in every school. The government should fully fund and support mental health services in schools that are provided by board-employed professionals and paraprofessionals so that students are healthy and able to succeed. More intensive mental health services should be available by referral from schools, obtained in a timely manner, and be fully funded so there can be seamless and equitable access across Ontario. This approach will effectively address the diverse needs and socio-economic disparities within the student population.

The inadequate funding of special education programs has contributed to an unprecedented rise in violent behaviours in schools. A growing number of OSSTF/FEESO members have reported incidents involving biting, punching, kicking, spitting, and other forms of assaults by students year after year. These members, primarily educational assistants, but also teachers, work with high-needs students in special education classrooms. This issue has caused severe physical and psychological impacts on education workers and students. This also comes with increased costs in lost time, sick leave benefits, WSIB, and administrative time and resources. The GSNs should provide real funding and supports that address the issue of violence behaviours in schools.

In 2021, University of Ottawa researchers published a report titled [*In Harm's Way*](#). The report found that an alarming 87% of personnel operating within classroom-based settings have attested to experiencing considerable adversity in the form of harassment and violence. This adverse phenomenon has exerted a pronounced and deleterious impact on their professional and personal lives, to the extent that it has placed them at the precipice of burnout and contemplation of disengagement from their respective vocations. This situation is particularly alarming in the context of an education system that is already grappling with the formidable challenges of workforce recruitment and retention. The culmination of these factors poses a severe risk to the availability of essential support structures for students, thus imperiling the very foundations of educational efficacy.

OSSTF/FEESO's campaign *End the Silence → Stop the Violence* has highlighted this issue and brought it to the attention of the government. In response, the Ministry of Labour released a document in March of 2018 titled, *Workplace Violence in School Boards: A Guide to the Law*. School boards must be compelled to utilize the best practices in this guide to ensure compliance with the Occupational Health and Safety Act and to provide a safe working environment for staff and a safe learning environment for students. Providing new, comprehensive and education sector-specific health and safety training during Professional Development/In-service training days, or other paid time, to all school board employees, is essential if the Ministry and School Boards hope to reduce workplace violence. Increased funding must be provided to school boards to create programs that protect those who work with high-needs students. More education assistants, specialists, and professional student support workers must be hired to support high-needs students and reduce injuries to educational workers.

The GSNs should be adjusted to provide education assistants for students in secondary by adding funding generators for educational assistants in the Pupil Foundation Grant (PFG), just as they are funded throughout the elementary grades. Education assistants in secondary schools could help address diverse student needs, support inclusive education, and provide specialized assistance for learners with disabilities or special needs. Education assistants contribute to classroom management, offer individualized support, and promote emotional well-being. Throughout every stage of a student's learning journey their presence is essential for a smooth transition to secondary school, ensures compliance with legal obligations, and enhances the overall learning experience for students. Students' need for supports does not disappear after Grade 8. Without this funding to support students with differentiated needs, school boards are forced to take funds from other allocations to pay for educational assistants assigned to students in secondary schools.

In summary, OSSTF/FEESO's recommendations represent a comprehensive approach that prioritizes investments aimed at enhancing Ontario's publicly funded education system in a manner that will provide the resources and supports required to meet complexity of student needs across the province. Needs assessment will ensure individualized support, professional development will equip educators to meet these diverse needs, and flexible funding pools will enable responsive allocation of resources. This will ultimately enhance the inclusivity and effectiveness of Ontario's special education programs.

Part B – Other Considerations

1. The best way to improve student success is investment directly into classrooms and services for students. This investment in school-based staff will assist students in overcoming challenges that prevent them from reaching their full potential. Numerous studies have shown that the best method of improving education outcomes is by directly supporting students in the classroom; any support must be directed to the classroom or student services instead of administration.
2. Inequities exist in every classroom in Ontario. To properly address these inequities, funding should be directed to improve learning conditions where they are needed. With smaller class sizes in all schools, all students achieve greater success. Students should have opportunities for learning and growth within their diverse communities. Systemic inequity must be addressed through a change that provides positive impacts to equity- and sovereignty-seeking groups, and these changes must be actionable and permanent.
3. The proper implementation of de-streaming is paramount for enhancing student success and addressing the diverse range of needs within our educational system. This process must not only entail the removal of streaming but also incorporate curriculum modifications that truly reflect inclusion, diversity, and cultural relevance, providing engaging and equitable educational experiences for all students. Crucially, any de-streaming initiatives should be accompanied by a commitment to permanent funding to rectify systemic inequities that students often encounter. This funding should address disparities in access to technology, curriculum opportunities, programming, and educator support. These crucial supports encompass a range of measures, including the reduction of class sizes, comprehensive training for educators, dedicated time for them to adapt and plan for the new curriculum, and the development of rich resources specifically designed to support de-streaming efforts and tackle systemic inequity. The primary goal of this approach is to ensure that every student, regardless of their background, abilities, or circumstances, can thrive within an inclusive and diverse educational environment. By addressing these systemic issues and providing the necessary resources and support, we can create a more equitable and enriching educational system that maximizes the potential for student success and fosters diversity and inclusion as core values.

4. The government should eliminate hybrid instruction and mandatory e-learning. The richest learning occurs in-person. Hybrid learning must be abolished, and remote learning must be used sparingly in emergency situations like the pandemic, where students would be unable to learn in-person for long periods of time and other options are not viable. While some students may benefit from e-learning, no students should be mandated to take e-learning courses. The mandatory e-learning graduation requirement should be removed.
5. Full Day Kindergarten (FDK) funding should be reinstated and should be fully allocated to Early Childhood Educators (ECEs). Funding generated through the Kindergarten and Primary Pupil Foundation Allocations for ECEs has been underspent by over \$200 million since 2014-15. Boards have used their discretion under the funding rules and legislation to reallocate these funds elsewhere. OSSTF/FEESO members working in the FDK program report high class sizes, classes in which no ECE is assigned, and multiple split classes – all a direct result of boards choosing not to allocate FDK funds to ECEs. OSSTF/FEESO is calling on the government to envelope the funds generated for FDK so that the program can operate as intended and not be used to subsidize other chronically underfunded portions of the GSNs.
6. Adult day school and adult non-credit continuing education funding should be adjusted to be equitable with regular day school funding. There exists an inequity between adult day school programs that serve students who are primarily 21 years old or older and regular day school programs. These programs are identical to regular day school programs for students under the age of 21 but are funded at a level that is far below those programs. All learners, regardless of age, deserve to have every opportunity to reach their full potential and succeed personally and academically, with access to rich learning experiences that provide a strong foundation of confidence that continues throughout their lives. GSN funding for these programs should be increased.
7. Similarly, non-credit adult programs in English as a Second Language and Literacy and Basic Skills are funded at a far lower level than regular day school programs for all students. In school boards that offer Language Instruction for Newcomers to Canada (LINC), Literacy and Basic Skills (LBS), Adult English as a Second Language (ESL), and other non-credit programs for adults, the funding is from different ministries with the LINC funding coming from the federal government. These streams of funding do not provide for appropriate administration and preparation time needed by Adult Education Instructors to ensure the program requirements are met. Portfolio Based Learning Assessment methodologies have been mandated as the method of assessment and time required to adequately operationalize the program is non-existent, creating tremendous pressure on Adult Education Instructors and frustration for students.

Improving language skills in adults, including those new to Canada, has a significant positive impact on the economy as these adults seek employment within Ontario. As well, many of these programs operate on a continuum with schools where individuals enrolled in ESL will progress to LBS and then enrol to take credit courses with the school board. Increases in funding for these students will allow them to achieve their full potential and faster contribute to the growing economy of Ontario. The funding for these programs should be consolidated under the Ministry of Education and must also be increased.

8. Increase the funding to repair schools and fully address the larger than \$16.3 billion backlog. The disrepair of schools is not only dangerous for staff and students; it also impacts the learning environment and student success, including their mental health and well-being. The government has pledged to spend \$13 billion over ten years, but this rate of funding is plainly insufficient to keep pace with the need for repairs. The government must address the repair backlog with additional funding by increasing the out-of-date benchmarks for pupil accommodation. The School Operations Grant must be funded to a level that will maintain the good repair of buildings so that Ontario's backlog stops growing. Additional funding to meet the 2025 Accessibility for Ontarians with Disabilities Act (AODA) deadline should also be provided.
9. The benchmarks in the funding formula for education workers are not consistent with current salaries. They should be updated to better reflect the education, value, and expertise of these essential members of the school team who often respond to students with complex and evolving needs. Education worker salaries, in many school boards, are very low and should be adjusted, so school boards are not forced to redirect funds from other grants or programs. With the current pronounced shortage of qualified education workers, a significant salary enhancement is needed to attract and retain these valuable and dedicated workers who are critical to the success and well-being of students.
10. Funding across all grants should be increased annually at a minimum to cover annual inflationary increases in goods and services. The government has consistently underfunded school boards for the costs of goods and services school boards must procure. For example, within the Pupil Foundation Grant for 2022-23, every allocation is funded with an increase that is far below the current rate of inflation. This underfunding of grants puts pressure on school boards that result in funds being diverted from other programs, classrooms, and students to support the increased costs of goods and services.
11. Immediately end the practice of removing taxpayers' money from the education envelope and putting it in the hands of parents. Some of this money will work its way into the private school system and the pockets of people who seek to profit from education. Because of economies of scale, this funding would be much more effective if used by school boards to improve services and programs to students, such as reducing class size and providing other supports to students who need them. This government claims to be accountable and transparent, but this program is exactly the opposite of those goals.
12. Following the passage of *The School Boards Collective Bargaining Act*, the ministry allocated funding, through the Administration and Governance Grant, essentially to pay school boards' fees to their respective trustee associations. This taxpayer-provided funding is unaccounted for by school boards. OSSTF/FEESO insists that the trustee organizations be required, through law, to report publicly the allocation and expenses of these funds for the interest of public accountability and transparency.