



Submission to the 2022-2023 Education Funding Consultations

The Ontario Secondary School Teachers' Federation (OSSTF/FEESO) was founded in 1919. OSSTF/FEESO represents almost 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 2022-2023 Grants for Student Needs. OSSTF/FEESO is very concerned that public education continues to be underfunded. The Financial Accountability Office of Ontario projects an annual funding shortfall in education of \$200 million for 2021-22, growing to a shortfall of \$2.9 billion by 2029-2030. In the present school year, per pupil spending, excluding direct transfer payments to parents and time-limited COVID-19 spending, in education is lagging inflation significantly and is resulting in pressures on school boards to redirect funding from classrooms to address these increased costs. This underfunding does not include a growing school repair backlog that was estimated at nearly \$16 billion by a 2017 independent assessment of Ontario's Auditor-General. This backlog continues to grow due to the chronic underfunding of school maintenance annually, which was then projected to be at about only 10% of what is necessary to ensure Ontario's schools are maintained in a good state of repair.

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. The current education funding model, which was developed nearly 25 years ago, created disparities in funding that have only been exacerbated over the years. Next year marks the twentieth anniversary of the Rozanski report, which then recognized the underfunding of school maintenance 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. Program changes since then have magnified these issues and have been consistently underfunded, forcing school boards to redirect funding from other programs. Special Education, in particular, is funding that has been consistently capped overall and divided out among school boards in an inequitable system 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 support staff, class size, at-risk student programs, student transportation, as well as in many other areas. OSSTF/FEESO is committed to equity and believes that 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.

Education 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. As Ontario moves out of the pandemic, it will need well-educated, intelligent, skilled, strong, and resilient workers. 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.

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.

Our submission is contained in two parts. Part A responds directly to the Funding Engagement Guide and the questions posed by the ministry, and Part B, which provides additional submissions on education funding.

Part A – Funding Engagement Guide submissions

MENTAL HEALTH SUPPORTS

Considerations:

1. *How are ministry supports helping school boards meet the mental health needs of their students?*
2. *What can the Ministry of Education, other ministries, school boards and other partner agencies do to better support the mental health needs of students?*

The current funding of mental health and well-being through the Grants for Student Needs and Priorities and Partnerships Fund provides approximately \$104 million of funding to support mental health initiatives, of which only \$25 million supports front-line service delivery. There is a need for mental health professionals to provide services directly to students in Ontario's schools. Schools are the initial point of contact of many students for mental health needs. All tiers of services should be structured through schools to make them more accessible, equitable and inclusive. Schools should be fully integrated as community mental health providers.

OSSTF/FEESO believes that there is a need for comprehensive Tier 1 and tier 2 mental health services within schools supplemented by access to tier 3 services within the community, as appropriate. Students who require tier 3 services often face barriers to access, significant wait-times or a lack of available services in their communities. Intensive mental health services should be available by referral from schools, be timely, and be fully funded by the appropriate ministry so that there can be seamless and equitable access in every community in Ontario.

Tier 1 and Tier 2 services should be provided by board-employed professional student services personnel and paraprofessionals. Any gaps in service should first be addressed by hiring additional board-employed staff to enhance the services available to students in schools. If it is not possible to provide a service internally through board-employed staff, when considering external partnerships school boards must avoid duplication of services provided by existing board-employed staff and ensure a partnership protocol is in place.

Funding for mental health and well-being supports for all students must be permanent, predictable, and meaningful. These supports strengthen learner outcomes and translates into increased graduation rates, student opportunity, and success. School boards must be accountable for ensuring that all funding provided for mental health and well-being is used effectively to provide the intended supports to students. A school-based team of professionals who have experience and an existing connection to schools is in the best position to support the needs of students. Any funding should maximize the amount of front-line services and be used to hire additional dedicated board staff to deliver service directly to students in schools as part of the school team of trained, experienced, and dedicated professionals.

There are also other factors that contribute to well-being and positive mental health that should be addressed to make schools safe and respectful. All services for students should be evaluated through the lens of equity and inclusion. Systemic inequities must be addressed through change that provides positive impacts to marginalized groups and these changes must be actionable and permanent. There must be a focus on addressing issues affecting equity- and sovereignty-seeking groups. Equity objectives are best when funding is accessible and widespread. Having more staff in buildings creates safer schools and promotes worker mental health and healthy communities. All initiatives must start with consultations and collaboration with all stakeholder groups to support open dialogue and action.

REDUCING ADMINISTRATIVE BURDEN AND RED TAPE

Considerations:

1. *What initiatives could support the reduction of red tape and administrative burden for the education sector?*
2. *Are there areas of overlap or duplication within the GSN (e.g., funding or reporting)? If so, what are they?*

While “red tape” and administrative burden could be reduced, OSSTF/FEESO must point out that these measures are designed to provide accountability for the use of funds and to ensure the funds are used in a way that maximizes the investment in terms of providing services to students. Reductions in reporting and administration must result in improved services to students and any saving should be re-invested.

OSSTF/FEESO has expressed many times that we are concerned about accountability for the school board spending of Learning Opportunities Grant and Priorities and Partnerships Funds allocations. Reporting on both has been notoriously lacking. It is unclear whether these programs have been evaluated critically to determine whether they have indeed increased positive student outcomes. In every school board, valuable funding has been re-directed from the classroom and students to assign teachers, principals, and education support staff to areas that are administrative in nature. Streamlining reporting is important, but making sure that evaluations of these programs are properly done is essential to ensure value for money.

All programs should be evaluated critically and individually to ensure resources are being provided directly to students and are not being redirected from classrooms and front-line workers.

Finally, some school boards continue to accumulate large surpluses, even during the pandemic, that have been realized by not spending resources on students, schools, staff, and direct services to students. The ministry should ensure that school boards spend allocations provided and do not accumulate excessive surpluses year-to-year.

OSSTF/FEESO notes the following duplications and also identifies potential savings for the ministry.

Ontario has a duplicate education system running with the Catholic education system. Moving to one public education system in each official language would eliminate an enormous amount of duplication. Ontario is a multi-cultural, multi-faith society. Our public education system brings

together students from diverse backgrounds to build a shared sense of community. Singling out one religion, for separate education funding, runs contrary to public education's commitments to universality and equity. In 2012, the Federation of Urban Neighbourhoods in Ontario estimated that the province could save between \$1.2 and \$1.6 billion annually by moving to a single public education system in each official language. Savings from efficiencies due to duplication of service, the creation of central consortia, the elimination of promotion and advertising costs related to competing with coterminous school boards for students, and the potential of selling surplus tangible capital would result in a real reinvestment in education. These dollars would be better spent in our schools and on our students. OSSTF/FEESO recommends involving all education stakeholders in a discussion about moving toward one public education system in each official language.

A windfall of savings 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 premier has already indicated that he understands the shortcomings of the EQAO. As educators, OSSTF/FEESO and our members have never been opposed to testing. However, testing should support learning and be interpreted in relation to other forms of assessment and evaluation. The current standardized testing regime creates high-stakes, high-stress, low utility evaluations. Moreover, regular publication of standardized test results from the EQAO creates a politically charged environment, where schools, portrayed as competing with one another, receive questionable ratings based on narrow criteria. We are deeply invested in high quality education and eager to support strategies that will improve education outcomes. The Ministry of Education spends approximately \$35 million per year to operate EQAO. Many alternative methods of testing (e.g. randomized) 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 be re-invested into student learning. At a minimum, more cost efficient alternative methods of standardized testing, such as randomized tests, should be used.

The *School Boards Collective Bargaining Act* was intended to reduce the costs associated with collective bargaining in Ontario's education sector. The primary mechanism for these savings was to be a restriction on the items negotiated at the central tables to matters requiring provincial funding – primarily salaries and benefits. However, the SBCBA currently allows school boards to bring administrative issues and issues related to working conditions to the central tables. As a result, school board participation in the last round of central bargaining stalled progress and added costly months to the bargaining process. Working conditions and administrative issues should be negotiated between the school boards and the unions at local bargaining tables, rather than at the central table. The Ernst and Young review agreed that this type of negotiations model would be more efficient. OSSTF/FEESO recommends that the government work with OSSTF/FEESO, ETFO, OECTA, and AEFO to streamline central bargaining. A more efficient bargaining process will focus central bargaining on salaries, benefits, and other provincial funding-related matters, bargaining directly between the government and the unions. School board associations would provide a consultative role rather than a decision-making role at the central table.

A final area of potential savings stems from the dependence of school boards on rights arbitration, which should be reduced. A fair, effective, and timely grievance procedure is an essential component of effective labour relations. Our Collective Agreements contain grievance procedures that allow for speedy resolution of disputes. Unfortunately, school boards have shown an increasing tendency to rely on the longest, and most expensive mechanism in our procedures: rights arbitration. Between 2011 and 2016, the incidents of arbitration (where costs were incurred) nearly tripled from 1.53 arbitrations per 1,000 members to 4.34 arbitrations per

1,000 members. Predictably, most school boards have been unwilling to disclose how much is spent in legal and other fees associated with rights arbitrations, but preliminary accounts show that boards are spending hundreds of thousands of dollars per year. These costs are unnecessary and defaulting to rights arbitration creates needless delays and stress for frontline education workers. OSSTF/FEESO recommends that the province review school board expenditures on rights arbitration to identify overall trends and specific problem areas. We further recommend that the Minister of Education intervene to discourage school boards from relying on rights arbitration as a default strategy when resolving grievances.

LEARNING OPPORTUNITIES GRANT

Considerations:

1. *Given that the 2021 census is nearing completion, what is the best way to integrate updated census information into the GSN?*
2. *Should the Demographic Component of the LOG be focused on a specific outcome(s)? If so, what are they?*

OSSTF/FEESO believes that a review of LOG funding is long overdue and recommends that an expert panel be appointed by the government to review LOG funding. Such a review must include the following issues:

- funding level;
- at-risk programming;
- effectiveness of school board based programs;
- whether the demographic components of the current LOG are achieving the goals of LOG, or if those demographic components need to be updated or new ones added to reflect all marginalized groups;
- whether LOG funds need to be enveloped; and
- the creation of an accountability mechanism that school boards must report publicly.

The Ministry should stop the practice of limiting funding to an envelope in an amount that does not adequately address the actual need. Currently, the funding formula has sections that distribute a set amount of funding based on census data. However, the funding is not increased to meet the need of Ontario students. Instead, the funding is removed from one school board and given to another. At the end of the day, the needs of the students still go unaddressed.

In addition to LOG funding, the government should change the Differentiated Special Education Needs Amount (DSENA) from a prediction model to one that addresses actual need. This allocation of the Special Education Grant is designed to address variation among school boards with respect to the special education needs of their students and the boards' abilities to respond to those needs. However, the current model is based on statistical predictions and the overall enrolment of every student in the board as a whole, rather than meeting the unique individual requirements of students with the highest needs. The current model also relies on out-of-date long form census data. This model should be changed to provide funding to school boards based on the actual needs of each board's special education population, not just the overall population.

Any changes made must include phase-in provisions. When school boards are stripped of funding, they do one of two things: cut teachers and education workers and/or cut programs. Neither one is beneficial to students. If the government will not fund the education envelope properly, then any changes need to be made slowly, so that school boards can make longer-term plans on what services to students they are going to cut.

The current funding formula ignores the inherent differences between urban, suburban, and rural areas. Adjustments must be made to the basic funding formula so there is adequate funding for boards to address inequalities that occur as a result of income levels, gender, race, special education identification, and newcomer and Indigenous status.

Any allocation of funding based on proxy measures, such as demographics and statistical projections, can lead to systemic inequities. OSSTF/FEESO advocates for needs-based funding so that all students who are in need of services and supports have every opportunity to reach their full potential and succeed personally.

Student success cannot be measured by a single standard due to the many and varying challenges that individual students face such as poverty, hunger, geography, bullying, and learning disabilities. Each student's success will look different from the next. The education system cannot be measured in the same way a business measures its success. Students are not products that can be measured against a standard and declared successful or not. Funding should never be tied to student success. OSSTF/FEESO opposes any use of standard outcomes as a measure of success.

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.

By focusing on higher need areas, better outcomes can be achieved with targeted reductions in class sizes for at-risk students and students identified with special education needs. These classes should be funded beyond the current class size average, based on a model of ADE, for at-risk students and students in special education. Accountability is necessary to maximize the impact on students.

School boards need to demonstrate how the allocations of the LOG, PPF, ESL, and other allocations for specific student learning, have a direct impact on student outcomes. Each school board should be able to show that additional support personnel, lower class sizes, or other classroom resources have been allotted to improve student outcomes. Funding spent on programs that cannot be shown to demonstrate direct student support, should be ended and the funds redirected to areas of the funding formula where this can be demonstrated.

URBAN AND PRIORITY HIGH SCHOOLS

Considerations:

1. *Should the school board list be updated to respond to changing demographics and growth within school boards? If so, what factors should be considered in updating the school board list?*

2. *How can the ministry ensure that the funding allocation is spent on supports for the most academically challenged at-risk students?*

Inequities exist in every classroom in Ontario. In order 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 own diverse communities. More school-based services should be made available, including mental health and speech and language services. Specifically, school boards should be provided with increased funding for services by board-employed practitioners.

De-streaming must be properly implemented with curriculum modifications that reflect inclusion and diversity and that are culturally appropriate and engaging. Any de-streaming of courses must be accompanied by permanent funding to address systemic inequities that students experience with access to technology, curriculum opportunities, programming, and educator support. Supports would include: smaller class sizes, training, time for educators to adjust and plan for a new curriculum, and rich resources developed specifically for de-streaming and addressing inequity.

All services for students should be viewed through the lens of equity and inclusion. Systemic inequity must be addressed through change that provides positive impacts to equity- and sovereignty-seeking groups, and these changes must be actionable and permanent.

Newcomers to Canada must have access to increased supports for English or French language learning. These supports should be provided in schools and through adult education centres, and should address the increased need that school boards across the province are experiencing. School boards must be held accountable for ensuring that language funding for newcomers provides comprehensive classroom supports.

OSSTF/FEESO is concerned that, any allocation of funding based on proxy measures, such as demographics and statistical projections, can lead to systemic inequities. OSSTF/FEESO advocates for needs-based funding so that all students who are in need of services and supports have every opportunity to reach their full potential and succeed personally and academically, regardless of inequities that result from income levels, gender, race, special education identification, and new immigrant and indigenous status.

Finally, all students should have access to in-person learning and not be subjected to hybrid classrooms. In-person learning helps to diminish inequities in education for equity- and sovereignty-seeking groups. There should be no requirement for mandatory e-learning. Where remote instruction is necessary, it should occur in a single modality through dedicated virtual learning programs, with smaller class sizes and appropriate resources, which allow for teachers and education workers to provide high quality learning opportunities for all students. Funding and support must be provided for culturally-responsive curriculum, learning materials, assessment and evaluation, testing, and learning environments. As with in-person learning, direct and specific supports must be provided, where needed, to bridge gaps caused by inequity and to increase student success and well-being.

NEW TEACHER INDUCTION PROGRAM

Considerations:

1. *Given that there is no fixed benchmark for the NTIP, are school boards facing challenges due to funding varying every year with the fluctuation in the number of teachers?*
2. *What would be the benefits and/or challenges to having a fixed benchmark?*

The New Teacher Induction Program serves an important role in providing new teachers with support as they begin their careers. These teachers are at the most vulnerable point in their career and NTIP funding should be restricted to directly supporting those teachers. Any additional funding that directly supports new teachers is welcome.

All teachers should have the opportunity for NTIP, regardless of employment status. Since occasional teaching is generally the path to full time work, NTIP would serve to create better, and more prepared, teachers. It is not uncommon for occasional teachers to be employed in long-term assignments over the course of five years or longer before securing a permanent position. It makes sense that such teachers will have had access to NTIP at the beginning of their careers, rather than waiting until they have secured a permanent contract. It is critical that all teachers, whether permanent, long-term, or occasional, have access to NTIP, professional development, and mentorship to support their continued professional growth and that, in the event of an unsatisfactory evaluation, they have access to assistance to improve.

Part B – Other Considerations

1. End transfer of taxpayer funds to parents. 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. Almost \$1.7 billion dollars was handed out with zero accountability to the system as to what that money was spent on. This "mini" voucher system has stripped desperately needed funding from the education sector that could provide special education students with additional supports or full programs to secondary school students. This government claims to be accountable and transparent, but this program is exactly the opposite of those admirable goals.
2. Increase the education worker benchmarks in the GSN. The benchmarks in the funding formula for education workers are not consistent with current salaries. These benchmarks should be updated so that money does not have to be taken from other areas of the GSNs to make up the shortfall.
3. 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 will not 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.
4. Increase the funding generators for EAs in the PFG. Funding for EAs to support students should be increased across all divisions to support students. Currently, there is no funding generator for educational assistants in the Pupil Foundation Grant at the secondary level,

although there is in each of the elementary divisions. Students' need for supports do not disappear after Grade 8. Without this funding to support students with differentiated needs, school boards are forced to take money from other allocations to pay for educational assistants assigned to students in secondary schools. By putting a generator into the GSNs for these essential education workers, the ministry could better assess where money is going and relieve pressure on funding intended for other projects or purposes.

5. Update support staff salary benchmarks. 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. Support staff 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.
6. Reinstate FDK funding and ensure full allocation to ECEs. For several years, funding generated through the JK-3 Pupil Foundation Grant for ECEs has been constantly underspent. By analyzing the EFIS reporting from school boards since the program's full inception, OSSTF/FEESO has found that since 2014-2015, over \$200 million earmarked for ECEs in Full Day Kindergarten has not been used for ECE staffing. For 2016-2017, this amount alone was over \$80 million provincially. Boards have used their discretion under the rules of the GSNs to reallocate these funds elsewhere. OSSTF/FEESO members working in the FDK program report high JK/SK class sizes, classes in which no ECE is assigned or 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.
7. Accountability of School Boards for Trustee Association Fees. 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 publically the allocation and expenses of these funds for the interest of public accountability and transparency.
8. Increase funding in all grants, at a minimum, to cover inflation. The government has underfunded school boards for the costs of goods and services school boards must procure. For example, within the Pupil Foundation Grant for 2021-22, every allocation is funded with an increase of less than 1%, with the exception of Supply Teacher, which is funded at 1%, far below the current rate of inflation. This underfunding puts pressures on school boards that result in funds being diverted from other programs, classrooms, and students to support the increased costs of goods and services.
9. Provide real funding and supports to address violence in schools. Violence in schools remains a huge problem for all education workers. 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 reached a crisis level, with severe physical and psychological impacts on education workers. This crisis also comes with increased costs in lost time, sick leave benefits, WSIB, and administrative time and resources. OSSTF/FEESO's program 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 in order to ensure compliance with the Occupational Health and Safety Act. Providing proactive health and safety training, during PD days or other paid time, to all school board employees, is an important step toward reducing the incidents of 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.

10. Increase funding for adult day school and adult non-credit continuing education. 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.

Similarly, non-credit adult continuing education is funded at a far lower level than regular day school programs for all students. In school boards that offer LINC, LBS, Adult ESL, and other non-credit programs for adults, the funding is from different ministries, as well as federal LINC funding. 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. The GSN funding for these programs must also be increased.

11. Review and Overhaul of GSNs. A comprehensive, expert panel that includes members from all stakeholder groups should be convened to conduct a review of the GSNs through 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.