Introduction

The Ontario Secondary School Teachers’ Federation (OSSTF/FEESO) welcomes the opportunity to provide input into the Ministry of Citizenship and Immigration’s Review of Ontario’s Non-Credit English/French as a Second Language Program.

OSSTF/FEESO represents 60,000 educational workers across Ontario including public high school teachers, occasional teachers, educational assistants, continuing education teachers and instructors, psychologists, secretaries, speech language pathologists, social workers, plant support personnel, attendance counsellors, and many others in education.

Among our members, we represent a number of bargaining units across Ontario which include Adult Non-Credit English as a Second Language instructors. These members are dedicated professionals who are passionate about providing high quality programs which meet the needs of the ESL learners in their classes.

When we presented them with the opportunity to provide input into the questions that this consultation poses, they were eager to do so, and so this paper compiles their input and OSSTF/FEESO’s positions.

The Ministry of Citizenship and Immigration has identified the purpose of this review as the desire to establish a more coordinated, results-based program that responds to the full spectrum of learners’ language training needs. The five objectives that the Ministry has in this regard are:

1. To improve access for learners;
2. To establish and implement an outcomes-based program with standards and an accountability framework;
3. To respond to language training needs for labour market success;
4. To coordinate and integrate with the federal language training program; and
5. To support flexibility in funding and program design.

Each of these five areas is addressed separately in this submission.
Objective 1: To improve access for learners

- What types of language training programs should be offered to ensure learners receive the training they need to improve their success in the workplace?
- What kinds of partnerships with employers and others could be established to support learners’ ongoing development of language skills necessary to meet their employment goals?
- How do we move forward to ensure learners receive the language training they need to find and retain jobs in their field?

A centralized website and regional booklet would be helpful in providing accurate information to newcomers. Newcomers rely on family and friends when possible to do research for them on available programs. However, if the information regarding available programs could be compiled in one central medium, it would be easier for learners to access the relevant information. A website similar to the MLS site for real estate which has you click on a region in Ontario could list available programs in the area or links to such. If a paper booklet (also organized by region) were to be compiled, it would need consistent updating and would be most beneficial in multiple languages.

Print material, such as booklets, flyers or advertisements, need to be available in locations such as the schools where their children are enrolled, libraries, grocery stores, hospitals and through community-based organizations which focus on assisting newcomers—for example, community centres, cultural organizations, churches, mosques.

It is best to use “ESL” to describe the programs rather than fancy or wordy names. Newcomers know they want ESL and describing programs as something else may simply confuse them or worse, pass over them completely because they don’t realize they are actually ESL.

Assessment Centres should be using one set of qualifications for assessors, one form (currently some use short form CLBPT and some use long form CLBA) and be trained (certified) by the CLB trainers. The standard set by the Canadian Language Benchmarks is that an assessor must have years of classroom experience to understand the curriculum and benchmarks prior to receiving the training to be an assessor. The assessors, once trained, then need to certify by doing assessments under an existing experienced assessor.

In addition, these assessments and the training necessary to be able to do the assessments need to be fully funded; at present, current ESL funding does not cover assessment and therefore it is either not done, or inconsistently done across the province since it is costly and
cuts into other program needs. (The funding issue will be more thoroughly addressed in part 5 of this submission.)

In order for students to identify their social and economic goals, they need to have familiarity with the reality of how long language acquisition takes, and how long and expensive foreign credential evaluation is. A newcomer’s goals 6-8 months after arriving in Canada may be quite different from the goals they originally hope to attain.

Centralized assessment centres need to be available in all major centres. At present, there are very few such centres and only in the largest cities. Literacy support, smaller class sizes for students in small centres and benchmark specific, skill specific classes would assure broad availability, and consistency of services. It is often the instructors in the classrooms who become aware of emerging local language needs and so there needs to be a way for two-way communication so that these emerging needs can be addressed. The resource of instructor knowledge is seldom utilized and yet, they are the ones who would have the best suggestions regarding programs that would benefit their students.

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<th>Objective #2: To establish and implement an outcome-based program with standards and an accountability framework</th>
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<td>- What minimum standards (e.g., learner eligibility, instructor certification, alignment to Canadian Language Benchmarks) should be established across the province to ensure the needs of learners are met?</td>
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<td>- How should we ensure consistency and quality in terms of all newcomers’ learning experiences and outcomes?</td>
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<td>- How should we measure and report on the effectiveness of language training programs in order to share best practices and successes to continuously improve these programs and newcomers learning experiences?</td>
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<td>- How often should program delivery results (e.g., attendance, financial, performance) be reported?</td>
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<td>- What must be done to ensure that program flexibility is maintained while greater consistency in standards and improved accountability is established?</td>
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At present, there is no consistency across the province in terms of intake assessment, curriculum, and outcomes testing. Some ESL programs use the Canadian Language Benchmarks, some the Canadian Language Benchmarks Placement Test, and some none at all because it isn’t funded. However it stands to reason that standardization would allow students to move
seamlessly from one program to another, or from one geographic location to another. Further, whatever standard is adopted, it should also be consistent with that used in federally-funded LINC programs, and sufficient funding must be provided in order to allow all programs to train and providing ongoing in-service in whatever assessment standard is chosen.

Whenever possible, classes should be skill specific—for example, a Benchmark 6 class available in Writing/Grammar, or Benchmark 5 class in Listening/Speaking. Each skill and Benchmark should be delivered separately whenever possible. Wherever possible, multi-level classes should be avoided because that makes the program harder to deliver effectively.

In terms of learner eligibility to take language training classes, there is a discrepancy between the requirements of ESL and that of LINC. This needs to be addressed because it creates a two-tiered system. At present, eligibility is wider and more accessible in ESL programs but the funding is minimal, whereas the LINC programs are far better funded but significantly fewer learners can access it because of its eligibility requirements. To have consistency of access and quality, ESL funding must be increased. At present, many locations offer blended programs of ESL and LINC, but it is our understanding that federal rules require that this practice be discontinued and this will put many ESL programs at risk of closing since they will be unable to afford them. If the intent is to provider wider, more consistent, higher quality programs, then ESL funding must be significantly increased.

TESL certification should be the recognized standard in this group of professionals. In addition, it is critical that such training or upgrading be supported with professional development funding that can be accessed by the instructors. Again, at present, ESL funding does not include provision for professional development.

Best practices and successes within a school board or geographic location are best shared when instructors are provided with paid time in order to do so. Best-practices and successes across the province are best shared through access to opportunities to attend conferences such as the annual CESBA and TESL conferences to name a few examples. Again, instructors need access to funding in order to do so to offset the costs of time-release, registration, and travel expenses.

Statistics on usage of the programs, success of the students in terms of benchmark progress and attendance should be reported regularly. Many ESL programs are full or over capacity simply because the funding is inadequate and the only way to run them is to have large and/or multi-level classes. Further, at present, there is no way to track attendance or progress electronically; registers are still filled in by hand for submission. Some very comprehensive locally-designed systems have been developed however. It would serve the Ministry well to research these and develop a system that takes advantage of the best features of all of them.
and then provide it for the use of all Ministry-funded ESL programs. In this way, learners who move from one part of Ontario to another will be better served in that their records can be transferred and the continuation of their programs from one jurisdiction to another will be more easily facilitated. Rather than have to undergo another assessment in the new location, their records would provide the necessary information to the new school board.

Programs are effective when they can adapt to growth. Offering classes at different times of the day, and assessments at different times of the day make the programs more accessible to learners. Offering a variety of programming which includes citizenship classes, skill specific classes, employment focussed classes, language for specific professions, language in and for the workplace, resume, cover letter and interview workshops as facilitated through other agencies etc. make the variety of goals students hope to achieve more attainable.

In addition, programs must have access to well-resourced locations, current materials and functioning equipment, including computers, software and the internet. Learners need to have access to functioning and up to date computer labs and to a variety of print and electronic resources in order to take full advantage of the language training.

**Objective #3: To respond to language training needs for labour market success**

- *What types of language training programs should be offered to ensure learners receive the training they need to improve their success in the workplace?*
- *What kinds of partnerships with employers and others could be established to support learners’ ongoing development of language skills necessary to meet their employment goals?*
- *How do we move forward to ensure learners receive the language training they need to find and retain jobs in their field?*

At present, according to information shared at the consultation session, there are 21 school boards across Ontario delivering over 50 Specialized Language Training pilot projects. However, in some cases these were developed and implemented without the input of the bargaining unit which represents the instructors. Where these programs are continued, or where new ones are planned and implemented, it is absolutely essential that the input of the bargaining unit is sought and that the programs are implemented within the collective agreement provisions of the unit. It serves no purpose, and in fact works at cross-purposes, if the bargaining unit is bypassed and the collective agreement ignored.
In addition, at present, ESL programming focuses on only language acquisition however there a wide range of skills also necessary if English language learners are to be integrated into the workforce. ESL funding needs to include provisions for things such as career counsellors who can assess readiness for the workplace, and for specialized training in job skills and other kinds of certifications such as WHMIS, CPR, Smart Serve etc.

Many immigrants face a lack of recognition of previous education and professional credentials which in turn causes an employment barrier. While language acquisition specific to their previous profession or trade is essential, so are opportunities such on-the-job training, cooperative education opportunities, workplace mentoring should be considered. Coordination with programs like Ontario Works and Employment Insurance are critical; wage subsidies and incentives to employers to implement such programs would be useful.

In addition, the language training itself needs to take into account the differing levels of education previously achieved by the learner, and not just their current benchmark. Serving the needs of two learners at the same benchmark is vastly different if one has a university education from his/her previous country and the other little or no formal education.

Here again, coordination with other kinds of adult programming within a school board would be useful. Learners need to know what else, beyond just language training, they can access in terms of adult education within a board. For example, they may also need literacy training, or special education services, or may want to go on to credit programs once they have achieved sufficient levels of language proficiency. Of course, this information also needs to be available to the instructors themselves, so that they can assist their students to access them.

**Objective #4: Coordinate and integrate with the federal language training program**

- Where are there opportunities for better coordination between, and integration of, language training programs funded by the federal and provincial governments and what benefits could be realized?
- How could learners benefit from improved coordination with the federal programs?
- How can we ensure that the language needs of all learners continue to be met as we coordinate and integrate provincial and federal language training programs?

Students should be able to move from one program to the other as their learner eligibility changes without noticing differences quality in terms of facility and resources and such things as child care and transportation subsidies.
At present, that is not the case. At the consultation session, participants told of instances where for example, they had to tell learners that since they did not meet the eligibility requirements of the LINC program, if they wanted to continue taking ESL they had to go to another location, and often that other location was farther away or in a less desirable facility without access to computers or other resources.

Where blended classes were offered, when ESL students compared notes with LINC students, the discrepancies became glaringly apparent especially where the LINC students, for example, would receive bus tickets and child care, and ESL students did not. There was also indication that in future such blended classes would not be allowed to continue and this may have the effect of denying language training services to students who do not qualify for LINC classes any longer and where the board cannot afford to run small classes of ESL because of lack of funding.

Objective #5: To support flexibility in funding and program design

- What are the strengths and challenges with the current funding approach? How could it be improved to ensure learners’ needs are met?
- What types of innovations / program improvements could be considered and are there any barriers to implementing them?
- What approaches can be taken to address local language training service gaps?
- What more can be done to ensure language training programs are learner-focused?

There are many challenges and differences with the current funders. LINC funding is administered federally and it covers a wider variety of necessities for a successful program.

For example:

- ESL funding has no provision for assessment; LINC funding does.
- ESL funding has no provision for facility or maintenance costs.
- ESL funding has no provision for professional development of instructors.
- ESL funding has no provision for child care while their parents take LINC classes.
- ESL funding has no provision for transportation subsidies for learners.
- ESL funding has no provision for fieldtrips.

As a result of these funding shortfalls in ESL:

- ESL students often pay a consumable fee, LINC students do not.
• ESL students have classes in inadequate locations, without access to libraries, computers, and other resources necessary to take full advantage of their language training.

Because of these discrepancies in funding by the two levels, there is, as mentioned earlier, a resulting discrepancy in the programs available to the learners, and often richness of experience, and possibly variety. Where boards do provide some of these despite the funding shortfall, it is at the expense of optimal class sizes: very often ESL classes are too large and/or have too many levels within the same class and this can affect the quality of the program the learners receive.

To remedy this, ESL funding must be sufficient to fund the same kinds of aspects to delivering programs that LINC does, especially since the learner eligibility requirements are wider for ESL than for LINC so that students can move from one program to the other as their eligibility changes without having to forego quality in terms of facility and resources and such things as class size, individual classroom attention, and child care and transportation subsidies.

Since many school boards are in a declining enrolment situation and may have unused space in schools, there needs to be a way for school boards to use that space for adult education. However, many boards say they cannot do so because they do not receive an accommodation grant as part of adult continuing education funding grants, whether that be for adult ESL, literacy or credit programs. This is a major barrier and so coordination with the Ministry of Education is essential to address this issue.

Further, allowing adult continuing education to have access to unused space in existing schools also ensures access to actual educational facilities (as opposed to church basements or community centres) with access to computers, software, internet, libraries, and other resources.

**Conclusion**

Finally, language is for use in life. Sometimes it needs to be academic and other times it needs to be practical. Just as work requires employees to have supports in place in terms of childcare, emotional and physical health, so too does language acquisition. Students are often arriving from extreme hardship (war, atrocities, poverty) and other times they are arriving by choice but suffering from isolation and adaptation challenges. Newcomers are being crushed by the immigration process. They are unable to find the supports necessary to facilitate success.
Language is a basic necessity of life like food and water. If newcomers cannot effectively communicate, they cannot thrive. However, it is difficult to offer newcomers the classes they need if school boards continually need to struggle to find and keep classroom space because of inadequate funding.

Further, survival is no longer the only goal of newcomers, they also want to become active and contributing citizens of their new country, but in order to fulfill this desire, they need not only consistent access to language services which are sufficiently funded but also settlement workers, childcare, family doctors, and very often social and emotional support or counselling services.

OSSTF/FEESO believes that the goals of the Ministry of Citizenship and Immigration in this review are laudable and important to the continued success and enhancement of ESL programs across the province. We also believe very strongly that school boards are uniquely situated and best able to fulfil all of these goals and deliver the highest quality programs, and to provide access to many of the supports that newcomers need, but they cannot do so without sufficient funding regardless of whether that be federal or provincial funding.

Once again, OSSTF/FEESO appreciates the opportunity to participate in this review and to contribute to the enrichment of the adult non-credit ESL programs delivered by school boards in the province.