2018-19 Education Funding

DISCUSSION SUMMARY





Each year the Ministry of Education engages with a wide range of education partners, covering a number of topics with the aim of prompting discussion around both recent changes in funding as well as looking for direction on future considerations. This document reports on the responses received, both in person and via submission for the 2018-19 school year. As in previous years, participants were encouraged to raise any other issues of concern to them.

Engagements were held with the following groups:

- School board representatives, including Directors of Education and Senior Board Officials;
- School board trustee associations;
- Principal and Vice-Principal associations;
- Teachers' federations;
- Education worker unions;
- The Minister's Advisory Council on First Nation, Métis and Inuit Education Working Group;
- Indigenous Trustees' Council;
- First Nation Lifelong Learning Table;
- · Parent groups; and
- Student groups

As in previous years, the discussions looked at core areas of funding, which are collectively known as the Grants for Student Needs (GSN), and at funding through Education Programs – Other (EPO). For 2018-19, areas of special focus were:

- Learning Opportunities Grant
- Indigenous Education Grant
- Pupil Accommodation Review Guideline (PARG) / Community Planning and Partnerships Guideline (CPPG)
- Early Years Capital Accommodation Costs
- Accountability Measures and Technical Updates, including:
 - New Teacher Induction Program
 - Lead Funding
 - EPOs
 - Identifying Efficiencies and Reinvestments

A summary of the discussions follows. Questions under each topic heading have been summarized and/or condensed. The full questions and technical background were available in the engagement guide, which was provided to all participants before and during the engagement sessions.

Learning Opportunities Grant (LOG)

Should all LOG allocations be enveloped?

There was a widespread sense among boards and some others that LOG was increasingly being enveloped by individual allocation. These participants expressed a preference for less enveloping in most situations, including LOG components, because it restricts board flexibility, creates silos and imposes more reporting requirements. Parents, Indigenous partners and other education stakeholders, however, felt that accountability was best ensured by enveloping. This was felt to be especially important in areas such as mental health, literacy and math, and the Specialist High Skills Major program.

There were questions regarding whether Local Priorities funding would be permanent or not, as this was part of the last round of collective bargaining. Boards also questioned whether LOG was the most appropriate spot for this to be included.

Boards felt that it was difficult to report separately on each component within LOG. The LOG may be supplemental and cover incremental costs as opposed to entire programs, making it difficult to report on each component or have them enveloped.

As well, some boards and other participants felt that the LOG funding is insufficient, and additional needs must be met from other lines of funding. Mental health was cited as an area of particular need. Some participants, however, cited research suggesting some boards diverted funding from at-risk students to other needs.

Other stakeholders, including some boards, felt that what is needed for LOG is greater clarity around what the grant should be used for (and how it is calculated) and greater transparency in boards' reporting on how it is spent. One suggestion was for an expert panel review of all aspects of LOG funding. Another was that the ministry consult every year with teacher representatives at each school board on locally-determined program spending.

Are there any other components of LOG that need to be updated, and how?

Many participants felt that LOG includes too many components and needs to be reorganized and streamlined. As well, because the description of LOG and its purpose is vague, it is subject to varying interpretations. One view was that LOG had moved away from its original intent of tying extra funding to greater risk of under-achievement, and had become more of a catch-all for grants that don't easily fit elsewhere. One board noted that at-risk used to mean the student

might not complete secondary school; but with more students graduating now, the definition may need to be clarified. (See also comments on grant structuring, below.)

One suggestion was to better integrate funding across grades, because parcelling out funding by grade (especially with more restrictions in earlier grades) creates silos and makes it hard to be innovative, integrated or strategic. It also works against a seamless public education system.

Specific components on which participants commented included:

- The mental health lead allocation. This needs to be more flexible, as currently
 it can be spent only on salaries and benefits, and an administrative component
 (10% was suggested) should be added. There were also concerns about the
 ability of this lead to respond to the needs of Indigenous students, especially
 those whose tuition is paid by the federal government.
- Library staff allocation. This grant should be added to the Pupil Foundation Grant, along with other library staffing, many felt. Some also said that it needed clarification, as many schools (unless very large) hire library technicians or teacher librarians instead of dedicated librarians, and boards need to know if such resources are considered "library staff." Moreover, the focus on salaries is outdated as information increasingly moves to digital platforms. Board consensus was that if this funding remains in LOG, it should not be enveloped. Another organization said that there should be enough funding for a minimum of one library technician in every school.
- The Local Priorities Fund. Any staffing portion should not be in LOG, as noted above; but it was suggested that there should be a "small pot of money" for local priorities unrelated to staffing.
- Outdoor education. It is offered to all students, which makes it difficult to
 tease out how much funding is specific to "students at risk". It was suggested
 this grant should be moved out of LOG. One board with its own outdoor
 centre noted that a requirement to use funding for third-party services
 worked against them using it effectively. Another board said they were
 consistently underspent on this grant because of cultural shifts that made
 parents unwilling to let their children be away from home overnight.

Several participants mentioned the Equity and Inclusion initiative. LOG currently does not include funding for a lead in this area. Adding funding for this role would alleviate pressure from having non-dedicated staff perform these duties.

Demographic allocation

Are the socio-economic indicators included in the calculation for the Demographic Allocation appropriate?

Boards identified the following as strong indicators of students at risk of low academic achievement:

- Parent(s) with low educational achievement (one board found this to be the single most important factor; another said mother's education level was a better indicator than both parents')
- Only one parent/guardian in the household
- Frequent moves and/or homelessness
- Parental fitness (addictions, mental health, family violence)
- Refugee status
- Student living on social assistance
- Student in care, or in non-traditional home settings (such as living with grandparents)
- Language other than English or French spoken at home (there was a suggestion for a specific francophone component, as well)
- Unemployment rate
- Low graduation rate
- Local problems with drugs
- High number of families on social assistance

It was suggested that the formula might need to vary by region or by rural/urban context. A board in a remote area, for example, raised the issue of student inability to access high-speed internet and the scarcity of other services like child care. Another board noted that the low income element does not necessarily capture the reality of people living on farms or other remote settings. Conversely, remote areas tend to see less immigration, which is currently included in the calculation of the demographic allocation.

Even in more populated areas, many participants noted that, except in the case of refugees, recent immigration does not correlate strongly with the need for additional support and in fact many recent immigrants are higher achievers than their Canadian-born classmates. There was agreement that language spoken at home would capture a wider spectrum of students, including some Indigenous ones.

One board suggested that participation in early years child care might help offset some risk factors, but research would be needed to confirm this.

Some participants noted that the Indigenous component of this grant was removed when the ministry created a specific Indigenous education grant. Many felt that the new grant, however, does not address as explicitly the risks facing these students, and that an Indigenous component should be put back into LOG.

Several boards have carried out their own research into the factors that correlate with under-achievement, which the ministry invited them to share. One large urban board, for example, has developed its own "learning opportunities index" to allocate LOG funding by school. Some participants thought it would be useful for the ministry to provide the funding by school where the board lacked the resources to carry out this work.

There was discussion of the need to update demographic data to reflect the 2016 census as soon as possible. In one session, it was suggested that demographic data from the Ontario School Information System (OnSIS), which boards collect more frequently, might be more useful. This would also get around the problem that postal code-level data does not always match a board's population. Other suggested data sources included:

- the Early Development Instrument (EDI)
- the Local Health Integration Network
- local police
- the public health unit
- university researchers
- information from other ministries, such as Community and Social Services
- community data from the Canada Council for Social Development that the United Way (among other organizations) uses.

Some boards felt that the indicators were adequate but the weightings might need to change, in line with research and evidence. Others suggested that refugee status, if it replaced recent immigrant status, should be weighted more heavily, as should single parent status.

Indigenous Education

Is enveloping the per-pupil amount effective in assisting boards to support programs and initiatives aimed at improving Indigenous education?

Enveloping funding was widely felt to have helped improve attitudes and outcomes. Numerous boards pointed out they were already dedicating funding toward Indigenous education before enveloping was put in place.

There was also recognition that even with enveloped funding it will take time to fully align programs with goals, build trust and change the culture.

Many Indigenous participants expressed a wish for Indigenous communities and organizations, for example local advisory councils, to have more say in how boards use funding for Indigenous education. They also noted the need to align with Truth and Reconciliation commitments and such initiatives as the Master Education Agreement recently signed by the ministry and the Anishinabek Nation. They expressed some skepticism about the value and effectiveness of some board action plans on Indigenous education, and how well board accountability in this area is being ensured, especially in terms of aligning with the ministry's *Ontario First Nation, Métis and Inuit Education Policy Framework*.

Some made the broader point that the ministry's desired outcomes from the funding aren't clear. The tension between whether the funding was supposed to be directed mainly at Indigenous students, or used to support all students in their understanding of Indigenous issues, was also raised.

Updates to the Lead position in 2017-18

Funding now includes an amount to be used to support a dedicated lead for Indigenous education.

Indigenous participants felt that leads have been placed at the intersection between board and community interests. While they felt that productive conversations were happening around the leads, the funding did not guarantee accountability to Indigenous communities. There was also a concern that without clear understanding of what they're supposed to do and allowed to do, leads can be pulled in too many different directions and become frustrated. One suggestion was that leads should get together to share best practices; Indigenous groups expressed interest in delivering training to these gatherings, especially in the area of cultural competency.

Some boards were already funding an Indigenous lead. While in some cases the ministry's new approach has provided additional funding for the lead position to be at the Supervisory Officer level, at least one board said the change had not increased its funding and had reduced its flexibility.

There were concerns in the Indigenous community, however, that in some cases the Indigenous lead was not held in the same regard as other board officials. One board said that the ministry's communications were unclear and "gave the impression that the lead can sit with supervisory officers at the executive table."

Some participants expressed concerns that not every board has hired the dedicated lead.

One board noted that the Indigenous lead crosses into the Equity and Inclusion initiative, which creates issues for the enveloping. (In other conversations, a cross-over between equity and accessibility was also mentioned.) In some boards, the Indigenous lead works closely with the board-funded equity lead.

How successful has the lead been at working with the community? What aspects of the Indigenous education framework have benefited from hiring a dedicated lead? Are the lead's names and contact information publicly available on the board's website?

Board responses as to the role of the lead varied, depending on location and make-up of the student population among other factors. Boards did not always differentiate between achievements related to the lead's role and progress supported by enveloped funding.

Examples of how the initiative is being advanced included:

- sharing information, supporting educators, building awareness, and using data to support student achievement
- providing cultural competency training to all board staff
- setting up Indigenous artist/speaker rosters
- having booths at board and community events
- engaging with communities through drum socials, pow wows, and an Elders Council
- having an orange shirt day at every school in one board
- inviting indigenous speakers to schools
- naming a school after an indigenous folk hero
- creating stand-alone Indigenous studies schools/sites; in one case, a key function is to emphasize land-based learning and encourage Indigenous students to share their knowledge with visiting students from other schools
- using Indigenous greetings and a land acknowledgement on the board letterhead
- building Indigenous studies into course offerings, for example by making grade 9 art "Indigenous art" with no other option.

Indigenous participants were concerned that boards needed to recognize engagement had to be serious and ongoing – a frequent concern was "flash-in-the-pan" or "one-off" activities that failed to continue the message and learning once the activity was done. They also cautioned against incorporating activities like making wampum belts into courses because these have a sacred role in Indigenous life. They noted that many Indigenous teachings take place on the land and are passed from one generation to the next. Even where land-based teaching happens – and it is by no means common – without the right person teaching, this aspect is lost and the experience is not authentic.

While the lead's contact information was available on many board websites, the level of awareness in the broader community was generally unknown. (This lack of awareness might also include school staff: one teacher in a school in an Indigenous community was called directly by teachers in the nearby provincially funded system to visit their classrooms. While outreach is important, the teacher noted, the lead should be brought into these discussions to coordinate and make it more effective.) Metis participants expressed a view that few leads had contacted their communities.

An Indigenous participant noted that the lead in their area used social media very successfully to engage with the community, and suggested this as a best practice for others.

A point made in both board and Indigenous sessions was that the lead is a board representative, not a representative of Indigenous communities. It's therefore still important to have indigenous partners at the table.

There was also discussion of whether the lead (as well as other school staff) should be Indigenous. One board said that hiring a lead from one of their First Nations partners might make it difficult for that person to deal with other Indigenous partners. At a minimum, Indigenous participants felt, an elder or other representative of the community should be involved in the hiring decision.

Should the class size benchmarks for funding Indigenous languages be changed? Why or why not? If yes, what should the new benchmark be?

Again, responses varied widely. In the north, many students come from a community where an Indigenous language is spoken day to day, which boosts enrolment and demand for higher-grade-level courses, including up to Grade 12. In the south, the situation is more complex. Some Indigenous communities have their own classes, reducing demand for board-offered courses. In other places there are not enough Indigenous students to drive demand, but sometimes non-Indigenous students make up a larger share of the class. Other boards said their ability to meet demand was limited by the availability of qualified teachers.

In boards with compulsory religious or language studies courses, it was noted, it is difficult to fit Indigenous language courses into the curriculum. A participant felt that a challenge for francophone boards is finding appropriate materials written in French from an Indigenous historical perspective, not just translated from English, which may also hamper the uptake of Indigenous studies in those boards.

On what the benchmarks should be, there was a range of views. One board said there had been discussion of going back to a funded benchmark of eight students per class, but that this was not workable because having one teacher with 30-plus students and another with such a small number created tension. Small boards commented on the difficulty of reaching the existing thresholds because their student population is so low to start with.

One board recommended class sizes of seven students for Indigenous languages and 20 students for Indigenous studies. This board felt courses should continue to be funded through this grant to provide greater visibility. Another participant suggested benchmarks should be higher.

It was suggested that some indicator other than class size be developed, or that a tiered benchmark for different regions might be useful.

In the indigenous engagements, participants noted that while increased interest by non-Indigenous students in Indigenous studies courses was beneficial, funding for those courses is becoming less focused on the education of students from their own communities. It was also thought that some boards may be using Indigenous studies funding generated by the low threshold to support other programs.

A number of participants suggested that funding for Indigenous studies courses should be moved into the Pupil Foundation Grant, that at least one Indigenous studies course should be mandatory and that Indigenous teaching should be less disjointed from one grade to another.

Moving Indigenous studies into the Pupil Foundation Grant would provide more funding for Indigenous languages, allowing for smaller class sizes, and for elementary schools. Boards with larger populations of Indigenous students tended to agree with this proposed shift in funding arrangements.

First Nations representatives questioned why students whose costs are funded under an agreement with the federal government or band are not counted toward the class size threshold, especially for languages. A board with a high proportion of First Nations students noted that it lost money because of its commitment to language courses and suggested an alternative calculation that would cover the needs of all interested students, regardless of how their attendance was funded.

They also had concerns about the fact that many people fluent in Indigenous languages do not have Ontario teacher qualifications (although boards can hire teachers with special letters of permission). A board made the point that even if a teacher had the language skills to teach an Indigenous language, they might want to teach a different subject for advancement reasons.

A board noted that there needs to be more flexibility in Indigenous language funding to address the complexity of dialects and plethora of languages. An apprenticeship or summer program in a board would be useful, a participant said, to help develop language speakers who will be qualified to teach these courses, and those teaching should be paid the same as other teachers. Another suggestion was a summer-time immersion-type program, possibly combined with on-the-land teaching.

Several participants expressed the view that there should be recognition of Indigenous language rights similar to those for French (one participant noted that the recent federal commitment to fully implementing the UN Declaration on the Rights of Indigenous Peoples and the recommendations of the Truth and Reconciliation Commission would help advance this). This would also create more demand and a more secure career path for Indigenous language teachers, providing an incentive for more to become qualified. It could also help direct a language revitalization strategy.

Metis and Inuit participants wondered why their languages were not covered by Indigenous language funding. The need among Inuit students is especially critical, a participant said, because of the culture shock of moving south from their home communities in the Arctic. Their numbers are both small and scattered, however, which would make it hard to meet current class size benchmarks even if the language were taught.

Other Indigenous issues

Many participants recognized the need to ensure that all staff in schools, not just teachers, have the capacity to welcome and support Indigenous students. Some called for compulsory training to support this goal. There was also discussion of the importance of taking a team approach and incorporating the recognition of Indigenous rights into the curriculum.

Visits between Indigenous and non-Indigenous schools and communities were cited as a best practice in building trust and knowledge. As one participant put it, "Teachers need to know about the communities their students come from. Each region is very different. Going hunting or tending a trap line – this is part of a way of life. This understanding is missing. Get to know the student and their parents." (It was also noted that this would help schools in the provincial system better understand attendance patterns among Indigenous students.)

There was discussion of the fact that boards don't know the level of their tuition agreement funding when budgeting, so cannot effectively include it in their planning. This means, some felt that some boards see it as extra money that is not always directed to supporting the students it funds. One Indigenous participant said that they did not like the term "tuition agreement student" as a result because "it just puts a dollar sign on that student's forehead."

At one session with boards, numerous questions about the fairness of tuition agreements were raised. A key one was why the system treats international education students and Indigenous students the same in terms of requiring tuition fees. This caused problems in explaining arrangements to the Indigenous community, especially because international education students are seen as a business, while Indigenous students should not be. Students attending under a tuition agreement also expressed doubts that they were truly able to access all the same supports as other students.

One board expressed frustration with discovering, after developing a summer program to be delivered to Indigenous students in their own community, that the ministry would not fund it because the students were covered by a tuition agreement and therefore not pupils of the board.

The New Teacher Induction Program (NTIP)

In order to close the support gap, should four-month (80-day) Long-term Occasionals (LTOs) be eligible to participate in the induction portion of NTIP? Why or why not?

Boards and many other participants agreed this would be beneficial. One board suggested funding might even be available for teachers on shorter-term contracts, because these often end up as 80-day or longer engagements.

It was noted, however, that carrying out assessments of teachers on shorter assignments would add to principals' workload and might reduce teacher accountability. One board noted that keeping track and putting support in place for eligible teachers might be challenging because it isn't always clear at the start that a teacher's assignment will run 80 days.

Some boards also mentioned that it could be difficult to use all of the NTIP funding they already receive because there are not enough supply teachers to cover in classrooms when teachers are released for the NTIP program.

Should boards have the flexibility to use NTIP funding to support teachers in their first five years with assignments outside of NTIP's current mandatory eligibility? Why or why not?

If yes, what type of teachers should be eligible to participate? (For example, teachers with multiple LTO contracts, daily occasional teachers, teachers on short-term contracts?)

There was strong agreement that the current model was not designed for new teachers working the way they do now, often with a series of occasional teacher assignments that can stretch over several years. Until the model is updated, many felt that boards need flexibility.

There was varied opinion as to whether boards should be investing in teachers with considerable occasional experience once they become permanent. Some boards felt that by that point they really don't need the support, although others disagreed. One board said some teachers with many years of occasional teaching surpass the grid for NTIP support, but the board funds them itself because they feel it's important.

Some noted that there is a lot of migration among boards, especially in south-central Ontario, which makes it hard to identify which teachers are truly new to teaching. It is also difficult to track contract placements.

Some boards were concerned about occasional teachers working in more than one board, as they would receive NTIP training more than once, which is costly, although others felt the additional sessions might be useful.

Several boards noted that they already support teachers who are outside NTIP criteria.

The types of teachers and other staff who were mentioned as good candidates for a more broadly defined NTIP included:

- Teachers with multiple LTO contracts (but one board said no to this, as it would be hard to track)
- Teachers who are transitioning (for example, moving from teaching Grade 3 to Grade 8)
- Special education and kindergarten teachers
- Technology teachers, because of the inability to meet demand caused by retirements
- In southwestern Ontario, teachers of low German, which is spoken by the Mennonite community
- Indigenous language teachers, including those on letters of permission

- New principals and vice-principals
- Teachers wanting to qualify as a principal/vice-principal
- Mid-career teachers, to enhance professionalism
- Early childhood educators
- Educational assistants

It was suggested that the program might be offered on an "opt-in" basis in at least some of these cases. Another suggestion was that there should be criteria to help identify teachers who would benefit the most.

Should boards have the flexibility to use NTIP funding to direct extra support to FFL/FSL teachers, who are in high demand and often land permanent work immediately following graduation?

Several participants said there is a crisis in Ontario relating to French teachers and the solution needs to be bigger than simply redirecting NTIP funding. Because of demand, many student teachers qualify to teach French so they can get a job more quickly. Once in the system, however, they ask for a transfer to a regular classroom, and boards often have concerns in any case about their competency.

Many boards agreed that FFL/FSL teachers may require even more than two years of funding, because of their lack of "on the ground" teaching experience. There was also a suggestion that more mentorship and/or higher salaries might help build their commitment to teaching French.

One organization, however, felt that NTIP funding should be restricted to its current target group and not used to support FSL teachers beyond current requirements or post-NTIP teachers.

Other comments

It was suggested that NTIP should include Indigenous cultural sensitivity training.

A board suggested using current-year data to calculate the NTIP amount, as opposed to the existing practice of using data from the previous year.

Another board wondered about the effectiveness of funding. There are now so many PD days, new initiatives and approaches that "it's like a new operating system every month." Some participants suggested the focus of PD days should be driven more by boards and teachers and less by the ministry.

Leads

Should all leads be dedicated?

More than one board suggested that instead of a focus on designating leads, the ministry should define the outcomes that boards need to achieve. This would shift the discussion to showing the outcomes achieved instead of the dedicated positions funded. Accountability would come from boards having to prove that their activities results in improved outcomes.

If that is not possible, boards had several suggestions for improving the current approach:

- allow flexibility in student achievement funding to support additional mental health leads;
- pool all lead funding and let boards decide how to allocate it;
- provide more funding for board administration to support the increasing number of leads.

Despite the interest in pooling or other increased flexibility, the value of having dedicated mental health and Indigenous leads was recognized.

In some cases, one board noted, teachers or principals might fill lead roles effectively. Another said, however, that this had led to labour disputes around what is teacher/principal work and what is lead work. As well, many participants felt that having a teacher or principal try to also juggle a lead role causes one role or the other to suffer.

The ministry's language that leads are "Funded at the Supervisor Officer (SO) level" appears to be a source of confusion, as it seems to suggest to some boards that the lead must be a Supervisory Officer. Boards identified a need to clarify the meaning.

Should all leads be limited to a full-time equivalent (FTE) that can only be held by one individual?

For boards in areas of long driving times and where the funding is available, it might be better to divide the role between two people, each one covering a different geographic area. Each person could then have two 0.5 (half-time) lead positions (for example, Student Success and School Effectiveness). Participants generally favoured this approach, although some felt that having a single person responsible improved accountability.

Smaller boards asked for additional funding for driving time and costs where there is not enough funding for leads in different parts of their geographic area.

One board noted that the funding for the MISA lead is not enough for one full-time staff member.

Should funding for all leads be enveloped?

As in other areas, many boards argued for more flexibility. Other participants expressed the view that the funding for these targeted positions be enveloped to ensure that the program is effective and accountable.

Uniform benchmarks (such as one lead for each board) do not recognize the different circumstances of boards and are not always the best way to allocate funding, many felt. There was a view that if a lead had other responsibilities, then the full funding should not go to their salary, and boards should not be able to move the unused portion to another area.

For many boards, the benchmarks do not cover the costs of staffing these positions (while salary is covered, administrative and other costs are generally not). It would make more sense to provide a line for the program and have the board pay for the lead from within this line.

Are there additional leads that the ministry should consider funding directly?

- Special education (which some boards already have), particularly in light of the special needs strategy under development, but with flexibility around how staffing is organized
- Local priorities
- Labour market knowledge
- Autism
- Behavioural problems and resulting violence
- Equity and Inclusion / disability management
- Human Resources / Employee Assistance Program
- Quality daily physical activities
- Curriculum
- Science, Technology, Engineering and Mathematics (STEM)
- Math Strategy
- Innovation
- Rural education
- Renewal (for capital projects)
- Enrolment (because this drives most GSN funding)

There was a comment in one session, however, that the proliferation of leads with curriculum-related responsibilities is making it harder to develop strategic, integrated approaches.

One session raised the idea of a lead for Educational Programs, Other (EPOs), because of the extensive coordinating and reporting work involved, but others suggested a more effective approach would be to streamline and bundle more EPOs.

Are all leads currently fully utilized?

Boards felt that they are. Some boards in more remote areas noted that the number of times leads had to travel to Toronto for professional development was a problem and reduced their effectiveness. Some other participants felt leads were not all fully utilized. One board noted that challenges can arise when a lead has multiple roles, with some strategic and others operational.

Education Programs Other (EPOs)

Which EPOs, if any, should be moved into the GSN? How could accountability for those grants be ensured?

EPO items that already have reporting requirements through the GSN should be moved into the GSN, as should programs that have been in existence for several years. Examples included:

- Autism Supports and Training
- Board Leadership Development Strategy and Mentoring for All
- Community Use of Schools Leads / Outreach coordinators (already in GSN School Operations and Renewal Grant)
- Early Years Leads
- Equity and Inclusion
- Managing Information for Student Achievement (MISA)
- Mental Health
- Parent engagements
- Reengagement for Indigenous Students
- Safe, Accepting and Healthy Schools
- Specialist High Skills Major (already in GSN LOG)
- Tutors in the Classroom

Some felt that the Renewed Math Strategy should be moved, as it is part of curriculum and difficult to report separately, while others felt the program was too new to be moved yet and, with a planned three-year duration, its continuation was uncertain. (A related comment was that boards are struggling with the strategy, because better results decrease the funding, so boards feel penalized for improving outcomes. It was suggested that student population, not EQAO scores, should drive funding.)

One issue with EPOs that boards noted was uncertainty around availability in future years, which created challenges for planning important programs. In some cases, EPO funding was spent on changes that led to ongoing operating costs, but the funding was then cancelled. Boards also said they would like to see dollar figures in the annual "B memo," which comes out in the spring, instead of having to wait until later in the year for this information. It was also noted that because boards have to apply for EPO funds, small boards with limited staff resources are at a disadvantage and this creates inequity.

First Nations participants who dealt with tuition agreements were cautious about moving too many programs into the GSN, as it is used as the basis for negotiating the agreements and might push up their costs.

Boards felt that moving grants into the GSN did not reduce accountability, since boards are accountable for GSN funding. Others, however, felt that when a grant moves into the GSN, there is a loss of transparency, because calculations in the technical paper are too complex, and there tends to be less reporting.

Which grants should be moved out of the GSN? How could accountability for those grants be ensured?

There was no support among boards for moving grants out of the GSN.

Should additional portions of the GSN be enveloped? If so, which areas and why?

There was no support among board officials for more enveloping, except for administration. In one session, it was suggested that funding for principals and vice-principals be enveloped, but with flexibility for boards to spend it on individual schools as needed. It was also suggested that secretaries be funded through a separate line and the funding increased and enveloped.

Early Years capital

What operational costs should be included when calculating accommodation costs in schools? What shouldn't be included?

How can access and affordability to programs be improved?

What initiatives or policies should the ministry consider as it develops accommodation costs strategies for early years programs?

Boards identified these operating costs that should be included:

- Caretaking, especially since day cares often open before custodial shifts start
- Maintenance (for example, snow removal, garbage collection)
- Heating and lighting
- Security system
- Insurance
- Administration, including dealing with municipalities that subsidize spaces
- Higher costs for accommodating younger children/infants

There was some agreement around creating templates for calculating standard operational costs, either across the province or by region.

At present, different boards use different approaches, and operators tend to migrate to the board that charges the lowest rate. This can affect student enrolment as the child moves into school, because parents often stay in the same board. As one participant put it, subsidizing child care is an investment in the future.

On the other hand, many boards, especially with schools in areas struggling economically, said they have trouble finding operators and can't charge the true cost of accommodation. (One participant predicted that some boards will face financial problems in the long run as a result.) The impacts of differing costs and market conditions led to discussion about whether a uniform, province-wide model would provide equity.

One board shared its approach to developing an average cost per square foot on which it bases its charges for space in active schools. It includes both operating and depreciation costs of facilities, which helps to address the need to reinvest in the capital needs of facilities over time. The amount is recalculated each year to reflect inflation and other factors. (Another board said it has tried to set a five-year rate to give operators more certainty.)

In one region, the coterminous boards have established a uniform per-square foot lease rate that works effectively for all the boards. No matter the outcome of the Working Group on Accommodation Costs, they do not want their pre-established rate to change.

There were concerns that some costs (examples were damage, cleaning and supplies) resulting from operator use tend to come from the budget for the school. A suggestion was that all costs should be clearly spelled out in the agreement and the funds for school-specific expenses should flow to the school.

As well, where a principal's salary is based on the number of students in a school, children in child care aren't counted, even though this can add to the principal's workload. In some cases, principals are not told in advance that they are responsible for discipline, dealing with difficult parents, handling health and safety issues, and other matters. A best practice would be to ensure the Early Years lead at the board coordinates between the board and principals.

Many concerns centred on affordability and access. It was felt that the Ministry of Education had not factored in several cost drivers when taking child care over from the ministry that was previously responsible. It was suggested that the ministry should cover all child care operating costs or, at a minimum, those other than instructional supplies and labour.

Boards also asked if there could there be something like the Supported Schools model for before- and after-school programs, as outcomes are better with a model that includes these as well as child care. Data similar to that underlying the LOG might be used.

Boards also noted that the parameters around the Schools First initiative make it hard to find a community partner that qualifies and meets all the parameters.

Another emerging problem, one board said, is the increasing number of small, home-based daycares that can offer service at a much lower price.

First Nations participants expressed concern that services a child receives under Early Years programming must be paid for by the First Nation when the child moves into the school system. As well, they said that in some instances, families living in First Nations communities were asked to pay for child care that others received at no cost or a lower fee.

In developing an accommodation cost strategy, the ministry was advised to consider:

- The parameters of what the capital funding will cover
- Protection for the school's students to use school space, not portables, if enrolment increases

- The approvals/commitments expected. For example:
 - If the board invests capital funding, but the child care operation turns out not to be viable, is the board responsible for paying back the capital funding?
- The facility age, as older classrooms need extensive renovation to meet child care requirements
- The impact on costs of differing rules/regulations and differing hours/days of operation from the school's
- The need for culturally appropriate child care for Indigenous children

It was suggested that the ministry use an updated and more suitable benchmark for early years capital instead of the full-day kindergarten benchmark, which supports an average classroom of 26 students and does not reflect the more complex needs of child care.

At one session, participants suggested the ministry should provide guidelines and more support to help school boards with the planning process for Early Years, and that there should be better alignment among the relevant ministries around capital matters. (Several participants also noted that the costs of retrofits and capital projects generally, are coming in much higher than expected owing to the tight construction market in many parts of the province at present.)

Pupil Accommodation Review Guideline (PARG)

Do you think the ministry's proposed revisions to the PARG will create a stronger, more collaborative process?

There was widespread agreement that the modified review process was generally beneficial. Conversely, the current pause in closures was felt to have caused a problem for boards that now must continue to operate schools they want to close, adding to their costs.

There were mixed responses to the proposed changes, which would lengthen time lines, involve municipalities more fully, and bring community impacts back into the analysis, with most boards expressing serious concerns. These included the risk of less collaboration, an overly-long process, more conflict over possible options, and loss of a streamlined process in cases where there are no community concerns.

Many boards felt that if the process is too long, there is likelihood needed changes will not be made. Some felt that five or six months should be the maximum, and there were concerns about timing going beyond the length of the school year.

As one participant expressed it, "no amount of consulting is ever going to make school closures less painful"; another noted that "the process doesn't need to be longer, it needs to be better." Other participants had mixed views, with no strong consensus for a longer period.

There was some discussion of possible extension of timelines in response to pre-determined triggers that might change a school's viability (such as the municipality changing the zoning where the school is located), but school board participants felt it would be hard to define these comprehensively in advance. They noted that even a short delay can mean that a closure happens a year later than expected, with significant operating cost impacts.

There were some concerns about reforms of the administrative review process, including extending the timeframe to submit an administrative review petition from 30 to 60 days; most boards were opposed to this, but one suggestion was the possibility of asking for an extension from 30 days.

Most boards that expressed a view felt that presenting three options would be problematic, although a few others said they had no concerns. Those opposed noted that in some cases, for example in rural areas, three reasonable options simply aren't possible. In addition, if the status quo were a viable option, as one participant said, the board would not be undertaking a review; listing it as an option, even as a starting point for discussion, creates "a false sense of hope" for those opposed to the change. Many felt the process works better when the board makes a decision that it has to defend.

Boards also felt it should be clearer that program quality, not budget, should be driving decisions. Explaining in detail the benefits is important. They noted, however, that it is hard to define and quantify the impacts on students, as so many positive and negative factors – richer programming, longer bus rides, ability to take part in more extracurricular activities, anxiety around change – are involved, and the impacts across the student body are not uniform. (One participant, however, noted that in general "kids are always fine after a school is closed.")

Boards expressed the view that other factors, especially "economic impact," were less relevant and/or hard to quantify in a valuable, objective way. Others felt that impact on the community was a factor to consider, especially when the community is small and remote.

Some of these issues were felt by some boards to be made more complicated by involving municipalities. Elected municipal officials sometimes advocate positions contrary to the board's goals. Municipal involvement can also slow the process, and differing municipal and school board boundaries can complicate discussions. A concern was how municipalities should provide input (for example, it was suggested they should be asked to sign off on the board's direction before

the public process started). There was no support, however, for publicly naming municipalities that did not respond to invitations to take part in the process.

Many boards expressed an interest in a "pre-approval" step in which the ministry would make it clear that funding would be available for a new school (or significant renovations to an existing one) before having to face the community over a closure/amalgamation decision. When a closure depends on the board succeeding in getting funding for a new school, the existing school suffers.

Boards said virtually unanimously that trustees should not be required to attend public meetings. Actual practice appears to vary widely (possibly in line with how contentious the proposal is). They could be involved at the planning stage, however, as long as meetings were not public, as well as in the final decision.

It was noted that the PARG process can be very difficult for school staff to navigate, especially in small communities, because they may have children in the system or the school itself and may wish (or be expected) to advocate against the board's position. This can create conflicts, particularly around the sharing of board information. Conversely, staff often have on-the-ground knowledge in areas like parking and drop-off needs that would be useful to officials. It was suggested that bargaining agents could act as the conduit for staff concerns and information.

Are there other elements the ministry should consider?

There was some interest in a business case model for closures and a standard template to present school data to the public during a Pupil Accommodation Review. As well, a template for community partners to propose alternatives would help ensure they provided the right information and understood the parameters that boards use to assess proposals. It was suggested that in looking at a potential closure, boards should take into account future students coming from First Nation communities.

Some boards suggested the option of professional development for staff presenting proposals at community meetings, or the use of third-party facilitators. Some felt the ministry should provide the funding for this. There was also a question of what process, if any, should be used when a school self-closes (that is, has no students), and a suggestion that the ministry, not the board, should be responsible if an accommodation review is required.

Many felt that secondary students/student trustees provide a valuable perspective that is often more objective and they should definitely be engaged, although not necessarily as decision-makers. Examples were provided of students explaining to alumni and parents why a proposal would benefit the student body, especially from a programming perspective, and helping to create constructive dialogue.

There were concerns, however, about the risk of students being bullied or intimidated.

A student trustee suggested that boards should make more of an effort to educate students, even those in elementary school, about the issues and encourage them to express their views in surveys and other forums.

Board staff should meet with the school community council.

Do you have suggested improvements or comments on the elements being proposed?

- Change the model so that 70% positive support would allow a board to proceed, rather than focusing solely on negative feedback (although boards noted that those opposed will always be more vocal, more willing to send delegations, and so on.)
- Have community meetings earlier and provide more time for feedback
- Standard toolkits/templates would need flexibility for boards' differing situations

Boards and some others felt that requiring or allowing third-party validation of decisions would undermine the role of staff, although having this available on a voluntary basis might be good. They also wondered who would do the review and what qualifications would be needed. One board said that formal endorsement should take the form of the ministry's approval in principle of the relevant capital improvements.

One place where involvement of a third party other than the ministry might be acceptable was the long-term accommodation plan.

Community Planning and Partnerships Guidelines (CPPG)

Do you think the above measures to support improved coordination of community infrastructure planning will work to promote sustainable use of school space in communities? Are there other elements the ministry should consider? Do you have suggested improvements or comments on the elements being proposed?

The biggest concern is that organizations who may be interested in partnerships/ hubs opportunities do not have funding for operating costs. In many cases, boards said, groups continue to expect free space. Extending the discussion period does not address this.

Boards in the Toronto area reported that there is high demand for space in schools in specific locations (usually accessible by transit) that are newer, air-conditioned, accessible and have gyms/double gyms – and also fit the organization's budget.

In some cases, schools that organizations would like to be in do not have space available. It is also hard to find partners or potential buyers when the school property is not suitable in terms of size. One board has had successful partnership with local police, who run training workshops.

Boards in the Toronto area said they prefer to keep buildings in the public realm because they are very difficult to get back once sold to the private sector. Others felt that boards should not be able to keep schools that are not in use for full-time students, and that the ministry should have a say in boards' decisions to sell or keep their schools.

Indigenous participants expressed a need for more incentives to explore joint-use schools with provincially funded boards. Access to schools is critical, they said, for organizations like the native friendship centres. They noted that their more remote communities are often hard-hit by school closures because, for example, the school might have the only gym in a very large area. As well, their students might now face a much longer bus ride, and the First Nation is often required to cover the added transportation costs.

Indigenous participants felt that many school boards lacked the knowledge or relationships to engage effectively. Boards need to set up formal meetings with clear protocols as to what will be discussed to foster collaboration between all education stakeholders. The Indigenous lead should also be involved. They noted that two Indigenous groups – First Nations people living outside their traditional territory and Metis – are particularly at risk of being overlooked because they are less visible. Organizations like the friendship centres and Metis Nation of Ontario could help identify them, they said.

They also suggested meetings with Indigenous residents should not focus just on students and their parents, but should acknowledge the broader sense of community that is central to Indigenous life. As well, shared facilities should consider the need for dedicated spaces for sacred ceremonies, meetings with elders, on-the-land learning and other cultural uses.

While Francophone schools are the centres of their community, and thus natural candidates for acting as hubs, there were questions around boards being compensated for the added costs of this role. French-language participants also expressed concerns about assimilation if facilities are shared between Anglophone and francophone boards.

When making decisions about school infrastructure within communities, what measures could be helpful to fostering collaboration and cooperation between municipalities and school boards?

Boards commented fairly consistently on the difficulty of working with municipalities. Municipalities are felt to have a different agenda (one board reported the experience of the city buying a surplus school building and then selling it immediately to developers).

In areas of growth, there was considerable criticism that municipalities planned their communities badly in ways that increased school boards' costs and often threw up roadblocks when boards wanted to build schools; yet they expected to be able to influence boards' decisions about closures. Participants noted that because economic activity drives the viability of neighbourhoods and communities, there needed to be more (and better) ties to community partners, including municipalities.

Boards with schools in rural and remote communities felt the pressure from the municipality to keep a school open because of its role in the community, but the board's job is education, not community sustainability. There were also problems because small municipalities lacked the resources and funding to work effectively in partnership. There was a comment that different parts of government need to work together more effectively to achieve these outcomes.

Factors that would help foster collaboration:

- A toolkit for partnerships, including templates to help potential partners provide the right information
- Design of infrastructure (when building schools, for example, some boards have included community-use sections that are self-contained)
- Communication with the community
- Funding to cover the additional costs (such as wear and tear on property and equipment, longer opening hours, enhanced security) and to encourage principals to keep space available

To the final point, ensuring initial and ongoing costs for "community use of space" is covered was a major concern. Whether renovating or building new, planning needs to reflect that these are long-term investments that need ongoing renewal and there must be a long-term funding arrangement to align with them – something that few partners could commit to. (Conversely, Indigenous partners said they needed to be compensated for their capital investments in school facilities that later close.)

General comments about community hubs

- While principals are key in planning for community use, they are often not consulted.
- Working with a partner slows the process of putting a new school in place.
- The Province should co-ordinate funding from all relevant ministries, including Education, to deliver child and family support services in schools
- The ministry should create a new category for schools that are critical to the long-term viability of a community (for example, the only school in a large area); generally, rural and urban schools may require a different funding model.
- It appears that there are two conflicting policies for boards to sell properties and to arrange community hubs.
- There is no definition of community hubs. For example, is partnering with a developer or locating a movie theatre in a school facility considered a community hub?
- Better communication to public and stakeholders, especially municipalities, would be helpful.
- Currently, the public perception is that community hubs will save schools from closing and this is not always true.
- Listing vacancies and needs for space on the ministry website would be better than boards trying to coordinate this themselves.
- Cities consider school yards as city green space, but don't own the land.
 A city-board partnership would be ideal, but would require the city to pay the school board for maintenance.

Identifying Efficiencies and Reinvestments

In which areas is there potential to find new efficiencies and saving?

Various suggestions were made (not all participants would agree with all measures proposed):

- Sharing services for administrative functions such as payroll, recruitment, purchasing, finances, technology
- Making greater use of business intelligence tools to streamline/reduce reporting
- Formalizing arrangements whereby smaller boards can use the resources of nearby larger boards for specialized projects, like a capital expansion
- Streamlining the capital approvals process for boards

- Standardizing data collection and submission across school boards
- Managing attendance/absenteeism better
- Providing consistent, evidence-based guidance on protective personal equipment purchases
- Sharing of facilities by co-terminous boards (which one organization said should be required, not optional) and more effective use of facilities generally
- Bundling/streamlining EPOs or, at a minimum, coordinating across the ministry to develop consistent standards and processes, especially for reporting
- Making the ministry structure, which includes both central and regional offices, more efficient in general, and reducing the bureaucracy at the ministry and board level
- Creating a portal in EFIS providing a list of all EPOs, which agreements have been signed, a calendar of reporting and due dates, the kind of reporting required, and other relevant information
- Bundling funding for leads and letting boards decide which lead positions to fund
- Abolishing the Education Quality and Accountability Office
- Expanding the use of Grade 7-12 schools where appropriate
- Using videoconferencing instead of requiring staff to travel to ministry meetings and presentations
- Reducing enveloping (with the exception noted below)
- Focusing on average class sizes instead of class caps, which are more costly and complex
- Increasing class sizes
- Increasing the length of the school year
- Appointing school board members, as is done in the hospital sector, instead
 of having them elected
- Flowing municipal taxes directly to the ministry instead of through the board
- Making municipalities, not school boards, responsible for child care

It was noted in more than one session that current models do not provide incentives for boards to find savings, since the savings go back to the ministry. A specific example is transportation funding. Allowing boards to use savings from finding efficiencies in this and other areas could help fund much-needed classroom services for students.

Where might reinvestments be most effective in supporting ongoing efficiencies, or improving programs?

- Information technology, computers and broadband modernization, and related professional development for teachers
- Accessibility, particularly in light of discussion of an Education Accessibility Standard
- Special education, especially to address incidents of violence, and funding that reflects actual, not predicted, need
- Wrap-around supports for Indigenous students, with the involvement of Indigenous organizations and communities
- Innovative EPO pilot projects for Indigenous language/experiential learning
- Specialized math and science teachers for every grade
- Renewing and improving technical shops (such as science labs)
- Student and teacher mental health, developed in coordination with other ministries
- Limiting the size of Full-day Kindergarten classrooms to 20 students and improving staffing
- Expanding supports and services for injured workers returning to work
- Increasing administrative grants and enveloping them so they can't be used to cover other shortfalls
- Better covering the costs of having childcare in schools
- Supporting those who may struggle in the new de-streamed schools
- Implementing the new global competencies goal

General comments on grant structure

- Grants should recognize factors that lead to different costs across the province, similar to the way some allocations in LOG identify students at risk. For example, a cost-of-living index (or some other economic model) across the province would help ensure that salary benchmarks and capital funding reflect local conditions and changes over time.
- The ministry should create a miscellaneous grant for all the allocations that don't fit logically in other grants.
- Components of the Cost Adjustment and Teacher Qualifications and Experience Grant, which currently includes allocations for both teachers and non-teaching staff, should be moved to separate sections of the GSN to avoid confusion as to their intended use.

Additional comments

A few participants suggested that a full overhaul of funding arrangements, carried out by the third party, was needed. Another suggestion was that the ministry should link funding, as closely as possible, to teacher-directed initiatives that support teachers and students in the classroom.

Schools have changed significantly in the last 20 years, but the GSN has not, participants said, and as a result may no longer reflect the realities of the classroom. As well, the 2002 Rozanski Report on education recommended regular reviews of funding arrangements.

On a related point, several participants noted that both the GSN and capital benchmarks are out of date.

One organization noted that recent provincial education initiatives have the goal of "achieving excellence, ensuring equity, promoting well-being and enhancing public confidence," going on to suggest that to meet these goals, the government must follow through on its stated objective of focusing on accountability and transparency. Reporting requirements should not be scaled back, the group added.

Several participants pointed to new sick leave/absenteeism provisions as the root of the growing demand for and shortage of occasional teachers, educational assistants and other staff. It is also increasing costs. (Two suggestions for the short term were the creation of a regional supply teacher list shared by all local boards, not individual board lists; and a temporary lifting of a provision that limits retired teachers to 50 days of supply teaching before their pension benefits are reduced.)

Another source of demand is the growing number of professional development (PD) days. One participant suggested redesigning the school calendar so that, for example, the year could start in August and still accommodate needed PD days.

A concern raised in discussion of Indigenous education, but with broader implications, was older students who have left school and are now returning. Ministry funding under Student Success is not available because of their age. It was suggested that reaching out to these students could be part of a community hub, with recognition that Student Success funding should not have to be used in a conventional classroom. (On a related note, the ministry's definition of independent study works against helping students at risk, one board said; if it's defined as "modular learning," ministry won't fund it even if a student is working with a specific teacher.)

Indigenous participants repeated their interest in being briefed earlier in the process and/or at more frequent intervals, especially given the remoteness of their communities, the complexity of the issues, and the need to take ideas back

to communities for their input. First Nations representatives had many concerns about tuition agreements, including lack of clarity about the cost basis, differing costs from one board to another, and lack of accountability for how the tuition funds are spent.

Boards noted that they are feeling the impacts of rising utility costs and safe drinking water and other environmental issues, will feel the effects of the increased minimum wage in several operational areas, and need additional funding for education as cannabis is legalized.

Numerous issues around transportation were raised. A review of the funding model is currently under way, but several participants noted challenges that they felt needed to be addressed in the meantime:

- It's increasingly hard to find bus drivers, which will be exacerbated by a higher minimum wage. One suggestion was an annually increasing bonus for drivers who return to the job; another was ending the contracting out of transportation.
- One school board noted that changing service levels is challenging because of "incredible pushback from parents."
- Indigenous and other participants raised the need for more options and greater flexibility as a critical issue for students living in remote areas or far from their school, because of long commutes and rigid schedules that limit involvement in school-based cultural, social and/or sports activities outside the school day.

Another issue was deferred maintenance and a capital backlog totalling an estimated \$15.9 billion. This should be eliminated over four years, participants said, and annual funding for maintenance significantly increased to avoid a new backlog and allow better asset management planning. Both permanent schools and portables need a commonly understood and measurable standard of good repair that takes into account a wide range of concerns. One organization said that any school that is open should be fully funded, no matter how much of the school is used.

It was also noted that facility underfunding problems were compounded by the way that funding benchmarks were set in the GSN.

A longer planning window for capital was suggested, to support more effective investments by school boards. It was suggested that the Province require developers to pay education development charges and update the regulation around the collection and use of these charges, including making them available to fund new buildings and clear repair and maintenance backlogs.

There were many suggestions around special education. In addition to the need to increase funding generally, the following were raised as priorities:

- Addressing the increasing incidents of violence towards teachers and others, with impacts are both direct (injuries and/or difficulties working effectively while wearing protective gear) and indirect (mandatory leave for staff who must use force to protect another child)
- Funding special education transportation, which is often very expensive (student might need to be accompanied, vehicle might need shatter-proof glass, etc.)
- Providing more paid time for staff who come in contact with special education students who pose a risk of danger to be briefed and prepared before the start of the school year and to update safety plans and training in-year
- Increasing staffing in all schools with potentially violent students
- Making several changes in the Special Education Grant and requiring better reporting on how boards spend it
- Identifying students with special needs earlier, before Grade 1
- Modifying/designing schools to better protect staff and students
- Reviewing the impacts of changes to the funding model for the Differentiated Special Education Needs
- Where students with special needs are integrated into the classroom, providing provincial class size and composition guidelines
- Assessing whether separate classrooms for students with special needs, which some boards are providing, is an effective/equitable approach

Another concern was a current autism pilot. Although some viewed it as a good initiative, others were concerned about it leading to the use of contracted-out workers instead of school staff.

It was suggested that GSN funding should cover the costs of having a full-time public health nurse on site in every school. They would support general student well-being, as well as provide individual plans of care for students with daily medical needs, make schools safer for these students and ensure their needs are recognized in school board policies, connect students to community health care, and enhance access to programs and supports in rural and northern communities.

Participants from rural and remote areas, especially the north, were concerned that the ministry makes assumptions that do not reflect their "on the ground" experience, and the unique challenges of serving rural/remote Ontario get lost in the wider GSN discussion.

In a French-language session, participants wondered if the ministry could provide greater guidance and/or funding to encourage more French-language childcare spaces, since municipalities – which currently have a central role in childcare – do not see this as a priority.

It was also noted that French-language boards face very different cost structures, owing to their larger geographic areas and language needs. A need to identify French-language rights-holders more clearly was also identified.

Concerns were raised about the perceived inequity of paying elementary principals and vice-principals in the English-language system less than their secondary counterparts.

One organization suggested that full day kindergarten funding should be enveloped and funding of all students in the pupil foundation grant should be brought up to secondary levels. The same organization felt that more information should be provided on how funding for trustee associations is used.

As in previous engagements, several parties noted that maintaining four school systems creates inefficiencies.