



**SUBMISSION
TO THE
EDUCATION EQUALITY
TASK FORCE**

**Presented by
Ontario Public Supervisory Officials'
Association (OPSOA)**

OCTOBER 2002

ONTARIO PUBLIC SUPERVISORY OFFICIALS' ASSOCIATION (OPSOA)

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ONTARIO PUBLIC SUPERVISORY OFFICIALS' ASSOCIATION (OPSOA)
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Thank you for the opportunity to present to you today. Education Finance is a complex business and your task is a challenging one, but we are hopeful that the results of your efforts will be of substantial benefit to the students in Ontario's public education system.

Introduction

OPSOA is the Ontario Public Supervisory Officials' Association, the professional organization of supervisory officers, superintendents and directors of the 31 public district school boards of Ontario. Our members serve more than 2/3 of the students of this province.

We are very proud of our record of providing quality education for so many students over the years. But we have deep concerns about our ability to sustain that quality without considerable funding assistance.

In our role of implementing programs and managing school systems, we experience first hand the frustrations of students and parents caused by financial restrictions and cutbacks.

From the many presentations you have heard to date, undoubtedly, there are common themes emerging in key areas of school board operations.

This presentation speaks to those common themes, and emphasizes the urgency of making some very necessary adjustments to the funding of education.

1. Real Decreases in Expenditures Per Pupil

The funding model that existed prior to 1998 was no longer workable, the benchmarks were not sustained and the model was no longer equitable. We don't dispute that it was time for a change and we acknowledge the bold step the government took by putting a new funding model in place. However, if we take a closer look at the principles upon which the new model was based, in particular, the principle of equity, a very different story emerges.

We did an analysis of the net operating expenditures of the English-language school boards (attached as Appendix 1) over a ten-year period starting in 1992 through to 2002.

These figures were deflated using 1992 as the base year so that a real comparison of net per pupil expenditures could be made.

A very disturbing trend appears in these figures. Public school boards have experienced sizable decreases in per pupil expenditures, ranging from -3.1% to -20%, with most of the decrease occurring over the last five years.

In contrast, many of the English-language separate school boards have seen sizable increases in their per pupil revenues over the last five years ranging from 2% to 18%. While we don't dispute the need for this increased funding for these boards, what is evident in this analysis is that despite the government's claims of adding more money to the education pot since 1997, the gains for some boards have been at the expense of other students in the province.

The real decrease in purchasing power for a majority of boards has occurred at a time when these boards are faced with some of the greatest challenges such as implementing a new curriculum across all grades, dealing with massive staff turnover particularly in school administration, having to implement new health and safety requirements and address new legislative and regulatory changes.

2. Employee Compensation

Without a doubt, employee compensation, that is, salaries and benefits, has the biggest impact on school board budgets.

As you know, education is not a one-person show. A host of staffing resources is necessary in the delivery of high quality educational programs to students today. These include classroom teachers, educational assistants, principals, vice-principals, curriculum leaders, school-based support staff, caretakers and maintenance workers, health professionals as well as central administrators. The considerable cost of providing staff development must be factored into education funding.

Given the labour intensive nature of education, it is not surprising that employee compensation accounts for about 80% of total school board expenditures.

The benchmarks for employee compensation are grossly out of date. The salary benchmarks have been adjusted by 1.95% since 1997, compared to a growth in Ontario's CPI of 10.4%. The benchmarks for benefits are also out of date. The province needs to recognize that school boards have no control over statutory benefit increases, and have very little flexibility in finding cost savings in their employee benefit plans, which are very similar to the benefit plans received by other public sector employees.

These benchmarks need to be adjusted to reflect actual costs by region, and they need to be updated on an annual basis to be consistent with compensation adjustment being made in the broader public sector.

Two other issues of concern to many boards is the lack of funding for retirement gratuities and pay equity settlements. Pay equity legislation enables unions to challenge school boards if “circumstances change”. The cost of going through this process can be huge since many of these settlements are retroactive and deal with large groups of employees.

Retirement gratuities are historical and although many boards have negotiated the elimination of gratuities for new hires, the direct benefit of this action will not be realized for many years. Boards are left to fund gratuities for existing employees as they retire. In the past, retirement gratuities were funded through the salary cost savings realized from replacing experienced teachers with new hires. These salary savings are now going directly back to the province, yet boards have been left with the gratuity expense.

We believe that the province must fund these extraordinary expenditures experienced by some boards.

3. Special Education

You have heard about the difficulties boards are having with funding for special education. The concept of stable funding just doesn't work when student needs continue to grow and supports must be in place for these students.

The funding application process is administratively taxing, diverting a large portion of these limited resources to paperwork, while many students are not being adequately served. This is clearly not the intent and clearly cannot continue.

School boards are being challenged by parents and organized groups on student placement decisions that have added additional costs and diverted resources from students with special needs in classrooms.

We will leave you with a copy of our special education document (Appendix 2) that outlines a number of recommendations for you to consider. These recommendations speak to the need for a cost analysis on special education to be done and used as a basis for developing a new funding model for special education – a model that recognizes the supports needed by these students and funds the supports appropriately.

4. Facility Maintenance

The state of our school buildings should be of great concern to all of us. Funding intended for school maintenance is being used to address the unavoidable cost pressures in salaries and in program areas like special education. The deferral of regular maintenance has resulted in an increasing backlog of larger renovation and repair projects.

At this point, fixing the benchmarks in those other areas wouldn't address the facilities backlog problem. The backlog has grown too large. Ministry of Education staff estimate this cost to be about \$5.6B province-wide. Consideration should be given to funding this backlog in a manner similar to other large-scale building projects funded by the province.

Further, renewal dollars need to be sufficient to address the changing program needs in schools. For example, upgrading of science labs, construction of computer labs, upgrading of autoshops, food service rooms, construction shops, cosmetology rooms, etc.

As well, those working directly in education realize that schools have a function to serve the community beyond the daily delivery of curriculum lessons. In this modern world, we must recognize community use of schools.

5. Transportation

The current transportation funding formula is based on the 1997 transportation expenditure levels of boards and was intended to be a transitional model until a new basis of funding was established. The transitional model does not recognize the current costs of purchasing or operating transportation services in 2002.

Funding benchmarks for all transportation costs need to be developed by the Ministry in consultation with School Bus Operators and school boards and then funded accordingly. Transportation funding for other programs or student issues, such as handicap bussing, should be calculated based on actual costs on a board-by-board basis.

6. Structure of the Model

The current model attempted to focus revenues on students and as a result uses a per pupil approach to generate all grants. The difficulty with this premise is that not all school board expenditures are necessarily per pupil based. For example, the costs of major administrative computer systems such as financial systems, student information systems and human resources/payroll systems are not determined by student enrolment.

The actual expenditures of boards need to be analyzed and understood and the actual cost drivers need to be identified. Funding needs to be directly linked to the cost drivers so that boards have sufficient revenues to address their actual costs.

Conclusion

As I said at the beginning of my address to you today, we appreciate how difficult your challenge is. The task of revising an education funding formula that will work for all students in Ontario is a daunting one. We at OPSOA share your desire to improve the quality of education for students by provision of equitable funding. We hope that what we presented today is of assistance to you and we would like to offer you continued support in this process as public board Supervisory Officials in the province.

Our members wish to assist with the development of workable strategies. They are determined to provide the delivery of learning opportunities for students.

Real Net Operating Expenditures Per Pupil (Deflated using 1992 as base year)

APPENDIX 1

Board Name		District Number	1992	1997	2001/02	Rank in 1992	Rank in 1997	Rank in 2001-02	Real Change in Exp/Pupil '92 to '02	% Real Chg in Exp/Pupil '92 - '02	Real Change in Exp/Pupil '97 to '02	% Real Chg in Exp/Pupil '97 - '02
Toronto District School Board	1	Dsb12 tor	\$ 7,713	\$ 7,399	\$ 6,210	1	3	16	\$ (1,503)	-19.5%	\$ (1,189)	-16.1%
Peel District School Board	1	Dsb19 peel	\$ 6,223	\$ 5,950	\$ 5,180	3	22	58	\$ (1,043)	-16.8%	\$ (770)	-12.9%
Greater Essex County District School Board	1	Dsb09 gre	\$ 5,934	\$ 6,021	\$ 5,332	12	19	47	\$ (602)	-10.1%	\$ (689)	-11.4%
Ottawa-Carleton District School Board	1	Dsb25 ott	\$ 6,155	\$ 6,662	\$ 5,918	6	9	22	\$ (238)	-3.9%	\$ (744)	-11.2%
York Region District School Board	1	Dsb16 york	\$ 5,782	\$ 5,773	\$ 5,307	15	30	52	\$ (475)	-8.2%	\$ (466)	-8.1%
District School Board of Niagara	1	Dsb22 nia	\$ 5,596	\$ 5,717	\$ 5,340	19	33	46	\$ (256)	-4.6%	\$ (377)	-6.6%
Hamilton-Wentworth District School Board	1	Dsb21 ham	\$ 6,087	\$ 5,649	\$ 5,301	9	35	54	\$ (786)	-12.9%	\$ (348)	-6.2%
Halton District School Board	1	Dsb20 hal	\$ 5,895	\$ 5,619	\$ 5,312	13	37	50	\$ (583)	-9.9%	\$ (307)	-5.5%
Kawartha Pine Ridge District School Board	1	Dsb14 kaw	\$ 5,438	\$ 5,570	\$ 5,270	26	38	55	\$ (168)	-3.1%	\$ (300)	-5.4%
Upper Canada District School Board	1	Dsb26 upp	\$ 5,507	\$ 6,096	\$ 5,776	23	18	26	\$ 270	4.9%	\$ (320)	-5.2%
Thames Valley District School Board	1	Dsb11 tham	\$ 5,464	\$ 5,731	\$ 5,464	25	32	42	\$ 0	0.0%	\$ (267)	-4.7%
Near North District School Board	1	Dsb04 near	\$ 5,681	\$ 6,638	\$ 6,347	17	10	14	\$ 666	11.7%	\$ (291)	-4.4%
Lambton Kent District School Board	1	Dsb10 lam	\$ 5,191	\$ 5,760	\$ 5,509	39	31	38	\$ 319	6.1%	\$ (251)	-4.4%
Limestone District School Board	1	Dsb27 lim	\$ 5,704	\$ 6,146	\$ 5,910	16	16	23	\$ 205	3.6%	\$ (236)	-3.8%
Waterloo Region District School Board	1	Dsb24 wat	\$ 5,573	\$ 5,482	\$ 5,309	20	42	51	\$ (264)	-4.7%	\$ (173)	-3.1%
Hastings & Prince Edward District School Board	1	Dsb29 has	\$ 5,379	\$ 5,871	\$ 5,755	30	25	27	\$ 376	7.0%	\$ (116)	-2.0%
Trillium Lakelands District School Board	1	Dsb15 tril	\$ 5,660	\$ 5,917	\$ 5,824	18	24	25	\$ 164	2.9%	\$ (92)	-1.6%
Simcoe County District School Board	1	Dsb17 sim	\$ 5,534	\$ 5,312	\$ 5,231	22	49	56	\$ (304)	-5.5%	\$ (82)	-1.5%
Lakehead District School Board	1	Dsb06Alak	\$ 6,081	\$ 6,123	\$ 6,104	10	17	20	\$ 22	0.4%	\$ (20)	-0.3%
Grand Erie District School Board	1	Dsb23 gran	\$ 5,335	\$ 5,624	\$ 5,628	36	36	33	\$ 293	5.5%	\$ 4	0.1%
Durham District School Board	1	Dsb13 dur	\$ 5,474	\$ 5,286	\$ 5,303	24	50	53	\$ (171)	-3.1%	\$ 17	0.3%
Algoma District School Board	1	Dsb02 alg	\$ 6,024	\$ 6,967	\$ 7,035	11	6	7	\$ 1,011	16.8%	\$ 68	1.0%
Superior-Greenstone District School Board	1	Dsb06Bsup	\$ 6,639	\$ 8,112	\$ 8,208	2	1	2	\$ 1,569	23.6%	\$ 96	1.2%
Rainbow District School Board	1	Dsb03 rai	\$ 5,874	\$ 6,379	\$ 6,460	14	13	11	\$ 585	10.0%	\$ 81	1.3%
Upper Grand District School Board	1	Dsb18 upg	\$ 5,367	\$ 5,378	\$ 5,468	31	46	40	\$ 101	1.9%	\$ 90	1.7%
Avon Maitland District School Board	1	Dsb08 avon	\$ 4,964	\$ 5,541	\$ 5,664	46	39	32	\$ 700	14.1%	\$ 124	2.2%
Keewatin-Patricia District School Board	1	Dsb05Akee	\$ 6,096	\$ 6,981	\$ 7,150	8	5	6	\$ 1,054	17.3%	\$ 169	2.4%
District School Board Ontario North East	1	Dsb01 one	\$ 6,175	\$ 7,431	\$ 7,675	5	2	3	\$ 1,501	24.3%	\$ 244	3.3%
Bluewater District School Board	1	Dsb07 blu	\$ 5,351	\$ 5,428	\$ 5,616	33	44	34	\$ 265	5.0%	\$ 189	3.5%
Renfrew County District School Board	1	Dsb28 ren	\$ 5,244	\$ 5,358	\$ 5,698	38	48	30	\$ 454	8.7%	\$ 341	6.4%
Rainy River District School Board	1	Dsb05brair	\$ 6,176	\$ 6,914	\$ 7,410	4	7	4	\$ 1,234	20.0%	\$ 496	7.2%
Windsor-Essex Catholic District School Board	2	Dsb37 win	\$ 4,983	\$ 5,715	\$ 5,219	44	34	57	\$ 236	4.7%	\$ (495)	-8.7%
Huron-Superior Catholic District School Board	2	Dsb31 huro	\$ 5,437	\$ 6,553	\$ 6,299	27	11	15	\$ 863	15.9%	\$ (254)	-3.9%
Toronto Catholic District School Board	2	Dsb40 torc	\$ 5,544	\$ 5,941	\$ 5,730	21	23	28	\$ 185	3.3%	\$ (212)	-3.6%
Catholic District School Board of Eastern Ontario	2	Dsb52 eas	\$ 4,897	\$ 5,869	\$ 5,687	50	26	31	\$ 790	16.1%	\$ (181)	-3.1%
Ottawa-Carleton Catholic District School Board	2	Dsb53 ottc	\$ 5,342	\$ 5,981	\$ 5,852	34	21	24	\$ 510	9.5%	\$ (129)	-2.2%
Niagara Catholic District School Board	2	Dsb50 niac	\$ 5,033	\$ 5,416	\$ 5,357	43	45	44	\$ 325	6.5%	\$ (58)	-1.1%
Sudbury Catholic District School Board	2	Dsb32 sud	\$ 5,291	\$ 6,206	\$ 6,185	37	15	17	\$ 894	16.9%	\$ (21)	-0.3%
Halton Catholic District School Board	2	Dsb46 halc	\$ 4,592	\$ 5,006	\$ 4,997	55	59	60	\$ 405	8.8%	\$ (9)	-0.2%
Dufferin-Peel Catholic District School Board	2	Dsb43 dpe	\$ 4,891	\$ 5,141	\$ 5,146	51	56	59	\$ 255	5.2%	\$ 5	0.1%
Hamilton-Wentworth Catholic District School Board	2	Dsb47 hamc	\$ 5,339	\$ 5,480	\$ 5,503	35	43	39	\$ 164	3.1%	\$ 23	0.4%
London Catholic District School Board	2	Dsb38 lon	\$ 4,947	\$ 5,540	\$ 5,605	48	40	35	\$ 658	13.3%	\$ 65	1.2%
St Clair Catholic District School Board	2	Dsb39 clai	\$ 4,623	\$ 5,506	\$ 5,595	54	41	36	\$ 972	21.0%	\$ 89	1.6%
Thunder Bay Catholic District School Board	2	Dsb34Aithu	\$ 5,354	\$ 6,019	\$ 6,139	32	20	19	\$ 786	14.7%	\$ 120	2.0%
Simcoe Muskoka Catholic District School Board	2	Dsb44 smc	\$ 4,539	\$ 5,198	\$ 5,317	57	54	49	\$ 778	17.1%	\$ 120	2.3%
York Catholic District School Board	2	Dsb42 yor	\$ 5,184	\$ 5,198	\$ 5,325	40	53	48	\$ 141	2.7%	\$ 126	2.4%

Real Net Operating Expenditures Per Pupil (Deflated using 1992 as base year)

Board Name		District Number	1992	1997	2001/02	Rank in 1992	Rank in 1997	Rank in 2001-02	Real Change in Exp/Pupil '92 to '02	% Real Chg in Exp/Pupil '92 -'02	Real Change in Exp/Pupil '97 to '02	% Real Chg in Exp/Pupil '97 - '02
Waterloo Catholic District School Board	2	Dsb49 watc	\$ 4,973	\$ 5,195	\$ 5,402	45	55	43	\$ 429	8.6%	\$ 207	4.0%
Brant Haldimand Norfolk Catholic District School Board	2	Dsb51 bra	\$ 4,806	\$ 5,262	\$ 5,517	53	51	37	\$ 711	14.8%	\$ 255	4.9%
Algonquin & Lakeshore Catholic District School Board	2	Dsb55 algl	\$ 4,942	\$ 5,789	\$ 6,149	49	29	18	\$ 1,207	24.4%	\$ 360	6.2%
Northeastern Catholic District School Board	2	Dsb30Anor	\$ 5,384	\$ 6,866	\$ 7,334	28	8	5	\$ 1,950	36.2%	\$ 468	6.8%
Wellington Catholic District School Board	2	Dsb48 welc	\$ 5,087	\$ 5,115	\$ 5,466	42	57	41	\$ 378	7.4%	\$ 351	6.9%
Nipissing-Parry Sound Catholic District School Board	2	Dsb30Bnip	\$ 5,150	\$ 6,461	\$ 6,918	41	12	9	\$ 1,768	34.3%	\$ 457	7.1%
Renfrew County Catholic District School Board	2	Dsb54 renc	\$ 4,964	\$ 5,854	\$ 6,395	47	27	12	\$ 1,431	28.8%	\$ 541	9.2%
Durham Catholic District School Board	2	Dsb45 durc	\$ 4,581	\$ 4,867	\$ 5,356	56	60	45	\$ 775	16.9%	\$ 488	10.0%
Kenora Catholic District School Board	2	Dsb33Bken	\$ 5,379	\$ 6,271	\$ 6,927	29	14	8	\$ 1,548	28.8%	\$ 656	10.5%
Peterborough Victoria Northumberland and Clarington	2	Dsb41 pvnc	\$ 4,455	\$ 5,090	\$ 5,716	59	58	29	\$ 1,261	28.3%	\$ 626	12.3%
Huron-Perth Catholic District School Board	2	Dsb36 hur	\$ 4,292	\$ 5,219	\$ 5,973	60	52	21	\$ 1,681	39.2%	\$ 754	14.4%
Northwest Catholic District School Board	2	Dsb33Anor	\$ 4,853	\$ 5,849	\$ 6,816	52	28	10	\$ 1,963	40.4%	\$ 967	16.5%
Superior North Catholic District School Board	2	Dsb34Bsup	\$ 6,125	\$ 7,358	\$ 8,630	7	4	1	\$ 2,505	40.9%	\$ 1,273	17.3%
Bruce-Grey Catholic District School Board	2	Dsb35 bru	\$ 4,506	\$ 5,376	\$ 6,350	58	47	13	\$ 1,844	40.9%	\$ 974	18.1%
* Consumer Price Index			100	107.6	116.4							

Source:

1987 - Survey of School Board 1987 Financial Statements & Comparative Per Pupil Costs by Expenditure Function

1992 - School Board Statistics - 1992 Financial Statements

1997 & 2001/02 - 2002/03 Budget Projections

Consumer Price Index - StatsCan CPI Historical Summary 1992 = 100

**OPSOA SUBMISSION TO THE
EDUCATION EQUALITY TASK FORCE
WITH PARTICULAR REFERENCE TO
SPECIAL EDUCATION FUNDING**

*Submitted by: Ian Adamson, Superintendent of Special Education Program Services,
Peel District School Board*

*Brenda Kearney, Superintendent of Special Education, Halton District
School Board*

JULY 2002

A. CONTEXT

Dr. Mordechai Rozanski, Head of the Education Equality Task Force stated that recommendations will be made "to improve fairness, certainty and stability for our schools and our students."

In fulfilling its mandate the Task Force will include a review of the following:

1. The effectiveness of the model for distributing funding between different types of boards, for example, between urban and rural boards; small and large boards;
2. The structure of the cost benchmarks in the student-focused funding formula;
3. The degree for local expenditure flexibility school boards should have;
4. Approaches to addressing school renewal;
5. Whether the current approach to funding special education is the most responsive way to meet students' needs;
6. The approach to funding student transportation, including ways to maximize joint bussing between school boards that serve the same communities.

B. PREAMBLE

While this report focuses on the special education aspect of student focussed funding, comments are also made on other areas, for example school renewal and transportation, to the extent that they are impacted by special education.

This report is the result of discussion at a Special Education Forum sponsored by the Ontario Public Supervisory Officials' Association (OPSOA) on July 5th, 2002 which was attended by Special Education and Business supervisory officers representing seventeen (17) Public District School Boards from across the Province.

Halton	Toronto
Peel	York Region
Near North	Trillium Lakelands
Avon Maitland	Kawartha Pine Ridge
Thames Valley	Bluewater
Limestone	Renfrew
North East	Durham
Lakehead	Simcoe
Upper Canada	

OPSOA and its members have heard Minister Witmer's commitment in her June 14, 2002 statement "to listen to our education partners" and we make a similar commitment to participate in ongoing consultation and to provide input.

We recognize and support the need for accountability in a publicly funded education system and remain willing to work co-operatively and collaboratively towards realistic solutions. It is critical that the stated commitment of the Minister to consult and listen becomes reality.

C. THE ISSUES

The issues and recommendations discussed at the forum are loosely organized in five (5) areas as follows:

1. Integrated Services
2. ISA 2 & 3 Grants and Process
3. Finance and Transportation
4. Facilities and Accessibility
5. Program Delivery

Each section will outline the issues and concerns related to the general category and will be followed by recommendations for action.

1. Integrated Services

Issues:

- Currently, there is a 71 million dollar cap on programs presently being funded by the Ministry. That cap is arbitrary and is not student based.
- No new programs have been funded for the year 2002 - 2003.
- In the past, new funding has been as a result of the closure of existing programs brought about through monitoring processes.
- The Ministry of Education has made it clear that funding is a partnership process with other ministries and that education has always carried more than their share of the dollars.
- Strict Discipline student programs are receiving more dollars than preventative programs currently funded under Section 19 agreements.

- Ministry funding decisions are made at times which conflict with Board staffing timelines and collective agreement parameters.
- Transportation costs are not recoverable by Boards.
- Grants are not provided for computer technology, textbook, and staff professional development such as that required for the new curriculum.
- Group homes and specialized foster homes are licensed through government agencies and established by private operators with no regard for the provision of appropriate educational services to meet student needs.

Recommendations:

1. That the Government establish a committee of school board representatives and all ministries related to the services provided by Section 19 Programs with the purpose of confirming the identified issues and developing solutions. Stakeholder ministries include Education, Health, Community and Social Services and Correctional Services.
2. That a review be undertaken of Integrated Services and Program & Policy Memorandum 81 in order to clarify which Ministry is responsible for what service and to establish clear processes and structures for ongoing financial support for programs to support students with special needs.

2. ISA 2 & 3 Grants and Process

Comment:

- OPSOA acknowledges the collaborative approach undertaken by the Finance Branch of the Ministry of Education by the establishment of the ISA Working Group under the leadership of Peter Gooch. Furthermore OPSOA recognizes the benefits of having established a database related to students with high needs and its variability among boards. Accountability for the allocation of incremental expenditure is also recognized as a critical issue.

Issues:

- The current ISA file review process is a huge burden to school boards and has been well documented. The Ministry vision for the future is as yet unknown.
- The ISA process is stated to separate the individual student file which generates grant, from the provision of service to that student by school boards. The process, however, raises the expectation of level of service by parents and school personnel. In some boards this is being approached as a Human Rights issue.

- The criteria for qualification as an ISA 2 or ISA 3 claim include the provision of staff resources. Many boards do not have the funds to provide staff resources although the student meets all other qualifying criteria. These "Catch 22" students are not being provided with appropriate services.
- Special Incidence Portion (SIP) costs exceed grant provision.
- Many boards have exceeded their 'proxy' ISA grant during the 2002 ISA process and have demonstrated needs based on the Ministry's own criteria. No additional ISA funding has been received by school boards.

Recommendations:

1. That an ISA 2/3 grant process be developed which is based on a 3 year review cycle with annual grants based on enrolment and the established incidence rates.
2. That the ISA 2/3 grant take into account issues related to both declining and rapid growth enrolments.
3. That an additional Cycle 5 be added to the current ISA review process to include "Catch 22" files.
4. That the Ministry immediately provide additional grants to those boards that have exceeded their proxy.
5. That the file review process for grant generation be separated from the program delivery structure.
6. That the Ministry appropriately fund the administrative staff costs of whatever grant generation mechanism is implemented.
7. That the Ministry establish a workable process for portability based on a provincial student identification number.
8. That ISA 2/3 grant amount be increased and adjusted annually to reflect real costs of supporting student needs.

3. Finance & Transportation

Issues:

- Special education revenue for **all** exceptionalities has not kept pace with costs over time and does not match current expenditures. Furthermore, current expenditures do not meet student support needs. Services to students have therefore declined.

- Overall declining enrolment has a significant impact on SEPPA dollars while enrolment of special education students does not decline at the same rate, and in some cases is increasing. There are higher proportions of students with high needs, e.g. autism, in the younger age cohorts.
- Grant levels do not allow for competitive salary levels for professional support staff leading to significant shortages or complete absence of staff. This situation is particularly acute in rural and remote areas.
- The lack of program standards prevents consistent definitions of levels of service and the ability to assign related costs and expenditures.
- The incremental cost of special education transportation is not recognized in the transportation grant and leads to a reduced level of special education services to some students.

Recommendations:

1. That the Ministry release Special Education program and service standards for consultation and input from school boards regarding their financial viability **prior** to implementation.
2. That benchmark costs related to program and service standards for all exceptionalities be established and include both fixed and variable costs. Costs should be indexed to inflation.
3. That a review be undertaken of the Special Incidence Portion (SIP) funding mechanism and level to reflect actual cost and to reduce administrative process.
4. That the transportation grant be updated to reflect the enrolment of special needs students requiring specialized transportation services, including travel assistants.
5. That Boards have flexibility to allocate funds according to local priorities and needs.

4. Facilities and Accessibility

- The Ontarians with Disabilities Act and the Ontario Human Rights Code have established the right of all students to equal access to programs. Parental expectations are guided and supported by such legislation.
- Many schools were built at a time which predates contemporary views of accessibility and are prohibitively expensive or architecturally impossible to update. Elevators in particular are very expensive and can cost up to \$0.5M to retrofit.

- There is a lack of provincial standards for school accessibility and the "standards" are being set parent by parent, board by board. Equity is inconsistent.
- The location of special education programs is often driven by available space.
- Accessibility is not provided for within the facilities renewal grant.
- Accessibility challenges are particularly acute in smaller or rural boards where accessible transportation is also an issue.
- Students with special needs, including behaviour, require purpose-built accommodation.

Recommendations:

1. That the Ministry establish a standard and identify accessibility needs as part of the facilities conditions report/assessment.
2. That the Ministry develop a financial plan to implement the accessibility standards - including ongoing capital and renewal funding to maintain the standard.
3. That the Ministry include provision of adequate funding for handicap accessible transportation including home/school, school/school, and excursion transportation in its review of the transportation funding model.
4. That the Ministry provide adequate funding to enable the provision of specialized program accommodation.

5. Program Delivery

Issues:

- Program delivery models and levels of program support vary considerably from board to board leading to program inequity for students.
- IPRC decisions are subject to appeal and this process is prescribed by Ministry legislation and policy and is limited to designation of exceptionality and program placement. Most appeals, with Ministry support, fall outside the legislation and relate to program support (standards).
- Special education staff provides highly specialized support which requires ongoing training and professional development.

Recommendations :

1. That the Ministry abolish the Special Education Appeal Board process and implement a mandatory mediation mechanism.
2. That the Ministry provide a statement of expectations for boards and parents requiring collaboration and cooperation with the mediation process.
3. That the Ministry include in any legislative change a pre-tribunal discovery process prior to granting permission for the Special Education Tribunal.
4. That the Ministry annually reimburse boards for litigation expenses where appeals are supported which fall outside legislated boundaries.
5. That the Ministry, in collaboration with school boards, establish viable program standards as a basis for special education program delivery models.
6. That all new initiatives requiring staff development and training should be supported by specified special education funding and that ongoing support dollars be provided.