



**ONTARIO PUBLIC  
SCHOOL BOARDS'  
ASSOCIATION**

**Leading Education's Advocates**

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February 27, 2018

To: Peter Tabuns, MPP (Toronto—Danforth), Chair of the Standing Committee of Social Policy  
Jocelyn McCauley, Clerk of the Standing Committee of Social Policy

Re: Bill 193 Rowan's Law (Concussion Safety), 2018

Please find attached a submission regarding Bill 193 Rowan's Law (Concussion Safety), 2018 that was previously shared with the Ministry of Education in a response to the recent posting on the Ontario's Regulatory Registry.

It should be noted that the Ontario Public School Boards' Association (OPSBA) has been following the concussion dialogue for many years, beginning in 2012 with the introduction of concussion legislation that instead eventually led to the 2014 release of PPM 158 – School Board Policies on Concussions. OPSBA did provide feedback to the drafting of the PPM, which led to many discussions among our senior staff and member boards about our role in the education of brain injuries and concussions. We have held professional development sessions on this topic and many boards have hosted their own conferences. PPM 158, which required boards to have policies, allowed us all to continue the work of raising awareness about concussion prevention, identification and management and outline expectations for school boards.

We want to stress our concern that our students need to be able to not only return to play, but return to learn. An overarching comment expressed by trustees is that all teachers, coaches, administrators and other staff need to be provided with regular training and that this must be fully supported by annual government funding. Thank you for your consideration of these comments.

Sincerely,

Laurie French  
President  
Ontario Public School Boards' Association

The Ontario Public School Boards' Association (OPSBA) represents public district school boards and public school authorities across Ontario. Together our members serve the educational needs of almost 70% of Ontario's elementary and secondary students. The Association advocates on behalf of the best interests and needs of the public school system in Ontario. OPSBA believes that the role of public education is to provide universally accessible education opportunities for all students regardless of their ethnic, racial or cultural backgrounds, social or economic status, individual exceptionality, or religious affiliation.

**OPSBA’s Comments regarding the proposed requirements of  
Bill 193 Rowan’s Law (Concussion Safety), 2017**

<b>Bill Requirements</b>	<b>OPSBA Initial Comments and Questions</b>
<p>An annual review of concussion awareness resources by athletes, parents/guardians of athletes under 18 years of age, coaches, and any other positions, such as officials, as prescribed by regulation</p>	<ul style="list-style-type: none"> <li>• Who would conduct this review at a school board or school level?</li> <li>• Would this person have medical training?</li> <li>• Would this require PD time (and release time)?</li> <li>• Could this include a confidential form/waiver that is signed by everyone and kept on file?</li> <li>• We need to partner with external community-based athletic associations, referees and officials to ensure we are all on the same page.</li> <li>• Some concern that this review just adds another layer of complexity on top of an already pressing agenda.</li> </ul>
<p>Establish a removal-from-sport protocol for athletes suspected of having sustained a concussion</p>	<ul style="list-style-type: none"> <li>• A consistent template for all stakeholders would be helpful.</li> <li>• Need to ensure that this is not only for the Physical Education teachers to monitor (some students get concussions from non-sport activities. All staff need to be aware).</li> <li>• Whose responsibility is it to initiate the removal from sport protocol – is it the Doctor, the School Principal, the Coach, the Parents/Guardian, the athlete?</li> <li>• What happens if concussion is undiagnosed? (Parents don’t know how to diagnose or don’t take child to doctor. What happens if student/parent does not tell school about diagnosis?)</li> <li>• How are school coaches informed if the protocol is initiated by community coaches?</li> <li>• There is also the question of students who participate in multiple sports outside of school. They could be concussed after participating in one of them and then that information may not always readily flow back to the school. We need to ensure good flow and communication and deal with issues of confidentiality and privacy. The onus is on the student and parent, but also on professionals outside of school boards.</li> </ul>
<p>Establish a return-to-sport protocol for athletes who have sustained a concussion or who are suspected of having sustained a concussion</p>	<ul style="list-style-type: none"> <li>• A consistent template for all stakeholders would be helpful.</li> <li>• What happens if a student continues to attend school, go to gym class, and play on a sports team? Who makes the final decision?</li> <li>• Should the parent/guardian have to sign off on their child’s participation?</li> <li>• Should students require a doctor’s note to return to school once officially diagnosed with a concussion?</li> </ul>

<p>Establish a concussion code of conduct</p>	<p>Code of Conduct refers to acceptable and respectful behaviours.</p> <ul style="list-style-type: none"> <li>• What does this mean exactly?</li> <li>• Who would create this?</li> <li>• Who will be included in the code of conduct?</li> <li>• Does OFSAA have a role in developing this code of conduct?</li> <li>• We should ask for a template for concussion codes of conduct.</li> <li>• How do we ensure inter-board sports are governed by the same protocols?</li> <li>• What do we do when someone doesn't follow the protocol? A code of conduct is asking for consistency in how everyone adheres to the protocol.</li> </ul>
<p>Proclaim a Rowan's Law Day, to be held every year on the last Wednesday of September</p>	<ul style="list-style-type: none"> <li>• How would this be promoted? Would there be supports for boards?</li> <li>• Some concern that this could create an expectation for other health-related issues and lose its importance.</li> <li>• Instead, perhaps this information could be made part of the grade 9 Health and Physical Education curriculum?</li> </ul>
<p>Require the Minister of Tourism, Culture and Sport to prepare and publish reports on the progress made in implementing recommendations set out in the report of the Rowan's Law Advisory Committee</p>	<ul style="list-style-type: none"> <li>• Is this to be shared with the Ministry of Education and all stakeholders?</li> </ul>