



**ONTARIO PUBLIC  
SCHOOL BOARDS'  
ASSOCIATION**

**Leading Education's Advocates**

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**March 23, 2018**

To: The Honourable Indira Naidoo-Harris  
Minister of Education  
Minister Responsible for Early Years and Child Care

Re: Feedback on Draft Revisions to Pupil Accommodation Review Guideline (PARG) and Community Planning and Partnerships Guideline (CPPG)

The Ontario Public School Boards' Association (OPSBA) appreciates the opportunity to provide feedback to the Ministry of Education on its recent draft revised Pupil Accommodation Review Guideline (PARG) and its proposed path forward to potential enhancements to the Community Planning and Partnerships Guideline (CPPG) to support integrated local planning in the future.

Many of our member boards have been delicately balancing aging infrastructure, declining enrolment, and financial pressures while doing their best to deliver quality programming in their schools, causing particular challenges for some who had to suspend any planned reviews during the recent moratorium. Most boards have conducted pupil accommodation reviews using guidelines revised in 2015, and have had to make difficult decisions about long-term program and accommodation plans, including school consolidations and closures.

OPSBA welcomes the Ministry's efforts to continue consulting with stakeholders on these latest revisions to the PARG. We also support the Ministry's commitment to update the CPPG to further encourage joint responsibility for integrated community planning by working with the Ministries of Infrastructure and Municipal Affairs to develop a voluntary pilot program involving municipalities, school boards, and other stakeholders who wish to enhance their collective capacity for integrated local planning.

Our Association used this latest consultation opportunity to survey its members for their feedback on the key draft revisions to the PARG. Overall, there was general support of the revisions; however, members indicated concern or wanted clarification on some of the proposed changes.

**Requiring Three Accommodation Options in the Initial Staff Report**

One of the ministry's proposed revisions is to require school boards to offer at least three accommodation options in their Initial Staff Report:

1. Recommended option
2. An alternative option

### 3. Status quo option

The options would have to address the potential impacts on student programming, student well-being, school board resources and the local community. In addition, a standardized Initial Staff Report template would be developed by the Ministry to ensure consistency.

OPSBA agrees that providing additional accommodation options and more information, in terms of the variety of impacts, would improve school board accountability and transparency to the community. However, we do have concerns regarding the additional human resources and research needs that will be required to obtain this additional information.

*“In some of our boards, it is not feasible to have three options. The load on a small board is untenable to produce this level of reporting.”*

*Superior Greenstone DSB*

As well, a few of our member boards pointed out that in some cases, there may not be an ‘alternative’ accommodation option to consider during a review and that further clarification on how an alternative option would be defined was necessary.

*“It would be helpful if the Ministry developed criteria around this circumstance (alternative option) and defined it within the template.”*

*Avon Maitland DSB*

In terms of the creation of a standardized Initial Staff Report template, OPSBA supports this proposal. The template would ensure consistency for school boards. Some boards suggested the template should be non-prescriptive and flexible to reflect the variety of long-term accommodation issues school boards encounter. OPSBA recommends that school boards be consulted in the development of this and any other templates related to the pupil accommodation review process.

#### **Economic Impact Assessments**

The proposal requiring an economic impact assessment to be undertaken if at least one school that is eligible to receive support from the Rural and Northern Education Fund (RNEF) is included in an accommodation review elicited many comments from our members.

Trustees indicated that clarity was needed on the key parameters the assessments would address such as impact on local businesses, family commutes and housing starts, etc., particularly considering the large numbers of schools on the published RNEF list, many of which are in areas of declining enrollment that would require this extra body of work. OPSBA strongly supports the ministry’s commitment to consult with school boards and municipalities on the development of the parameters, and an economic assessment template. However, there remain some fundamental questions about this proposal:

- How far in advance would the economic impact assessment forecast? Three to five years? Five to seven years? How long of a forecast would be deemed necessary to provide a truly comprehensive understanding of the full impact of a school closure/consolidation to a local economy over a period of time?
- Would long-term planning of local municipalities and local businesses be taken into consideration for the assessment?

- How long would an assessment take to develop and how might that impact a school board's ability to complete a pupil accommodation review within a single school year, particularly if more than one option involves an RNEF school or if a new option involving an RNEF school is introduced later in the accommodation review process?
- What responsibility would boards have for addressing the results of an economic impact assessment?
- Will the ministry fully fund the third party vendor economic assessments? Will there be criteria used to determine if an assessment will be fully funded?
- Will this component of the review be considered as part of any appeal made by a community?

OPSBA also has concerns about how much weight a board would be expected to place on the result of an economic impact assessment when measured against other critical factors such as program viability, aging infrastructure and declining enrolment in making a final decision about a school closure/consolidation. OPSBA recommends that if third party vendor economic assessments are required that these costs must be completely funded by the Ministry.

*"Gaging community or economic impact is a significant challenge and would require expertise that is not available at school boards. If economic impact becomes a requirement, it needs to have an easily accessible data source and an easily conducted analysis."*

*Toronto DSB*

A school board's ultimate mandate and priority is to support and foster student achievement and well-being through the provision of a high-quality education and we suggest that more consultation is necessary on this proposed change to the PARG.

*"We must never forget that we are not economic developers. We are charged with providing the best education possible. The impact on a community cannot take precedence over the impact on education."*

*Kawartha Pine Ridge DSB*

### **Public Meetings**

In our 2014 submission on the revised PARG, OPSBA voiced a desire for changes to timelines and supported the amendments at that time that would allow the process to be completed in five months, rather than seven. It was our position that two well-publicized and communicated meetings would be sufficient and this has been supported by our members who felt that the current accommodation review timelines and number of meetings were sufficient.

Some members have questioned the proposal to require a minimum of three public meetings in the standard process. This would extend the timeline to complete what is already an emotional process, which can hamper constructive dialogue with stakeholders.

*"Public meetings rarely result in concrete suggestions... the new time guidelines won't make the process more palatable to those whose schools close in the end. They will always want more time."*

*Kawartha Pine Ridge DSB*

Trustees also suggested that boards should have more latitude in selecting from a variety of potential consultation methods, beyond public meetings, that best suit the local community and that would result in meaningful and collaborative engagement while supporting good local decision-making and efforts to

build trust with stakeholders. Examples of alternative consultation methods could include open houses, online or workshops.

*“Why not define ‘consultation’ within the context of the accommodation review more broadly? This would allow boards to differentiate between methods that might serve the community well and support sustainable decision-making.”*

*Halton DSB*

OPSBA reiterates its previous position from 2014 that a minimum of two public meetings are sufficient for the standard process. OPSBA also believes that strong consideration should be given to the overall length of time it would take to complete an accommodation review process if there are additional meetings in either the standard or modified process, as well as the necessary staff time required to facilitate them. Extending the review process may make it more difficult to complete a review within a single school year which would leave potentially impacted school communities in a state of limbo in terms of enrolment and staffing.

*“Concern that the length of time needed to undertake will be impossible to complete within a year with staffing complete. Timelines need to include possible added meeting(s) as place holders from the outset. Is there meaningful information for a third meeting?”*

*Ottawa-Carleton DSB*

### **Secondary Student Voice**

OPSBA has a long standing relationship with our partner student trustee association, the Ontario Student Trustees' Association- l'Association des élèves conseillers et conseillères de l'Ontario (OSTA-AECO) and we support including the informed student voice in any consultation.

Many of our member boards already engage both elementary and secondary students during the transition phase of an accommodation review process to ensure their voices are included, not to mention Student Trustee participation in the Board decision-making phase of a PAR.

We support the Ministry's proposal to include a summary of secondary school student feedback in the Final Staff Report when a secondary school is involved in an accommodation review. This would include the voices of high school students earlier in the process.

We also acknowledge the Ministry's recognition that school boards will know best how to engage secondary students to gather and incorporate their valuable and meaningful feedback in the pupil accommodation review process.

### **Community Partnership Engagement Template**

OPSBA welcomes the development of any standardized templates that would help community partners engage school boards on potential partnership opportunities, such as proposed alternatives to school closures or proposals for community use of schools where cost recovery outcomes are considered and clearly defined.

We once again recommend that school boards be consulted on the development of any templates that would be used to enhance the accommodation review process and that would encourage ongoing, two-way consultation and responsibility with community partners, including municipalities.

### **Updating the CPPG to Better Support Local Integrated Planning**

We share the Ministry's commitment to support better integrated community planning by updating the CPPG to help foster a collaborative environment that encourages joint responsibility among municipalities, school boards and other community partners in local integrated planning.

School boards and municipalities should be better enabled and encouraged to work together successfully, both in and out of the PAR process. OPSBA supports the Ministry's plan to develop a new voluntary pilot program, to be launched in spring 2018, that will provide flexible support to municipalities, school boards and other relevant local partners who want to meaningfully contribute to integrated local planning, in the hopes that best practices and lessons learned will inform future policy and supports for community planning. With an imminent spring launch, more information for school boards that wish to participate in the pilot program is needed.

Building a strong foundation for sustainable, long-term community planning must include ongoing, multi-way communication among school boards, municipalities (staff and elected officials) and other relevant local community partners.

It cannot be understated that this foundation should be grounded in mutually respectful and reciprocal relationships that recognize and acknowledge not only the roles of municipalities in community building, but also the equally important role of trustees and school boards to that planning process, the autonomy of school boards and especially their core mandate, which is to provide a high-quality education to all students.

Municipal planning can often have a tremendous impact/effect on schools. It would be helpful if the same level of mandated engagement to inform and collaborate with municipalities outlined for school boards in the PARG and CPPG were mirrored in a similar document for municipalities from the Ministry of Municipal Affairs. This would provide clarity around the expectations on engagement for both school boards and municipalities and hopefully support more transparent, cooperative and mutually productive relationships within each of our respective areas of funding and responsibility.

OPSBA will continue its outreach to the Ministries of Infrastructure and Municipal Affairs and other related stakeholders to encourage increased partnerships and ongoing communications between school boards and municipalities.

*"We need to move forward on improving the relationship with our municipalities."*

*Renfrew County DSB*

As we mentioned in our [June 16, 2017 submission](#) to the Ministry's Rural and Remote Education Review and Discussion Paper, it would be helpful for the Province to provide clarification and direction on the advisory role and responsibilities of municipalities (staff and elected members) before, during and after a Pupil Accommodation Review process. Their roles should be clearly communicated through their Ministry and its stakeholder associations (Association of Municipalities of Ontario – AMO, Rural Ontario Municipal Association – ROMA). It should also be underscored for municipalities that school boards are the final decision-making body in a pupil accommodation review process. This should not be left open to interpretation by any stakeholder group.

With a provincial election looming and the ministry's intent to release the final revised PARG in spring 2018, it is our understanding that school boards will be expected to amend their existing PAR policies in time for implementation for the 2018-19 school year. Clarity is needed on the ministry's timeline for its consultation with school boards on the creation of a standardized, flexible Initial Staff Report template and economic impact assessment parameters and template which need to be conducted prior to finalizing the PARG to ensure our input is considered.

We thank you once again for this opportunity to provide feedback on the proposed PARG changes and we look forward to upcoming consultations to provide input into the development of the various templates proposed to support the revised PARG.

Sincerely,

A handwritten signature in black ink that reads "Laurie French". The signature is written in a cursive, flowing style.

Laurie French  
President

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 nearly 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.