

APPENDIX A

TDSB's 2022-23 Education Funding Guide Response to the Ministry

The Toronto District School Board (TDSB) is Canada's largest and most diverse school board, with approximately 233,000 students at 583 schools. We also serve more than 130,000 life-long learners in our Adult and Continuing Education programs.

As the largest and most diverse school board in the country, we have unique needs when it comes to what is required to best support our students and communities. Our students need safe and modern learning environments, appropriate special education supports, targeted supports for mental health and well-being, and access to reliable and up-to-date technology. As we continue to deal with the impacts of the COVID-19 pandemic, it is more critical than ever that school boards receive adequate financial support to help address the widening gaps in student achievement, and mental health and well-being needs resulting from the pandemic.

The TDSB's Response to the Education Funding Guide Questions

MENTAL HEALTH SUPPORTS

How are Ministry supports helping school boards meet the mental health needs of their students?

To support student mental health during the pandemic, the TDSB has hired additional Social Workers, Child and Youth Workers, and Child and Youth Counsellors using the COVID-19 Priorities and Partnerships funding. As we deal with the impact of the ongoing pandemic on student mental health, it is important that this funding continues next year so that these additional positions remain in place to support students.

In addition, staff have been able to use the culturally responsive daily well-being activities through School Mental Health Ontario (SMHO). These have been put into a daily, easy-to-use calendar for staff. Staff are in the process of expanding these resources for the full school year.

Staff have also developed Mental Health Tool Kits for students using the resources provided by SMHO, which have been very useful for in-person and virtual school students to support mental wellness. The culturally responsive resources from the Ministry have been helpful.

What can the Ministry of Education, other ministries, school boards and other partner agencies do to better support the mental health needs of students?

We believe that additional opportunities for collaboration and shared leadership between the Ministry, school boards and community partners would create a more streamlined process and improve support for students and families. The TDSB recommends having one central intake process for the referral of families. It would also be very helpful to provide families with connections to culturally responsive agencies and resources in a timely manner.

In addition, community case managers who can bridge with school boards and support

families in ongoing connections to community agencies, supports and culturally relevant resources would be beneficial.

Lastly, additional funding for support staff in schools is required to support learners now and into the future. These supports will be needed for several years after the pandemic, as students transition back to a normal school environment. The impact of the pandemic will be felt for a significant period of time and we need to be able to support our students. For example, at the TDSB, there are Social Workers who support 5-7 schools in some cases. Supporting such a large number of schools and students impacts staff's ability to meet the mental health needs of students.

REDUCING ADMINISTRATIVE BURDEN AND RED TAPE

What initiatives could support the reduction of red tape and administrative burden for the education sector?

The reporting requirements between the Education Financial Information System (EFIS) and other ad hoc reporting throughout the year should be streamlined, condensed and simplified. The Ministry may also consider aligning ad hoc Priorities and Partnerships Funding (PPF) reporting deadlines to the Board's Ministry financial reporting timeframes to streamline the financial reporting involved

The functionality and capability of the Transfer Payment Ontario Online Platform should be enhanced to allow for notifications, workflow management and delegation. For example, for the Multi-Project Transfer Payment Agreements (TPA), the ability to assign or tag program owners to review and acknowledge TPA prior to final sign off by the Director of Education would improve efficiencies.

For TPA funding announced after the first quarter of the school year, sufficient time should be provided to allow for the use of the funds or flexibility to defer revenue. It has been a challenge to achieve full funding utilization, especially when the funding is used to hire additional staffing, as recruitment efforts and finding the right talent can take time.

There are also significant non-financial reporting requirements for certain PPFs, such as Human Rights and Equity Advisor, Autism Spectrum Disorders, Focus on Youth, Graduation Coach program for Black students, and French as a Second Language. The Ministry should consider reducing the reporting requirements for these PPFs by, for example, requesting only one consolidated year-end report instead of multiple reports with different timelines.

The Ministry's pandemic funding has also resulted in additional reporting requirements and increased workload for staff. For example, staff are required to provide information on the use of funds, quantity and type of purchases (e.g. HEPA) and staff information on very short notice. Extending timelines and reducing requests would reduce the administrative burden.

Are there areas of overlap or duplication within the GSN (e.g., funding or reporting)? If so, what are they?

As described above, reporting for certain Ministry funding sources should be streamlined,

condensed or simplified. In terms of funding within the GSN, the TDSB does not experience any overlap or duplication.

LEARNING OPPORTUNITIES GRANT

Given that the 2021 census is nearing completion, what is the best way to integrate updated census information into the GSN?

The allocations should be based on the most recently available census data, as opposed to the 2006 Census, to better reflect the actual demographics of communities and the needs of current students. The redistribution of funds among school boards resulting from using more recent census data should be phased in over two years to allow time to make the necessary adjustments to contracts or expand services based on the changes in funding levels.

The Learning Opportunities Grant (LOG) should use the most current census information to inform distribution. The information from 2006 is 15 years old which, given the purpose of the LOG, is significantly out-of-date.

Should the Demographic Component of the LOG be focused on a specific outcome(s)? If so, what are they?

No, the LOG should not be focused on specific outcomes unless these outcomes are opportunities to learn. For example, the expansion of specialist programs in regions of the city that have lower socio-economic status populations or families.

The LOG uses student performance indicators as a means to fund programs, like Student Success and the Literacy and Numeracy Secretariat. However, the original intention of the LOG was to support learning opportunities. This is a critical potential funding source for the TDSB. There are areas that the LOG could support as we work on notions of optional attendance, alternative programs in elementary, French Immersion, and Gifted programs that all disproportionately benefit higher socio-economic status populations in the TDSB. As such, the LOG should not be attached to performance indicators. Instead, the LOG should be attached to learning opportunity indicators, like breadth of learning opportunities within regions of the TDSB that have lower socio-economic status or serve marginalized populations of students.

If the Ministry puts further restrictions on the LOG allocation it will impact the ability of school boards to develop local programs to support the needs in their community.

URBAN AND PRIORITY HIGH SCHOOLS

Should the school board list be updated to respond to changing demographics and growth within school boards? If so, what factors should be considered in updating the school board list?

Yes, the school board list should be updated to respond to the changing demographic and growth within school boards. Currently, the Ministry is using Learning Opportunity Index (LOI) data to allocate funding. However, while the LOI numbers for schools have

changed, allocations have remained the same. Presently, we have schools with low LOI scores with no funding, while other schools considerably higher on the LOI, receive a large portion of the funding.

How can the Ministry ensure that the funding allocation is spent on supports for the most academically challenged at-risk students?

The Ministry should review the data that they have collected on an interim basis (every three years) to see if the same schools require the financial support to reach in-risk students. This review would allow for internal restructuring and changes to occur without school boards having to propose funding changes. With the system in place now, proposed funding changes from outside of the Ministry can take months or years to be put in place.

NEW TEACHER INDUCTION PROGRAM

Given that there is no fixed benchmark for the NTIP, are school boards facing challenges due to funding varying every year with the fluctuation in the number of teachers?

Yes, from a budgeting and hiring perspective, there are challenges without a fixed benchmark. We ask that the Ministry consider changing the \$50,000 amount per school board to a proportion of a board's NTIP benchmark teacher funding amount (e.g. at 10% of the NTIP teacher amount). That would allow for a large board such as the TDSB to fund a central position to coordinate NTIP support.

What would be the benefits and/or challenges to having a fixed benchmark?

There are benefits from a budgeting perspective, as the funding allows for a permanent central position to coordinate NTIP support. A fixed benchmark would also assist with planning and staffing projections.

OTHER PRIORITY AREAS

In addition to answering the Ministry's questions above, we would also like to further highlight the following priority areas for the TDSB:

1. Mental Health and Special Education Support
2. Student Re-engagement
3. Technology and Cyber Security
4. Pandemic and Other Funding Supports
5. Lifting the Moratorium on School Closures
6. Education Development Charges
7. Expanding the uses of Proceeds of Disposition (POD)
8. Capital Funding and Approval Timelines

1. Mental Health and Special Education Support

Student mental health and well-being is an important part of student success and a priority at the TDSB. This year, as we continue to re-engage and integrate students who

have been impacted by the pandemic, prioritizing mental health and well-being has been more essential than ever. We have been focused on the intentional placement of Professional Support Staff in school communities, assessing needs throughout the school year for mental health and wellness supports, and collaborating with school communities to strengthen school engagement.

In addition, the TDSB has consistently spent more than the government funding provided for Special Education. In 2020-21, the TDSB spent \$34.1M more on Special Education than the funding provided by the Province. This is lower than prior years, where we were underfunded by \$47.4M in 2019-20 and \$47.8M in 2018-19. Additionally, the number of students requiring Special Education support increases each year, putting even more financial pressure on school boards.

To ensure that all TDSB students receive the support they need, we urge that the Ministry modify the Special Education funding model while providing the appropriate enhancements to meet the financial needs of school boards and the educational needs of the students of Ontario. This is becoming even more essential as the demand for Special Education continues to grow.

The 2021-22 COVID-19 mental health and Special Education supports have allowed the TDSB to make these key investments; however, it is important that this funding is extended to next year as the pandemic continues to impact our students.

2. Student Re-engagement

Since the initial COVID-19 school closure in March 2020, students have experienced multiple transitions to online learning. Concerns have been raised regarding the long-term impact of the pandemic on student learning, as well as the impact on student mental health and well-being.

While these closures have impacted all students and families, we know that the experience has varied greatly from student to student, depending on individual and family circumstances. In particular, there is evidence that the students impacted in the most significant ways are those from lower socio-economic households. Additionally, the degree to which COVID-19 has impacted Indigenous, Black, racialized and 2SLGBTQI+ students is of critical concern to the TDSB.

Throughout the 2021-22 school year, the TDSB has been implementing the COVID-19 Pandemic Recovery Plan, a three phase plan to identify which groups have been most impacted, where interventions will be put in place, and initial outcomes that result from these interventions. To fully support this plan, however, additional funding is required to ensure schools have the necessary resources for the re-engagement of students, with a focus on Indigenous, Black, racialized and 2SLGBTQI+ students.

3. Technology and Cyber Security

In September 2021, the TDSB launched the 1:1 Student Device Program for students in Grades 5 and 9. The program offers students a district-owned and managed Chromebook for educational use. This device is assigned directly to the student and will stay with them over a four-year period, 24/7. Students are able to take them home each night, on

weekends and over holidays, and are required to bring them to school each day to support their in-class learning. This board-wide initiative supports learning through technology, digital citizenship and our commitment to equity of access to technology. To support this program and 21st century learning, ongoing investments in IT hardware devices and digital resources are required.

In addition, it is important that investments into cyber security protection are also made in conjunction with this increase in student technology. Recent audit findings from the Office of the Auditor General of Ontario have highlighted the need for school boards to improve their cybersecurity and privacy measures. With the rapid increase in the use of technology and online tools due to the COVID-19 pandemic, additional resources are required to promote cyber resilience, so that students and educators can operate in a safe digital learning environment. A robust Broadband and Cyber Protection Program will also help mitigate against risk of loss resulting from cyber threats and incidents.

4. Pandemic and Other Funding Supports

As school boards adapt to the evolving pandemic situation, it is important that they are provided advanced notice of any funding changes for the following school year. This allows time for planning and determining strategic direction. An earlier funding announcement will also allow the program model for the upcoming school year to be communicated earlier in the process. This is especially important given the challenges associated with offering remote learning options for students.

The federal government's restrictions on international travel in response to the COVID-19 pandemic have resulted in a significant reduction in levels of immigration to Canada. This year, the TDSB experienced lower student enrolment, especially in terms of newcomer and Visa students, as a result of this decrease in immigration and restrictions on international travel. The Ministry funding for newcomers received this year allowed the TDSB to continue offering the necessary English as a Second Language (ESL) support for students this year, despite this decline in enrolment. This funding must continue into next year so the TDSB can maintain service levels for our newcomer students.

Despite the overall decline in newcomer students this year, the TDSB did welcome a number of Afghan students as part of the federal government's program to resettle refugees from Afghanistan in Canada. To ensure smooth transitioning to schools and to guide staff in creating conditions that support student success and well-being, the Board's Equity team and Human Right Office ran professional learning sessions earlier this school year. The TDSB also held orientation sessions for the families in partnership with external agencies, including settlement workers and community workers. In addition, the TDSB added ESL teachers, regular classroom teachers, designated early childhood educators and lunchroom supervisors to support these students. Resources were also provided in the areas of translation services and professional support services.

Lastly, as detailed in the sections above, pandemic funding to support key areas, such as mental health, student re-engagement, technology and ESL must continue into next year as the pandemic, and its impact on student learning and well-being, continues. In addition, the TDSB requests flexibility in the use of pandemic funding as the needs of our students continue to evolve.

5. Lifting the Moratorium on School Closures

Since 2017, there has been a moratorium on school closures imposed by the Ministry of Education. The TDSB requests that the school closure moratorium be lifted so that boards can review schools with low student enrolment. The lifting of the moratorium would also help facilitate long-term planning and prudent utilization of resources. In addition, the TDSB recommends revisions to the Pupil Accommodation Review Guidelines (PARG). The recommended revisions include providing the opportunity for student voice and input when a school closure is considered, and standardized tools for assessing information received during a Pupil Accommodation Review (PAR) process.

6. Education Development Charges

In Ontario, school boards, with the exception of the TDSB, are eligible for Education Development Charges (EDCs). The TDSB does not qualify because it has excess capacity when assessed on a district-wide basis, regardless of the significant capacity pressures and challenges faced in many neighborhood schools.

EDCs are a critical funding tool that would help the TDSB meet growth-related infrastructure needs. While there are pockets of space within our system, many of our schools are over capacity as a result of significant residential intensification in certain areas.

Lack of sufficient space in local schools in some areas of Toronto has forced the TDSB to adopt different accommodation strategies for managing enrolment growth, including redirecting students from new residential developments to other TDSB schools (located outside of the catchment area), using portables and changing program and school boundaries.

7. Expanding the Uses of Proceeds of Disposition

The TDSB requests that the Ministry allow school boards to use Proceeds of Disposition (POD) to support the modernization and redevelopment of schools. In Toronto, there are opportunities to work with the City and other public sector organizations and developers to create new schools funded by POD. In addition, the TDSB also requests that the Ministry allow the use of POD to support the administrative, furniture and fixture costs associated with new school developments.

8. Capital Funding and Approval Timelines

As you know, costs associated with construction in an urban environment are significantly higher than other areas of the province. The current provincial benchmark funding does not cover the actual costs of building additions or developing new buildings in the city of Toronto. In addition, the multiple approvals needed from the province to complete a construction project add additional time and costs, delaying our ability to accommodate students.