



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

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Mr. Grant Osborn, Director  
Capital Policy and Programs Branch  
Ministry of Education

Via Email: [Grant.Osborn@ontario.ca](mailto:Grant.Osborn@ontario.ca)

Dear Mr. Osborn,

The Ontario Federation of Agriculture (OFA) wishes to submit our views to the Ministry of Education's "Pupil Accommodation Review Guideline (PARG) Consultations". Schools are an integral part of the social and economic fabric of rural communities. In order to keep farm families on the farm and maintain their substantial contributions to the economy, farmers require access to a variety of high quality, affordable services and infrastructure which support their operations and families. This includes schools.

OFA is Canada's largest voluntary farm organization representing more than 37,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system, driving the Ontario economy. Ontario's agriculture sector is a major economic engine, providing jobs in both rural and urban communities. Ontario farms offer stability to our rural communities and represent an integral part of our social fabric by providing a healthy, safe food supply and contributing to environmental sustainability through the protection of soil, water and air resources.

I need to first express our displeasure and disappointment with the consultation process used for the proposed changes to the Pupil Accommodation Review Guidelines (PARG). These proposed changes have not been broadly disseminated. The consultation is not posted on the Ministry of Education website, and the opportunities for input into these proposed changes to a very important process have not been made openly available to those that will be impacted by the decisions. This is completely contrary to the 2014 Mandate Letter for the Minister of Education that states:

*We will place emphasis on partnerships with businesses, communities and people to help foster continued economic growth and make a positive impact on the lives of every Ontarian. This collaborative approach will shape all the work we do. It will ensure we engage people on the issues that matter the most to them, and that we implement meaningful solutions to our shared challenges.*

OFA also has serious concerns with the content of the proposed changes to the Pupil Accommodation Review Guidelines. Of utmost concern is the proposed elimination of the consideration of the school's contribution to the community and to the local economy. This is particularly concerning in rural areas and smaller municipalities that often rely on the rural schools for many functions beyond just a school. While larger municipalities have separate community centres and function spaces, this is often not the case for many smaller communities. If this proposed approach is adopted, it will significantly disadvantage residents in rural and smaller municipalities. The OFA requests that the following considerations remain an integral part of the Pupil Accommodation Review Guideline:

**Value to the Community**

- facility for community use;
- program offerings at the school that serve both students and community members (e.g., adult ESL);
- school grounds as green space and/or available for recreational use;
- school as a partner in other government initiatives in the community;
- value of the school if it is the only school within the community.

**Value to the Local Economy**

- school as a local employer;
- availability of cooperative education;
- availability of training opportunities or partnerships with business;
- attracts or retains families in the community;
- value of the school if it is the only school within the community.

In the “consultation” slide deck, it is fairly clear that due to the Ministry of Education’s “fiscal context” the Ministry’s intention is to change the guidelines to enable more schools to be closed. While the Ministry of Education and local school boards may appear to save money by closing a school, the costs due to the loss of connection to the community will be significant not only to rural residents but also to society. School fundraising and parent volunteering will suffer if the connection to the community is lost, not to mention the potential impact on the education of our children. It is OFA’s position that school closures need to be considered in a broad context, giving due consideration to the potential impact on the students, as well as on the entire community.

Local businesses also suffer from having students removed from the community. The students will not be in the community to spend their money, nor will they be available for after-school employment, because of the long commute.

The Premier has indicated that the Province of Ontario will focus on:

*Growing the economy and helping to create good jobs are fundamental to building more opportunity and security, now and in the future. That critical priority is supported by strategic investments in the talent and skills of our people, from childhood to retirement. It is supported through the building of modern infrastructure, transit and a seamless transportation network. It is supported by a dynamic business climate that thrives on innovation, creativity and partnerships to foster greater prosperity. And it is reflected across all of our government, in every area, and will extensively inform our programs and policies.*

As mentioned, schools are an integral part of the social and economic fabric of rural communities. In order to keep farm families on the farm and maintain their substantial contributions to the economy, farmers require access to a variety of high quality services and infrastructure, which support their operations and families. This includes schools.

Ensuring appropriate services and infrastructure are available to rural and small communities is necessary for attracting new business and therefore to achieving the provincial goal of growing our economy. If the impact of a school closure on a community is removed from consideration in the PARG process, how will we account for the potential impact to our economy? How does limiting the opportunities for public engagement in the PARG process allow decision makers to be fully informed of these potential impacts and therefore the impact of the decision they are to make?

We also point out the importance of “Value to the Student” considerations, especially the “Proximity of the school to students/length of bus ride”. How long a student spends on a bus to a different school will directly impact student achievement. Long commutes could have negative implications on the students’ health, academic performance, and overall development. The student may be too tired to concentrate on his or her lessons because of having to catch the bus so early. Long bus rides may also impact other very important aspects of our children’s development that are outside of student achievement. Some students will be required to quit after-school teams and activities because of the long commute. This may impact that students’ ability to access scholarships or affect their ability to afford continuing education into College or University.

OFA has been calling for cost-sharing between ministries to ensure that schools can be used more effectively through a shared service approach, since 2002. This approach could provide a means of keeping some of the necessary services and infrastructure in the communities. Current approaches to school funding do not have provisions accounting for these arrangements or for sharing costs.

We are pleased to see that Mandate Letter to the Ministry of Education calls for the development of a “Community Hubs Policy” suggesting exactly what OFA has been requesting for over a decade. However, the PARG proposal does not incorporate the important essence of the Community Hubs Policy. While the PARG consultation mentions that this policy will be developed, it fails to incorporate the spirit of this pending policy. It actually acts contrary to this approach.

The PARG consultation may also want to review the actual education funding formula to ascertain if there are efficiencies that may be found. Changes to the number of primary students permitted in a single classroom have led directly to under-utilized space in the school. Older schools were built with classrooms to accommodate 30 or more students. Now these classrooms are capped at 23 students. This impacts the students to space ratios within a school. It is another important example of how changing rules have impacted local schools.

OFA is opposed to a number of the proposed changes to the Pupil Accommodation Review Guidelines. It is necessary for both the Value to the Community and Value to the Local Economy to remain included within these reviews. This information is extremely valuable and needs to be considered in order to make informed decisions. Also, shortening the review process time, and decreasing the number of public meetings and ability for comment by the community is contrary to an open and transparent process.

The proposed changes indicate a lack of understanding of the realities faced by those living in small and rural municipalities. The consequences of these proposed changes will negatively impact these residents and students. The limited consultation on these proposed changes further exacerbate the concern that the ministry is taking a “one-size-fits-all” approach that excludes consideration for the realities of those living in small and rural municipalities. This speaks to a lack of equity in the treatment of this specific group of residents within the province.

I trust our opinions and recommendations will be given due consideration.

Sincerely,



Don McCabe  
President

cc: Hon. Kathleen Wynne, Premier  
Hon. Liz Sandals, Minister of Education  
Hon. Jeff Leal, Minister of Agriculture, Food and Rural Affairs