



Ontario Federation of Agriculture

Ontario AgriCentre

100 Stone Road West, Suite 206, Guelph, Ontario N1G 5L3
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December 6, 2017

Re: Revising the PARG and CPPG

Via: information.met@ontario.ca

To whom it may concern:

The Ontario Federation of Agriculture (OFA) welcomes the opportunity to once again provide our comments on the Pupil Accommodation Reviews. You will note that many of the issues being addressed in this consultation were highlighted by the OFA, specifically in the December, 2014 PARG consultations but also raised in our comments to the Ministry over the last 15 years. These previous submissions are attached and form part of this submission.

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 37,000 family farm businesses throughout Ontario. OFA addresses issues of interest to our farm family members including their deep concern with the accessibility of education across rural Ontario.

Discussion Question: Do you think the ministry's proposed revisions to the PARG will create a stronger, more collaborative process?

While the proposed changes provide a starting point for addressing the flawed process, there are still some elements that require elaboration, and some considerations that are still absent.

First and foremost, **an immediate moratorium on all school closures needs to occur, regardless of where it stands in the Pupil Accommodation Review (PAR) process.** The existing moratorium on beginning new reviews is insufficient. All completed PARs need to be discarded and go through the revised process, once it is available. Allowing decisions to stand based on a process that is known to be flawed and therefore subject to consultation and change is irresponsible and unscrupulous.

Statement from the Minister:

The Statement from the Minister identifies key components of the revised process. While it is stated that the Boards will work collaboratively to find solutions, collaboration with the Ministry of Education is missing. The Ministry can sometimes be an important player in this process. For example, one region came to an agreement amongst multiple boards, with the preferred option being the building of one large school, centrally located that would house both the Public and Catholic Boards. While this option had full support of both boards and the community, the Ministry was not willing to consider this as a solution. One critical factor in coming to this decision was that all the schools being considered in the process were old and in need of extensive upgrades. **The Ministry must be a willing participant in this process if a similar situation arises.**

Revising Pupil Accommodation Review Timeframes:

Ensuring adequate time to allow community members to understand and engage in the process is very important, and therefore the elimination of the minimum modified PAR timeframe, and extending the current minimum PAR timeframe beyond 5 months, are positive. **However, the PAR guidelines must also be clear that there are specific circumstances, beyond the example cited, that could necessitate an extended time frame.** There may be other, unforeseen circumstances that would make an extension of time frames reasonable.

Minimum requirements for the initial staff report:

Ensuring that “at least three accommodation options” are presented is a positive step, but does not go far enough. It will likely limit the presented options to close school “A”; close school “B”; or the status quo; when there may be other great options within a given community that are dismissed. **Therefore, there should also be a requirement to, at a minimum, list all the options considered and have a brief rationale as to why those options were dismissed.** Having only two options and a status quo does not provide the full confidence that all options are considered and that the best decision is made for ensuring the best education system for our children.

Information on how accommodation options will impact:

The Accommodation Options must ensure that appropriate measures and comparison are being made.

Student achievement and student well-being: The interests of the students must be considered before closing a school. **The impacts resulting from a significant distance and/or commute time to and from school must be contemplated.** If a student’s commute time is too long, the students' education could be negatively impacted. They may be too tired to learn to their full potential because of how early they must get up to catch the bus. It is probable that they will be unable to participate in extracurricular activities, such as sports and clubs, which can be so critical to their development. This lack of participation in extracurriculars can even negatively impact a students’ acceptance to university or college. These long distances may also prove prohibitive for parents to get involved with their children's education and schools.

Community and/or economic impact: This is an incorrect statement and **should be stated as “Community impact – social and economic”**. It is critical to understand both the social AND economic impacts of the accommodation options. **It is also essential that the correct social and economic metrics to be measured.** Economic impact goes well beyond the cost to the school board(s) and Ministry of Education. Examples of essential metrics to consider are outlined below.

As OFA has indicated many times, there are costs to a community for closing a school. Removing older students from rural areas for their education means that they are not in the communities to get part-time employment. Long commutes might prohibit them from being hired for after-school employment as they will be unable to get to work on time. Part-time employment can be a valuable aspect of a persons' development, and in eventually becoming a successful, productive contributor to society. It helps prepare them for their future. This includes employment on the family farm.

Removing students from the rural communities can also have a significant impact on the local economy as they are not around to spend their money at local restaurants and stores. Also, removing a school from a community can negatively influence their potential economic

development. The community will have difficulty attracting new residents without having a school for their children to attend.

There may also be additional social and financial impacts on the community resulting from a rural school closure. If a rural school closes, the facility that once served as a community centre, meeting hall and recreational club will no longer be available. Community residents may face additional taxes to build these facilities, resulting in a significant financial impact on the residents and to the community, as well as removing an important social space. This fact has been recognized by the government's Community Hubs initiatives, but now needs to be incorporated into the PAR process.

Developing ministry supports:

While it is useful to provide a template for community partners to use during these reviews, **flexibility must be provided whereby the use of such a template is not mandatory.** The process must allow relevant information to be brought forward by the community in a form that is comfortable to the presenter. Templates can be very useful in compiling information however they can also limit the ability to include important information or ideas that do not fit nicely within the template. Flexibility must be assured for the community participants in this process.

Other Items to be included:

There are other factors other than those within this consultation document, that directly impact the PAR. These factors must be considered as they are critical determinants within the review process.

Size of school boards: As a result of school board amalgamations, school boards are very large. This poses a problem in discussions surrounding school accommodation reviews. Growth could be occurring at one end of a school board resulting in a need for new schools to be built. At the opposite end of the board, the population may have remained stable, or even decreased, resulting in excess pupil spaces. Under the accommodation reviews, schools would have to close at one end of the school board, before money is granted for building the required schools in the area of growth. Because of amalgamation of the boards, there could be a two-hour or more travel time between the two areas within the same board. **Geographically large school boards must be divided into smaller areas for accommodation reviews.**

Education Funding Formula: Changes to the number of primary students permitted in a single classroom have led directly to underutilized space within schools. Older schools were built with classrooms intended to accommodate 30 or more students, but are now capped at 23 students. The change to number of students in the classroom is a positive decision for educational success of primary students. However, this skews the numbers to indicate greater underutilized spaces, thereby impacting which schools are named for accommodation review. **The Education Funding Formula needs to be reviewed to ensure that decisions made to benefit the education of our children are accounted for in other aspects of the education system.**

The Ministry's own "*Achieving Excellence: A Renewed Vision for Education in Ontario*" begins with the statement that "**Vibrant communities and a prosperous society are built on the foundation of a strong education system.**" Communities must have the appropriate infrastructure, which includes access to schools and high-quality education, to attract and keep residents that will contribute to a prosperous society. It is imperative that the correct decisions are made about our schools to ensure both the success of our students but also contribute to the prosperity of our society.

OFA appreciates the opportunity to present its perspective on revising the Pupil Accommodation Reviews. We look forward to seeing our recommendations incorporated into the next phase of this review – the draft of the revised pupil accommodation review guideline and community planning and partnerships guideline.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith Currie". The signature is fluid and cursive, with the first name "Keith" written in a larger, more prominent script than the last name "Currie".

Keith Currie
President

Attachments:

- December 16, 2014 Letter re: Pupil Accommodation Review Guidelines (PARG) Consultations.
- May 2003 Submission to the Rural Education Strategy Task Force

ATTACHMENT #1:



Ontario Federation of Agriculture

Ontario AgriCentre 100 Stone Road West, Suite 206,
Guelph, Ontario N1G 5L3 Tel: (519) 821-8883 • www.ofa.on.ca

December 16, 2014

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

original signed by

Don McCabe
President

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

ATTACHMENT #2:

Ontario Federation of Agriculture

**SUBMISSION TO THE RURAL
EDUCATION STRATEGY TASK
FORCE**

May 2003

ONTARIO FEDERATION OF AGRICULTURE'S SUBMISSION TO THE RURAL EDUCATION STRATEGY TASK FORCE

The Ontario Federation of Agriculture (OFA) is pleased to have this opportunity to provide recommendations to the Rural Education Strategy Task Force.

INTRODUCTION

The Ontario Federation of Agriculture (OFA) is the voice of Ontario farmers. Supported by over 44,000 farm families and 30 affiliated organizations, the OFA has a long history of representing farm family concerns to government and the general public, tracing its roots back to the Ontario Chambers of Agriculture established in the 1930s. Active at the local level through 49 county and regional federations the OFA is also a member of the Canadian Federation of Agriculture, the farmers' voice on national affairs.

Many of our members have expressed a great deal of concern over the potential loss of rural schools and the impact this may have on their communities. The OFA is committed to addressing issues regarding the economic and service infrastructure required for agricultural prosperity and rural well-being. Schools are one such service required for both.

If farming families are to remain viable and continue to contribute to the social and economic fabric of rural Ontario, they require access to a variety of affordable services and a well-maintained infrastructure. Because of the nature of the agricultural industry, farmers tend to be located in rural areas. Therefore the OFA is concerned with issues that arise specifically in rural areas regarding service provision to lower population densities.

KEY ISSUES

OFA would like to outline to the Rural Education Strategy Task Force the following key areas of concern:

1. Cost sharing and implications of rural school closure on students and the community;
2. Rural schools in non-rural school boards; and
3. Size of school boards for accommodation reviews.

Besides being a place of education, the rural school is often a meeting place for local service groups and clubs. According to the research of Dr. Al Lauzon and Ms. Daniel Leahy, smaller high schools result in greater levels of achievement and encourage greater participation rates. In short, rural schools can help keep youth active and interested in their communities. So that rural and remote schools continue to remain valuable fixtures in their communities, we ask that you consider our concerns and recommendations, a number of which were previously recognized in the final report of the Education Equality Task Force chaired by Dr. Mordechai Rozanski.

1. Cost sharing and implications of rural school closure on students and the community

OFA sees a **need for cost-sharing between ministries to ensure that schools, particularly those in danger of being closed, can be used more effectively through a shared service approach.** This could provide a means of keeping some of the necessary services and infrastructure in the communities. For example, inclusive child care programmes offering a spectrum of services to children and parents, including before and after-school programmes, make an appropriate fit with schools. Child care resource centres could be suitably located in rural schools, as could outreach services and other programmes directed at families and children. Rural schools could become the hubs for many programmes and services. **Costs could be shared between programmes and Ministries. However, current approaches to school funding do not have provisions for these arrangements, for sharing costs, or for removing this space from the capacity calculations. This needs to change.**

In addition, the impact of a school closure on students and the community in a rural area may be significantly more far-reaching than in an urban area. As aforementioned, schools often have many roles in rural communities. **The impact of closing a rural school on the students, their education, and on the community must be investigated before a decision can be made. These considerations must be acknowledged and addressed in the funding of our schools – especially in rural areas.**

The interests of the students must be considered before closing a school. **The amount of time students will be required to spend on buses to get to school must be evaluated.** If the bus ride is too long, the students' education could be negatively impacted. They may be too tired to learn to their full potential because of how early they must get up to catch the bus. It is probable that they will be unable to participate in extracurricular activities, such as sports, which can be so critical to their development. These long distances may also prove prohibitive for parents to get involved with their children's education and schools.

Removing older students from rural areas for their education means that they are not in the communities to get part-time employment. Long bus rides might prohibit them from being hired for after-school employment as they will be unable to get to work on time. Part-time employment can be a valuable aspect of a persons' development, and in eventually becoming a successful, productive contributor to society. It helps prepare them for their future. This includes employment on the family farm.

Removing students from the rural communities can also have a significant impact on the local economy as they are not around to spend their money at local restaurants and stores.

There may also be additional impacts on the community. If a rural school closes, the facility that once served as a community centre, meeting hall and recreational club will no longer be available. Community residents may face additional taxes to build these facilities, resulting in a significant financial impact on the residents and to the community.

2. Rural schools in non-rural school boards

It is OFA's understanding that the definition used to access the 'rural and remote grant' in the education funding formula uses a school board's distance away from five defined cities (Toronto, Ottawa, Hamilton, London or Windsor) as one of the criteria. Through recent amalgamations, school boards have become much larger and encompass greater diversity in the schools within the boards. Because of the increased size of school boards, it is likely that one area of the board will be adjacent to one of the five defined cities. As a result, school boards are now comprised of both rural and non-rural schools, but the boards are not considered to be rural or remote, at least in terms of accessing this grant. **The current definition of 'rural and remote' does not provide for rural schools that are located in larger, non-rural school boards.**

The needs of these rural schools are likely similar to those found within rural school boards. However, the rural schools in non-rural school boards do not have access to the support/resources that rural school boards have. **The OFA believes that the value of 'rural' schools in non-rural school boards must be recognized, and funding and policy support for these schools must be provided.** Perhaps schools could have a level of control over their budgets as a means of assisting in this issue.

3. Size of school boards for accommodation reviews

Criteria surrounding accommodation reviews need to change. As a result of school board amalgamations, school boards have become very large. This poses a problem in discussions surrounding school accommodation reviews. Growth could be occurring at one end of a school board resulting in a need for new schools to be built. At the opposite end of the board, the population may have remained stable, or even decreased, resulting in some excess pupil spaces. Under the accommodation reviews, schools would have to close at one end of the school board, before money is granted for building the required schools in the area of growth. Because of amalgamation of the boards, there could be a two-hour or more travel time between the two areas within the same board. Many in the community also sense a loss of local control due to the size of these boards. **As such, OFA recommends that these (geographically) large school boards be divided into smaller areas for accommodation reviews.**

SUMMARY OF RECOMMENDATIONS

- There is a need for cost-sharing between ministries to ensure that schools, particularly those in danger of being closed, can be used more effectively through a shared service approach. Costs could be shared between programmes and Ministries, such as day cares in schools. However, current approaches to school funding do not have provisions for these arrangements, for sharing costs, or for removing this space from the capacity calculations. This needs to change.
- The impact of closing a rural school on the students, their education, and on the community must be investigated before a decision can be made. These considerations must be acknowledged and addressed in the funding of our schools – especially in rural areas.

- The amount of time students will be required to spend on buses to get to school must be evaluated.
- The current definition of 'rural and remote' does not provide for rural schools that are located in larger, non-rural school boards. The OFA believes that the value of 'rural' schools in non-rural school boards must be recognized, and funding and policy support for these schools must be provided.
- OFA recommends that these (geographically) large school boards be divided into smaller areas for accommodation reviews.

CONCLUSION

OFA is confident that these recommendations will contribute to improved conditions for rural schools throughout the Province. If you require further clarification on any of these issues, please contact Scott Lynch, OFA Policy Researcher at scott.lynch@ofa.on.ca or by telephone at 416-485-3333.