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March 15, 2017

The Honourable Kathleen Wynne  
Premier of Ontario  
Legislative Building  
Queen's Park  
Toronto, Ontario M7A 1A

The Honourable Mitzie Hunter  
Minister of Education  
22nd Floor, Mowat Block  
900 Bay Street  
Toronto, Ontario M7A 1L2

Dear Premier Wynne and Minister Hunter:

On behalf of ROMA, I am writing to express concern with the growing number of school closures in rural areas across the province. As you know, this was a key issue raised at the ROMA conference, and many municipal governments have passed Council resolutions calling for a moratorium on rural school closures.

School closures in rural areas, particularly areas with only one remaining school, challenges the vitality of communities, often leading to families considering relocation, and eventual disinvestment in the area. There are also negative impacts on student wellbeing as they are often bused long distances away from their communities to the next nearest school. While we recognize that busing students to larger schools may offer them a broader range of courses, specialized facilities, and access to extracurricular activities, it also means these students lose the connection to their own communities, in the same way a senior would lose his or her sense of home by losing the ability to age in place. Larger schools often introduce additional challenges for students, including feeling overwhelmed, and connecting with community, other students and teachers. The policing community has also found that drug use challenges are more challenging to address in larger schools than they are in moderate and smaller sized schools.

A further concern is that the Province's plan to add 100,000 new childcare spaces in school facilities may be thwarted by school closures.

The increased frequency of school closures, and the fact that the value of a school to its local community has ceased to be a consideration in closure decisions, calls into question how

the future of rural communities is envisioned at the Province. In our view, the current process appears to support a process of urbanization. As schools are central to the vitality of small communities in Ontario, adjusting the closure review process to better support their continued operation would not only offer value to rural residents but also signal an interest in supporting the continued viability of rural Ontario.

Given this, ROMA is pleased to see that your government will be launching an engagement on new approaches to supporting education in rural and remote communities. Additionally, the Ministry of Education's new funding for planning for joint-use opportunities between school boards is also welcome. However, it is communities with only one remaining school which concern us most, and this new funding does not appear to respond to this challenge.

We also understand that the Ministries of Education and Infrastructure are exploring how developing community hubs could support rural schools. While we welcome innovative partnerships and community connections, we caution that the development of community hubs should not be seen as a panacea solution. In some cases, having community organizations or other entities share school resources may assist in allowing a school to remain open, but this presumes that these organizations have resources to contribute, which is not the case in many small towns.

ROMA believes that changes to the Pupil Accommodation Review Guidelines, funding allocation, and school board planning would help address the issue of rural school closures.

### **Pupil Accommodation Review Guidelines**

A number of the changes introduced through the Pupil Accommodation Review Guidelines review in 2015 led to concern among municipal governments. The most significant concern was that the decision to close schools no longer accounts for the value of the schools, the role that they play in a community's fabric, and how they strengthen communities.

Municipal governments also find that the process seems to create expectations about community involvement and consultation that it is often not able to fulfil. Additionally, the process lacks the flexibility to address board-wide issues, as Committees usually focus on specific schools or sets of schools, even though the space and enrolment issues may be board-wide. ROMA recommends the following 2015 changes be reconsidered and reversed:

- The Accommodation Review Committee's changed role from developing options and voting on recommendations to being a conduit for information sharing between the school board and school community. The Committee no longer votes on the recommendation, meaning decisions are based less on community input and more on the School Board.
- In the initial school board staff report to the Board of Trustees, the school profile no longer includes a school's value to the students, school board, community, and local economy, and instead, only includes school and school board data. This disadvantages small and rural schools, whose value cannot be as clearly expressed only through data.
- The Accommodation Review Committee composition now includes students and community representatives as optional rather than required, which reduces opportunity for community input.

- Previously, municipalities could be involved as Accommodation Review Committee members, and currently, school boards must invite municipal representatives to participate and provide technical support when developing the school profile. While the more specific involvement of the municipal government was supported, municipal governments should be mandated to be included in Committees.
- The whole process was shortened from seven to five months, and the number of required public meetings reduced from four to two. The process may be further shortened, the Accommodation Review Committee eliminated, and the number of public meetings reduced by implementing an expedited process.

### **School Funding Formula**

While funding streams such as the Declining Enrolment Grant and the Geographic Circumstances Grant assist schools in rural and northern areas which have lower populations, the majority of funding is per-pupil. As part of the changes introduced in 2015, a number of these supportive funding programs were reduced:

- The Declining Enrolment Grant funding was reduced,
- Base top-up funding for school operations for schools at 65% of capacity has been eliminated,
- The eligibility for a “supported” school is more restricted; and
- Rural schools are no longer eligible for funding top-up.

The 2008 Declining Enrolment Working Group, while established almost ten years ago, made recommendations regarding school closures, which continue to be relevant and should be considered. Regarding funding, the group recommended:

- The Declining Enrolment Grant should be adjusted and simplified so that more of the funding comes in the first two years, and should not be reduced.
- Funding for rural and remote schools, “supported” schools, and top-up funding should be streamlined and enhanced.

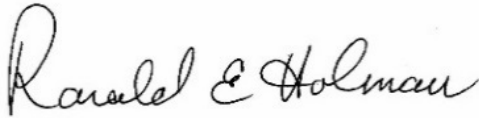
### **School Board Planning**

The Declining Enrolment Working Group also recommended that school boards conduct multi-year planning, and that all services and agencies funded by the Province should be required to consider using available school space before they build, purchase, or lease any other space. It recommended that boards building new schools should be required to look for community partners and other boards to engage in co-planning, co-financing and co-construction.

ROMA encourages you to consider these adopting these changes to ensure schools plan for long-term changes, that adequate funding exists to support schools which have great value to their communities but lower enrollment than in urban areas, and that the Pupil Accommodation Review Guidelines ensure a thorough review process involving adequate community input.

ROMA looks forward to working with you through your engagement on supporting rural and remote schools. We encourage you to engage us directly in your consultation, and to draw on ROMA's Rural Lens document to inform any potential changes. The viability of rural communities and a good education for our children and youth is an issue of particular interest rural Ontario municipalities, as it is to the Province of Ontario. I look forward to working together towards a positive outcome.

Yours sincerely,



Ron Holman  
ROMA Chair

cc: The Honourable Bill Mauro, Minister of Municipal Affairs  
The Honourable Bob Chiarelli, Minister of Infrastructure  
The Honourable Jeff Leal, Minister of Agriculture, Food and Rural Affairs