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**SUBMISSION
from
THE COMMUNITY SCHOOLS ALLIANCE
to the
CLASS SIZE CONSULTATION of MARCH, 2019**

The Community Schools Alliance appreciates this opportunity to submit its comments in response to the proposed changes listed in the Class Size Consultation Guide dated March, 2019.

We share and understand the fiscal challenges facing the Ontario government and recognize the need for a gradual reduction in the provincial deficit while maintaining financial support for services Ontarians deem to be essential.

We believe that in communities in Rural and Northern Ontario, schools are the hearts of those communities. They allow students to be educated in their home communities and provide a critical value to local economies.

Class Size

We are pleased that the Ministry of Education proposes no change to the limits on class size for the Primary Division (Kindergarten to Grade 3).

We have noted the minimal increase in the board-wide funded average class size in the Intermediate Division (Grades 4-8) from 23.84 to 24.5 and will monitor the effect of the increase as the new standard is phased in. We hope that the flexibility resulting from the use of a board-wide average instead of a hard cap will allow boards to implement the policy without adversely affecting small schools in Rural and Northern Ontario.

We do, however, have great concern with the proposal to increase the funded average class size in secondary schools from 22 to 28. We believe this represents a dire threat to the quality of education in secondary schools, particularly the smaller schools in Rural and Northern Ontario, and will lead to the closure of many of those schools unless a significant attempt at mitigation is undertaken.

As boards and schools prepare schedules and timetables for the proposed funded average, fewer classes will be scheduled in each school and fewer teachers assigned to it. With fewer teachers in a school, students will have a smaller range of courses available to them. Specifically, elective courses including those in the

trades, technology and the arts are likely to be reduced or eliminated. This is especially true in the smaller schools common to Rural and Northern Ontario.

In small secondary schools in Rural and Northern Ontario, it may be impossible to implement the increased class size average which will force administration to timetable for larger-than-average class sizes in larger schools in order to meet the board-wide average. To some extent, this is already happening in smaller schools but the situation will be exacerbated by the increased class size average. There will undoubtedly be pressure applied to boards to address the challenge by closing the smaller schools in Rural and Northern Ontario.

The Community Schools Alliance is pleased that the allocation for the Rural and Northern Education Fund will continue. This Fund, introduced in 2017-18 school year, has provided \$20 million annually to boards with schools that met the criteria specified by the Ministry. The Alliance welcomed the introduction of the RNEF which represented a recognition of the reality of the fiscal challenge of staffing smaller schools so common to Rural and Northern Ontario. It also represented a departure from the one-size-fits-all funding model previously used for years. We recommend that the RNEF be enhanced to be used by boards to mitigate the unintended negative consequences of the increase in the funded average class size in secondary schools described above.

The Rural/Northern Challenge

The challenge in meeting the increase in the funded average class size will vary inversely to the size of the secondary school. The larger the school, the easier it will be to comply with the average simply because of the greater number of classes and sections for each subject at each grade level.

Secondary schools in Rural and Northern Ontario are generally smaller and will often be limited to a single section for any given subject in each grade. Indeed, it is frequently necessary for a class to include students studying a subject at more than one grade level. Implementation of the funded average will exacerbate this situation and may diminish the motivation of students to remain in the school.

With the exception of the Rural and Northern Education Fund, the Ministry of Education continues to offer a one-size-fits-all funding formula to school boards. The formula offers little flexibility for school boards despite the discrepancy between large urban secondary schools and those in Rural and Northern Ontario in meeting the proposed increased class size average.

E-Learning

We acknowledge that e-learning classes provide a modernized learning experience for students and are aware that some students have already experienced virtual learning in some form in some secondary schools. We know that online learning has worked well for some students but are concerned that it may not work for all. We are also concerned that the phase-in of the proposed program is planned for 2020-21 but the province's plan to provide broadband to all boards, schools and

students will not be completed until 2021-22. For these reasons and because many answers to questions about the details of the delivery of the e-learning program have not yet been provided, the Community Schools Alliance is unable to endorse the proposal. We believe further consultation that includes a detailed description of the delivery of e-learning courses is required.

Recommendations

We recommend

1. That the implementation of the proposal to increase the funded average class size in secondary schools from 22 to 28 be deferred for at least one year pending the completion of a four-year impact assessment by each school board;
2. That the Rural and Northern Education Fund be enhanced to permit boards to offer staffing for an adequate range of courses and programs in schools in rural Ontario and the North;
3. That further consultation on the proposed delivery of e-learning courses be conducted following the release of a Ministry document that provides extensive details of the program; and
4. That a sliding scale of student to teacher ratios be developed for secondary schools that qualify for the Rural and Northern Education Fund and be implemented as part of a Rural Education Strategy.

Respectfully submitted,



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