



Community Schools Alliance

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The Community Schools Alliance welcomes this opportunity to comment on the draft revised Pupil Accommodation Review Guideline. We appreciate the extent of the consultation on the guideline which actually started with the 'engagement' announced in March, 2017, conducted in ten communities last May and continues with the period for feedback on the current draft.

We support the second paragraph of the preamble which reads in part "When a school board identifies a school that is projected to have long-term excess space, a school board would typically look at a number of options such as:

- moving attendance boundaries and programs to balance enrolment between over and underutilized schools;
- offering to lease underutilized space within a school to a coterminous school board;
- finding community partners who can pay the full cost of operating the underutilized space; and/or
- decommissioning or demolishing a section of the school that is not required for student use to reduce operating costs."

We recommend that the Initial Staff Report described in Section VI of the draft must include a description of the actions taken on all four options listed above including an analysis that identifies both positives and negatives.

In Memorandum 2018:B02 to Directors of Education and Secretary/Treasurers of School Authorities, a section titled Initial Staff Report states that boards will be required to use a ministry-approved template and also states that "impact on extracurriculars, student transportation and school climate surveys could be considered for inclusion".

We recommend that the template to be used to prepare the Initial Staff Report shall require that the impact on extracurriculars, student transportation and school climate surveys be included.

We believe that each municipal council within the attendance area of a school recommended for closure should have the opportunity to appoint a representative to the Accommodation Review Committee.

We recommend that the first sentence of the second paragraph in the segment of Section VII titled Membership be revised to read "Where

established by a school board's pupil accommodation review policy, representation from students and the broader community, including the municipal council(s) within the school's attendance area, shall be invited.

We applaud the requirement of a meeting with municipalities as described in Section IX but are concerned that the draft is silent on the timing of the meeting. We believe it must occur early in the review process.

We recommend that Section IX be amended to require that the meeting with municipalities be scheduled within 30 business days of the Board of Trustees' approval to undertake a pupil accommodation review, before the accommodation review committee is established and before the first public meeting.

We applaud the sentence in the Preamble that that reads "The Pupil Accommodation Review Guideline (the "Guideline") builds upon the CPPG by providing requirements for school boards to share information with and seek feedback from their local municipalities and other community partners related to any pupil accommodation reviews a school board initiates." The term "local municipality" to most people in two-tier municipalities means the lower tier municipality in a region or county. We are very concerned that Sections IX, XIII and XIV require that communications by school boards are with single and upper-tier municipalities only. One might assume that any communication from a school board to an upper-tier municipality would be forwarded by the latter to its lower-tier entities. While does often occur as one might expect, it should not be assumed it is always the case.

We recommend that the references to "single and upper-tier municipalities" in Sections IX, XIII and XIV be replaced by "municipalities" and that a definition of municipalities that includes single, upper-tier and lower-tier municipalities be added to Section XVII Definitions.

We believe that the proceedings of any meeting(s) with municipalities should be reported to the Board of Trustees before they make a final decision regarding a pupil accommodation review.

We recommend that the segment of Section XI titled Final Staff Report be amended to require that the segment includes a report that summarizes the proceedings of any meeting(s) with municipalities.

We are very concerned with the timeline for the first public meeting. We believe that 30 business days between the Board of Trustees' approval to conduct a pupil accommodation review and the first public meeting is not sufficient time to provide written notice to municipalities, establish an accommodation review committee and conduct an orientation session for the committee. We also feel, as indicated above, that the meeting with municipalities should occur before the first public meeting, **We recommend that Section XIII be amended to require that, beginning with the date of the Board of Trustees' approval to conduct a pupil accommodation review, there must be no fewer than 60 business days**

before the first public meeting is held.

We are pleased that the draft guideline requires that an economic impact assessment be completed and considered if a school proposed for closure is eligible to receive support from the Rural and Northern Education Fund (RNEF). We are also pleased that the Modified Pupil Accommodation Review may not be undertaken if one or more of the schools included in the review is RNEF-eligible. We regard these provisions as a departure from the one-size-fit-all approach of previous versions of the Pupil Accommodation Review Guideline and applaud them.

Yours truly,

A handwritten signature in black ink, appearing to read "Doug Reycraft". The signature is written in a cursive style with a large initial 'D' and 'R'.

Doug Reycraft
Chair, Community Schools Alliance