

# Response to OCSTA 2025-2026 Education Funding Feedback

The Ministry of Education (Ministry) issued the 2025-26 Education Funding Engagement Guide on October 4, 2024. In response, the Board of Trustees of the Dufferin-Peel Catholic District School Board (DPCDSB) provide the feedback in this report to the focus areas provided and some additional areas. It is important to the DPCDSB Board of Trustees to highlight the ongoing financial concerns associated with having an employer-funded Long-Term Disability (LTD) Plan and the impact to overall operations. DPCDSB has been working with the Ministry over four (4) years under a Financial Recovery Plan that requires assistance from the Ministry for a solution.

Catholic school trustees have a clearly defined role as stewards and guardians of Catholic education and they serve as system leaders of publicly funded education in their communities. When Catholic ratepayers direct their school support designation to the Catholic school system, they help ensure the health and vitality of Catholic education and the election of Catholic school trustees. The importance of Catholic school support designation should be shared broadly with all stakeholders. DPCDSB has an ongoing communication and public awareness campaign about the importance of school support designation, but would also encourage OCSTA to share this message.

The DPCDSB Board of Trustees provide the following input to the specific focus areas identified:

- 1. Core Education Funding Model Reform
- Provide feedback on the reform has it addressed the goals of simplification and strengthening accountability?

As the Core Education Funding model was only recently introduced in the Spring 2024 for the 2024-25 school year, it's difficult to provide feedback on whether the model has addressed the goals of simplification and strengthening accountability.

The model has re-organized the previous 18 grants into six funding pillars: a goal of the Ministry to make it easier to understand for stakeholders. However, for school board staff, the work to complete the Education Finance Information System (EFIS) package at each reporting cycle has not significantly changed.

 What opportunities or challenges are presenting as a result of limits on the funding that can be applied to student transportation and school facilities?

We foresee ongoing pressures on the school facilities line due to decreased enrolments and increasing costs of commodities and contracts, stringent health and safety regulations and aging facilities. Although the Board may be able to remain within the compliance targets, this is going to be an ongoing challenge until the moratorium on school closures is lifted or the funding model for school operating costs is changed. Since 2017, there has been a moratorium on school closures imposed by the Ministry. The DPCDSB requests that the school closure moratorium be lifted so that boards can review schools with low student enrolment. These schools face programming challenges that limit student pathways and extra-curricular choices. The lifting of the moratorium would also help facilitate efficiencies in operations, long-term planning and prudent utilization of resources.

 How can school board accountability be further enhanced, through the Core Ed Funding model or other mechanisms? School boards are responsible for the effective and efficient use of resources to achieve the priorities identified by the Ministry and the Board of Trustees. In order to execute these priorities, dedicated support staff and resources are needed. Examples include effective attendance management programs, supports to manage capital projects, renewal work and building operations and increased funding to invest in cybersecurity needs and student/staff access to technology.

• The 2024-25 Education Finance Information System (EFIS) Estimates reporting cycle suppressed Data forms B, C and D. Should the ministry re-introduce these forms in the future?

Data Form D was used to a limited extent, however, forms B and C do not add significant value to our analysis.

- 2. Special Education Funding
- How are school boards prioritizing ministry supports to meet the special education needs of their students? What other Core Ed funding are boards using to complement their Special Education Fund?

Due to overspend in the special education envelope, school boards are forced to utilize other funding areas, but underspending the revenue, in order to balance overall. This is not ideal. Sources available from the Learning Resources Funding (LRF) have to be used to supplement in efforts to meet the needs of all learners, including those with special education and well-being needs.

To meet the needs of students, DPCDSB is prioritizing staffing to ensure the safety and well-being of students and learning environments; resources to support students with complex behaviour profiles; use of evidence-informed learning resources to meet the needs of students with differing abilities; specialized equipment to mitigate barriers to learning for students and professional development to build capacity amongst teaching and support staff in the areas identified in the MYSP, including mental health and well-being.

 Is there a way to allocate the Special Education Fund (SEF) more effectively and/or efficiently, without creating the need for new provincial funding or increasing administrative burden?

The largest component of the SEF is based on the total enrolment of a school board and does not factor in the actual number of students that require special education programs and services. Incident rates at school boards vary based on many factors. There should be recognition for the ratio of students requiring special education services and resources compared to total enrolment.

The process required to apply for Special Incidence Portion (SIP) funding has resulted in barriers for schools to complete the applications, and results in the school board being underfunded. Simplifications are required.

There has been an increase in the number of students with complex needs that require multiple pieces of technology to support their access to curriculum. The base amount of SEA funding needs to address all needs of our students. For example; a vision claim requires multiple devices, such as cameras, iPad, laptop, and additional software; students with autism require special equipment to support daily programming.

Consideration for flexibility in spending short-term summer funding over a longer period of time (such as June to December) to allow school boards to see projects come to fruition and support student needs more sustainably. There are many barriers to securing staff for summer-only funding, particularly with respect to Student Mental Health Support.

 How can the Ministry further support school boards in the accurate reporting of students with special education needs and associated expenditures to ensure consistency among school boards?

It is recognized that there is disparity in addressing the needs of students in mainstream classes versus those in fully self-contained classes or partially integrated. One-to-one (1:1) staff support (Educational Resource Worker, ERW) for a student in mainstream class is not enough to generate a claim, but difficult to provide two-to-one (2:1) support all day, especially for smaller schools who may only have two ERWs in the entire building. In some cases, DPCDSB is not able to submit claims for students with complex needs because there is not enough staff support in place. The SIP funding needs to be addressed to ensure it covers the entire cost of two support staff.

Consideration for the Ministry to update the Categories of Exceptionality, as they have not been updated in many years. These descriptions are outdated and could be contributing to differences in reporting by the district school boards.

Appendix H reporting of staff aligned with Special Education services should be reviewed by the Ministry. There does not seem to be a consistent approach to reporting of support services staff which makes school board comparisons very difficult to interpret.

Consideration for flexibility and additional funding to support the needs of newcomers to all regions.

- 3. Efficiencies and Reducing Administrative Burden
- How can the Ministry best collect data from school boards in the following instances:
  - Information that is infrequently requested (e.g. during the pandemic, to support central bargaining).
  - o Programs particularly in the early stages of transition from REP to Core Ed.

Although the implementation of the Transfer Payment Ontario System (TPON) Online Platform has provided some efficiencies around the reporting process, there are still possible areas of improvement. For example, the TPON functionality should allow for notifications, workflow management and delegation. It would be ideal if the system could allow Multi-Project Transfer Payment Agreements (TPA) to be shared with different program owners for review and acknowledgement prior to final sign off by the Director of Education.

If, and when, infrequent information is required, the ideal for school board staff is to request limited amounts of data at one time and provide clear direction and purpose for what is being collected.

The Ministry transfers REP funding programs into Core Ed to streamline funding and reduce administrative burden for school boards. A REP usually exists for a number of years before the Ministry makes a decision to permanently fund through Core Ed, and the Ministry would have a good understanding of how the funds have been used. Reporting in the early stages of transition would not be necessary.

• Are there other areas where there is potential or opportunities to find new reporting efficiencies, within EFIS or other reporting requirements to the ministry?

Have one common source data management system where information could be extracted from the core financial system instead of having to layer different types of reporting and different systems. Common platform would also apply for student information used in the Education Financial Information System (EFIS) reporting package and other reporting templates.

The Ministry should be able to use data from EFIS, OnSIS, VFA facilities reporting and Student Information Systems to consolidate data for their own use without having to ask school boards.

The reporting requirements between the EFIS and other ad hoc reporting throughout the year should be streamlined, condensed and simplified. The Ministry may also consider aligning REP reporting deadlines to financial reporting timeframes to streamline the financial reporting involved. The functionality and capability of the TPON platform should be enhanced to allow for notifications, workflow management and delegation. For example, for the Multi-Project Transfer Payment Agreements (TPA), the ability to assign or tag program owners to review and acknowledge TPA prior to final sign off by the Director of Education or designate would improve efficiencies. For TPA funding announced after the first quarter of the school year, sufficient time should be provided to allow for the use of the funds or flexibility to defer revenue. It has been a challenge to achieve full funding utilization, especially when the funding is used to hire additional staffing, as recruitment efforts and finding the right talent can take time.

#### 4. Community Use of Schools

- What criteria do you use to determine rates for use of school space?
- What criteria do you use to prioritize access to school space, if any?
- How do you make your rates and access policies known to the public?
- What criteria do you use to identify which schools are available to book?

In the determination of rates for use of school space, DPCDSB uses the Cost Recovery Calculator that was provided to school boards for this purpose.

There is some prioritization of access to school space based on returning groups. If groups held permits the year before, they are the first to be offered their original schools and time slots. Any requests from new groups are reviewed on a first-come-first-serve basis with priority given to registered youth non-profit groups ahead of for-profit or adult groups.

The public is made aware of DPCDSB rates by electronic communication that is sent in the spring to all permit holders, current and past. The rates are also posted on the DPCDSB website under Community Use of Schools.

All DPCDSB schools are available to be permitted, as long as there are no restrictions due to school activities, construction work or renovations taking place.

#### 5. Student Safety and Well-Being

The Urban and Priority High Schools Program (UPHS)

#### For those school boards that receive this funding:

- Do you conduct any independent evaluation of the effectiveness of funding such as UPHS?
- Are there any areas where funds are underutilized or overutilized?
- Are there any gaps that the current UPHS funding levels can't fill?
- Are there any emerging needs that UPHS could be better positioned to address?

It has been many years since the province reviewed Urban Priority Grants. There may be new communities that would benefit from additional funding as the demographics and social determinants of health and well-being across our geographical areas have changed dramatically.

- Safe and Accepting Schools For those school boards that receive this funding:
  - What portion of your school board funding is generally dedicated to offering suspension and expulsion programming as required by PPM 141 and PPM 142? And how much of this funding supports prevention, positive behavior supports and alternatives to suspension programming?
  - How is the funding generally split across the two elements (staffing versus programming supports) in your school board?

DPCDSB has 6.0 FTE teachers assigned to operate our suspension and expulsion programs. In addition, in order to operate these programs efficiently, meet student needs and work toward finding greater success, DPCDSB has diverted other funding sources to have another 3.0 FTE in place.

Support staff, including ERW, Child and Youth Worker (CYW) and Social Work, are essential components of these programs. The current allocation meets minimum criteria, but having additional CYW and Social Work support could result in an increased ability to maintain student engagement and work on addressing the non-academic needs of students.

Are there any emerging needs that your school board is addressing through this funding?

Post pandemic, there appears to be an increase in the non-academic needs of students. Students benefit from support in the area of positive decision making, peer-relationships, conflict resolution and digital citizenship. The allocation of ERW, CYW and Social Work remains the same, but with the increased need, not all objectives can be met. This is inclusive of all grade levels 4-12.

There has been a perceived increase in violence in schools and funds available are being utilized to address this issue by providing de-escalation training to multiple employee groups and support the needs of schools when Violent Threat Risk Assessments are required. An extensive list of supports and interventions is provided to the school in order to address student needs.

 Is there enough flexibility within this component to address student behavioural needs in your school boards and suspension and expulsion policies/programming?

Funding currently earmarked for both preventative and reactive interventions for students are insufficient. The requirements of the enrolment register limit the ability to provide flexible programming for students. The expectations outlined in PPM 145 section 7 are challenging due

to insufficient staffing, including secretarial staff. The requirements of the Ontario Health and Safety Act (OHSA), surrounding workplace violence also pose challenges particularly related to privacy and the presence of students within the workplace that have various needs that would require safety interventions.

#### Additional Feedback:

#### **Moratorium on School Closures**

Underutilized pupil spaces at DPCDSB schools has now increased to over sixteen thousand. This is the equivalent of being able to close over 30 elementary schools of 500 pupil place size. DPCDSB needs the ability to close schools in order to address efficiencies in operations and cost reductions. The DPCDSB requests that the school closure moratorium be lifted so that school boards can review schools with low student enrolment. These schools face programming challenges that limit student pathways and extracurricular choices. The lifting of the moratorium would also help facilitate efficiencies in operations, long-term planning and prudent utilization of resources.

#### **Inflation Pressures**

The Ministry needs to address inflationary pressures coming through technology and software costs, audit services, legal services and salaries. Some software costs have increased as much as 50% year over year for core systems that would be very costly to convert to an alternative provider at short notice, Boards are left to absorb the higher pricing for core operating systems. Inflationary pressures also apply to maintenance, construction and health and safety requirements which are also lagging in corresponding funding adjustments.

School Board Administration Funding does not recognize salaries required for highly skilled workforce positions, particularly in the Greater Toronto Area (GTA). Average salaries for certified professionals in finance, human resources, employee relations, planning, technology and communications exceed benchmark funding. School boards are losing experienced staff to other sectors because of the dramatic difference in job-related salaries. Recruitment of skilled professionals is also becoming increasingly difficult as school boards cannot compete with current levels of compensation.

## **Legal Costs**

The Uniform Code of Accounts requires all legal expenses to be mapped to School Board Administration despite no identifiable source of funding within the grant model. As a large urban school board within the GTA, there are significant legal issues, with outcomes that can be precedent setting on a provincial basis. Human rights and special education legal concerns are increasing exponentially. There should be a funding source specific to legal issues.

#### **Cybersecurity and Protection of Information**

In recent years, school boards have had to manage security issues and threats. Targeted funding is needed specifically for safety and security in schools and board offices: cybersecurity protection and insurance, improvements to public address (PA) and video surveillance systems, door access systems, security in

response to issues or threats, media/communications resources to draft system messages and monitor social media posts related to Board activities.

#### **Absence Management**

A significant cost pressure on all school boards is absenteeism, from both a financial and operational perspective, and the impact is felt across all employee groups. The absence of classroom staff increases the cost of supply coverage and leads to internal pressures as it is difficult to find enough qualified staff on a daily basis to fill the absences. School boards had anticipated some changes in the last round of central bargaining, but that did not happen.

## **Equity, Diversity and Inclusivity**

Providing funds to broaden the capacity of administration and teaching staff in the area of equity and inclusivity would help address the needs that come forward from communities and advocacy seeking groups. Through the Multi-Year Strategic Plan (MYSP), DPCDSB has confirmed a commitment to ensure that all learners in our community are treated with respect, dignity and are supported to reach their full potential by acknowledging structural barriers in our policies and practices. The removal of barriers requires the acknowledgment of racism, discrimination, and in particular anti-Black discrimination, as historic, pervasive, institutional, and systemic. This work requires a deep and meaningful shift in policies and practices in a manner which changes circumstances and outcomes for those communities most impacted. This work requires resources both financial and human. In order for school boards to sustain this work in the manner it requires, specific and enveloped funding is necessary. As with the Indigenous Education funding, DPCDSB is requesting that protected funding for dismantling anti-Black racism be considered as part of Core Ed funding.

## **Unfunded Statutory Benefits**

The Ministry has not funded the increases in statutory benefits since 2021-22. The CPP maximum pensionable earnings and employer rate increased by 0.25% in 2021 and thereafter each year. Starting in January 2024, a second earnings ceiling limit was introduced, that requires incremental employer CPP contributions. These increases resulted in additional budget pressures, which has been growing since 2021-22 with no funding increase. The projected in-year additional budget pressure for 2024-25 is about \$3.0 million. This is an added pressure under DPCDSB's already difficult financial position.

Funding from the ministry is needed to cover the mandatory cost increases. In addition, the incremental employer contributions for OMERS pension have not been funded by the Ministry. Starting in January 2023, non-full-time employees were eligible to enrol in the plan and this plan change has increased DPCDSB contribution costs annually.

# **Funding to Support Process Modernization and Technology**

As school boards endeavour to modernize and automate processes to become more efficient and effective, funding is needed to complete this work. Many school boards do not have the financial ability to take on these large and expensive projects. Examples include funding to support digital classrooms, devices for each student and staff member, online resources, accessibility needs, security systems and cameras, and many more. There needs to be a mechanism for the Ministry to provide this funding or an option for boards to submit business cases for funding to support these important improvements.

## **Long-Term Disability**

For DPCDSB, the employer-funded LTD plan has impacted our ability to move forward with services and resources that are needed across the system. The cost-prohibitive plan has taken all accumulated surplus funds, caused our Board to be in an accumulated deficit financial position and decimated our ability to address needs that are good for students, staff and communities. DPCDSB was subjected to an external financial investigation, required to report on a monthly basis and continues to operate under a Financial Recovery Plan (MYFRP) with the Ministry of Education. DPCDSB is faced with daily cashflow concerns, a significant amount of borrowing at high interest rates and a potential risk of losing support from financial institutions. 2024-25 represents the fourth year under the MYFRP, however the path forward to achieve a balanced position is still not clear.

#### **Summary**

Thank you for the opportunity to submit feedback on education funding for the 2025-2026 school year.

The Board of Trustees of the Dufferin-Peel Catholic District School Board

| Luz del Rosario (Chair)           | Paula Dametto-Giovannozzi | Mario Pascucci                        | Herman Viloria                             |
|-----------------------------------|---------------------------|---------------------------------------|--|
| Mississauga Wards 6 & 11          | Caledon/Dufferin          | Mississauga Wards 1 & 3               | Mississauga Wards 2 & 8                    |
| <b>Thomas Thomas (Vice-Chair)</b> | Darryl D'Souza            | Stefano Pascucci                      | <b>Shawn Xaviour</b>                       |
| Mississauga Ward 5                | Brampton Wards 2, 5 & 6   | Mississauga Ward 4                    | Brampton Wards 7-10                        |
| Brea Corbet                       | Bruno lannicca            | Anisha Thomas Brampton Wards 1, 3 & 4 | Raheem White                               |
| Mississauga Wards 9 & 10          | Mississauga Ward 7        |                                       | Student Trustee                            |
|                                   |                           |                                       | <b>Jia Sharma</b><br>Student Trustee       |
|                                   |                           |                                       | Bailey Clyne<br>Indigenous Student Trustee |