Minister of Education Jill Dunlop minister.edu@ontario.ca Deputy Minister of Education Denise Cole EDU.DMO@ontario.ca

Honourable Ministers,

We are a group of parents that have grave concerns about the Elementary Program Review (EPR) currently underway in the Ottawa Carleton District School Board (OCDSB). The OCDSB's approach is not in the spirit of the Ministry's guidelines for accommodations, and does not provide the opportunity for our communities to provide meaningful consultation on one of the most impactful aspects of our children's lives – their education. We have concerns that the OCDSB is not following good governance, is failing to fulfil its duty to consult, and has a lack of transparency for key evidence. We are asking that the Ministry of Education review the proposed changes and the consultation process undertaken by the board, delay this vote (scheduled for April 29th), ensure that our communities get a real opportunity to provide meaningful input AND have it considered by the OCDSB.

Although the scope of the change is enormous (over 120 schools affected, 11,000 students will change schools in one year, along with an unknown number of teachers, staff, administrators and educational assistants), the OCDSB has declared this change to be exempt from the Pupil Accommodation Review Guidelines (PARG). It seems as though conscious efforts have been made to keep schools from losing more than 50% of their enrolment, while getting as close as possible to this number (ie several schools will lose 48-49%), using practices such as mandatory grandparenting that will force siblings to attend separate schools.

The OCDSB has a published policy similar to PARG, Pupil Accommodation Review (<u>Policy</u> <u>P.118PLG</u>, section 5.4) where they list only needing to present "one or more" options, as opposed to the Ministry of Education's minimum standard of three options. The OCDSB's own policy indicates that the option(s) should include detailed supporting rationale, including how student transportation would be affected, if capital investments are required, and how they will be funded. None of these elements have been provided, nor has costing been done.

School boundaries are being changed across the city in illogical ways (hundreds of families who live within 200 meters of their school are being reassigned to be bussed to schools that are 3 km away), ignoring guiding principles of the EPR such as creating community schools, walkability, reducing reliance on bussing, and smoothing out variation in schools' Utilization Factors (UF). In several cases, schools which have a lower than ideal UF and are well equipped are losing students to a nearby school that is already over the ideal UF. Knoxdale Public School (PS) students are being moved to Manordale PS, resulting in Knoxdale's UF decreasing from 68% to 61%, and Manordale's UF increasing from 83% to 105%. In another example, K-3 students will be moved from Kars on the Rideau PS (taking a school built in 2011, with capacity of 746 and a purpose-built primary wing, changing it to a Grade 4-8 school, and lowering its UF of 85% to 44%) to North Gower PS, increasing NGPS' UF from 46% to 108%. Overall, these sweeping changes that will cause severe impacts for so many families result in only small decreases in overcapacity schools (from 33 to 25) and under capacity schools (from 24 to 19).

Individual Education Plans and lack of transition planning

One of the largest issues with the EPR involves individual education plans (IEPs). The EPR impacts thousands of students with IEPs. However, with 6 weeks left before the trustees' final vote on this change, the only information given by OCDSB Director Pino Buffone to parents of affected students has been that "IEPs have existing transition plans attached, and will transfer over to the new schools in September 2026." We believe this does not follow the requirements of Policy/Program Memorandum (PPM) 156, as any existing IEPs could not have predicted the wholesale changes that the EPR is proposing. Major changes to the environment, school and method of transportation for many students with IEPs can be deeply unsettling and for some, will have a severely detrimental impact on their education. The board is not providing these families with appropriate information, or assurances that the needs of their students will be able to be met during this rushed and ill-informed EPR.

Misleading and inadequate consultations

The initial consultation report was published in September 2023, and was based on the feedback of 4,294 respondents. It is important to note that many students impacted by this EPR were not attending OCDSB schools in 2023, and those families may not have had the same opportunity for engagement and input on the proposed plan.

Early public consultations occurred in May of 2024. However, the communication about the upcoming changes was very high level, and mostly focused on special programs. There was very small turnout at these events: 280 participants over 7 public meetings and one virtual meeting. Participants at these meetings were asked three questions:

- 1. What factors are or were important to you when choosing the program(s) for your child(ren)?
- 2. How has your child's experience been in their program(s)?
- 3. What changes to the current program model could enhance learning for students today and for future generations?

However, these consultations did not discuss major boundary changes, or a return to middle schools. Participants in these meetings state that the <u>publicly released consultation report</u> misrepresents the feedback that was given in an overly positive tone, omitting any criticism, and that the current EPR does not address the feedback that was given at these consultations.

The information about sweeping boundary changes was only released to the public on February 28, 2025, with the final trustee vote scheduled for April 29, 2025. The extremely short time frame between publishing these changes and the trustee vote suggests that the public consultation at this stage is performative, and not intended to change the plan in any meaningful way. Since the release of concrete information, there has been a groundswell of parents reaching out to the OCDSB, trustees, elected officials, and anyone else they can think of, to let them know that we have grave concerns with this plan. However, at the time of writing this letter, Director Buffone has stated that the review period cannot be extended, and all aspects of the EPR must be voted on together less than 2 months from now.

Increasing transitions and reversing recent changes

In 2017, the OCDSB made major changes to eliminate middle schools and move to a K-6 / 7-12 model wherever possible, as <u>their own data showed that fewer transitions are better for</u> <u>students</u>. Studies published as recently as 2024 show that <u>students with disabilities who move</u> to middle school have documented negative effects.

Despite this data, and all of the work and cost that was involved in eliminating middle schools just 8 years ago, the OCDSB is now reversing course and splitting schools into multiple grade variations: K-3, 4-8, K-6, K-8, 7-8, and 7-12. The current purpose-built facilities at schools do not seem to have been taken into consideration when assigning these grades. For example, Woodroffe Avenue PS and Kars on the Rideau PS each have 5 purpose-built kindergarten classrooms and a kindergarten playground, and both have been scheduled to become a Grade 4-8 school. These changes will require that money be spent on renovations, instead of delivering education.

Not only does this approach increase the number of transitions for students and their families, but the capital costs associated with changing these schools have not been shared with the community or the trustees. There has been no costing done to demonstrate that this is a financially feasible option for the board. It should need to be an exceptional savings created by this plan for it to go against known published research that outlines the harm on students caused by transitions, but there is no way to assess whether this is true. Given that the OCDSB has been in deficit for several years and has been using its reserves, it is even more critical for any plan to be costed, to make sure it is fiscally responsible.

School Trustees

A final concern is whether school board trustees have been given all of the information needed to fulfil their fiduciary responsibilities, and whether they are acting in an unbiased manner.

Trustees have been told that they will receive general information on how bus routes, daycares, and extended day programs will be impacted on April 22nd, and are expected to vote on the entire EPR proposal five business days later, on April 29th. As previously stated, <u>no</u> costing has been done to show whether these changes are affordable or result in cost savings, and no one knows the extent and costs of required retrofits. Additionally, trustees have stated in writing to their constituents that they have been counselled by the OCDSB not to assign any weight as to whether parents will move their children to another school board in their decision.

While some trustees are engaged and communicating with parents, one trustee is out of the country and cannot meet with parents during this crucial time. Another has declined to take part in any meetings with parents, replying only with a generic email response. A third trustee has mentioned feeling pressured by the board to vote 'yes', being told by Director Buffone that different issues in the EPR cannot be voted on separately, and that it is 'the only chance to make this happen'. Several other trustees have indicated their intention to vote 'yes' to this plan, regardless of parental engagement and feedback.

What is the point of electing school trustees, when they act solely as a rubber stamp for the decisions made by the Director and the planning committee? The parents represented by these trustees have been effectively disenfranchised, as they do not have a voice at the table.

Conclusion

An Ottawa Citizen newspaper article from May 2024 is attached and quoted below.

"The French immersion model is likely to change, more special needs students will probably be integrated into local schools, some programs may be cut and more students will go to their local school"

This quote shows that even the veteran reporter covering the consultations in detail was not aware of the scope of the proposed updates, particularly as it related to the re-creation of middle schools and countless boundary changes.

Board chair Lynn Scott stated that "we hear over and over again that people would prefer to send their kids to the school down the street where they can walk rather than having them bus halfway across town."

As OCDSB will not release even general bus information until April 22, it is impossible to state whether reliance on buses will decrease. However, dozens of parents attending public meetings in February and March have told the OCDSB how boundary changes are sending their children away from walkable schools, to be bussed several kilometres away. This is not sustainable, given major difficulties in staffing bus drivers, and is completely in contravention of the board's primary stated goal of creating walkable community schools.

Dr. Nili Kaplan-Myrth said that this is a 'transformational change based on human rights and equity. We can't do that bit by bit so that it takes another generation of children to get through and to actually have their needs met.'

However, it is *precisely* the enormous scope of this change that we believe requires more consultation, more options, and a longer timeline. This generation of students have already been impacted by the COVID-19 pandemic and online learning; they should not have their formative years further disrupted by a hastily-planned overhaul that will affect every part of their lives. They deserve better than a process that, two months from the end of its consultation process, still has the Director of the OCDSB telling parents "we'll figure it out as we go."

Thank you for your time, and any help you can provide with these changes.

Sincerely,

Concerned Parents of the Ottawa Carleton District School Board

Cc:

- Doug Ford, Premier of Ontario
- Michelle DiEmanuele, Secretary of the Cabinet and Clerk of the Executive Council for the government of Ontario
- Scott Allinson, Chief of Staff to the Minister of Education
- Justin Saunders, Director of Policy for the Minister of Education
- Jodi Zimbel, Senior Manager of Capital Policy for the Minister of Education
- Didem Proulx, Assistant Deputy Minister, Capital and Business Supports Division at Ministry of Education
- Paige Young, Executive Assistant to the Minister of Education
- Anne Sealey, Executive Assistant to the Deputy Minister of Education

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