Toronto District School Board Submission

The Toronto District School Board (TDSB) is Canada's largest school board and one of the largest in North America. As one of the most diverse school boards in Canada, we serve approximately 238,000 students in nearly 600 schools throughout Toronto, and more than 100,000 life-long learners in our Adult and Continuing Education programs.

Due to the size of our student population and scope of operations, the TDSB has significant needs to support safe and modern learning environments that offer appropriate special education supports, resources to support mental health, well-being and safety, and access to reliable and up-to-date technology for all students. Current funding gaps for supporting student achievement, mental health and well-being must be addressed to adequately meet existing needs.

Below is a response to the Ministry's specific questions, followed by sections that outline the funding needs in priority areas where the Board feels additional support would improve the academic achievement and well-being of students.

Executive Summary

The Toronto District School Board (TDSB) is committed to creating learning environments where all students can achieve, belong and thrive. As Canada's largest school board, we have significant needs to support safe and modern learning spaces that offer appropriate special education supports, resources to support mental health, well-being and safety, and access to reliable and up-to-date technology for all students.

Currently, existing funding gaps are having an impact on student achievement, mental health, and overall well-being. These gaps must be addressed in order to effectively meet the evolving needs of students across TDSB schools.

This year's submission both addresses questions from the Ministry of Education and focuses on some key areas for change, from core education funding model reform to strengthening special education as well as student and staff safety and well-being.

Our submission also focuses on additional priority areas for funding support, such as strengthening cyber security, lifting the moratorium on school closures and improving investments in devices and digital resources for students. It also identifies a need to increase funding for curriculum supports and professional development to align with the Ministry's Student Achievement Plan. Expanding support for Caring and Safe Schools, so that they have wrap-around services to support students in a rapidly changing world is also a top priority.

At the core of this submission, is the desire to keep pace with the changing dynamics and needs of our school communities, while upholding student academic achievement and well-being so they can access their own pathways to success.

The TDSB is grateful for the opportunity to provide feedback on how we can create a better future for our students and the diverse communities we serve across nearly 600 schools in our region.

CORE EDUCATION FUNDING MODEL REFORM

Considerations

i. Now that the Core Ed funding model has been implemented, please provide your feedback on the reform. For example, did it achieve (or in time do you expect that it will achieve) the two goals set out above of simplification and strengthening accountability?

Response:

Reducing the amount of funding streams down to six was helpful, however there is still a significant amount of detail within each stream that will be difficult for the average stakeholder to navigate and understand.

For example, the Classroom Staffing Fund and Learning Resources Fund both have allocations for staffing and we report on staffing separately. When stakeholders want to understand the total amount of funding for staff that support instruction in schools, this information is not consolidated, making it difficult for them to see gaps in funding versus expenditures. While school boards have some discretion on how to spend un-sweatered funds, this too is not transparent for stakeholders.

Additionally, funding benchmarks do not keep pace with inflation and labour costs. This puts pressure on school boards to realign resources to cover these unfunded amounts and causes a further challenge around how we report this misalignment, so that stakeholders understand how our resources are being used. Overall, this leads to tensions between how school boards and the Ministry present information to the public, further confusing and frustrating parents and communities who want clarity around how resources are used.

ii. In the refreshed enveloping framework, the ministry introduced limits on funding that can be applied towards student transportation and school facilities expenditures. What opportunities or challenges is this presenting to school boards?

Response:

While these challenges may be different for each school board, there are some common issues around transportation. School boards need the support of the Ministry to address costs that are outside of their control, such as contract cost increases related to securing school bus operators.

Boards must be able to adequately attract and retain drivers to meet transportation needs and this is especially challenging in urban centres where the cost of living is high. Funding needs to be sufficient to support stable and equitable transportation services for all students who need it, to ensure there are no barriers to an education based on student postal codes.

The additional challenge for school boards will be dealing with limits placed on facilities-related expenditures for maintaining and operating aging infrastructure and excess capacity. Providing safe and effective learning environments for students will be challenging with limited resources under the current funding scenario. It is critical that school boards are given all the tools to manage costs, including:

- Funding that matches current economic realities;

- Lifting of school closure moratoriums so that small/under-utilized schools can be consolidated and not drain board resources; and

- Improved capital funding to address the renewal backlog and thereby impact maintenance work which impacts facilities funding.

iii. Are there other ways in which school board accountability can be further enhanced, either through the Core Ed Funding model itself or other mechanisms?

Response:

The TDSB recognizes the importance of stakeholder engagement in budget development. During this process, stakeholders are consulted and have access to all budget documents on the TDSB's website. Additionally, the TDSB reports on its expenditures on a quarterly basis, using current Ministry templates. On an annual basis, the TDSB also prepares and publishes a *Financial Facts* document, outlining the current projection and previous four years of financial and statistical information.

The Ministry should consider reducing the reporting requirements for Responsive Education Programs (REP) by, for example, requesting only one consolidated year-end report instead of multiple reports with different timelines. These numerous reporting requirements require significant administrative work to support tracking and completion. The Ministry of Education should consider providing funding for administrative costs to support these programs.

As well, the Transfer Payment Ontario Online Platform functionality and capabilities should be enhanced to allow for notifications, workflow management and delegation activities. For example, the ability to assign or tag program owners to review and acknowledge agreements before required sign-off from Directors of Education would enhance efficiencies for Multi-Project Transfer Payment Agreements (TPA).

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 offer flexibility to defer revenue. It has been a challenge to fully utilise funds especially when the funding is used to hire additional staffing, as recruitment efforts and talent acquisition take time. For example, the timing around which the summer program guidelines were released in May, 2023 created time constraints that impacted the hiring process.

In future, if the Ministry should implement additional reporting to support stakeholder accountability within the funding model, school boards must be able to provide information in a

format that shows where funds are allocated to accommodate both regulatory requirements and board supported programs and operations. This applies to the scenario where school boards need to allocate additional funding to support programs that are not fully funded by the Ministry, such as statutory benefits.

Stakeholders need to be able to understand how limited resources are used to support students. Currently, school boards are left to explain to stakeholders why there are not sufficient resources available to support students and a clear alignment of the use of funds would address this issue.

    iv. In the 2024-25 Education Finance Information System (EFIS) Estimates reporting cycle, Data forms B, C, and D were suppressed. These schedules provide detailed information on school board expenditures versus funding allocations. Should the ministry re-introduce these forms in the future, what are key considerations to ensure consistency and comparability between school boards that would provide meaningful information to the ministry?

Response:

As stated above, providing stakeholders with accessible information on how funding is used by school boards is important to maintain confidence in public education. The Ministry has stated previously that outside of sweatered funding, such as class size regulations and special education expenditures, boards have the flexibility to use funding to support local needs. Therefore, reporting for both the associated revenue and expenditures needs to be flexible to accommodate this reality.

Where funding is "sweatered," boards should be able to provide the appropriate expenditures details at a program level to demonstrate how they were utiliized. Where there is local decision making around the use of funds, these funds should be noted and the programs must be identified. This way boards could highlight both the cost of regulated expenditures as well as the remaining flexibility of funds to support locally developed programming to enhance student achievement and well-being. Reporting on transportation, facilities and administration should clearly define cost of labour, contracts, utilities and maintenance.

SPECIAL EDUCATION FUNDING

Considerations

    i. School boards are given flexibility to use the Special Education Fund and other funding to support their special education policies and priorities to meet local priorities. How are school boards prioritising 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?

Part 1: How are school boards prioritising ministry supports to meet the special education needs of their students?

Response:

The TDSB provides a range of placement options in integrated and congregated sites for each of the following:

Regular Class:

- Indirect Resource Support

- Resource Support (Elementary)

- Withdrawal Support

Special Education Class:

- Intensive Support Programs (ISP) – Developmental Disability, Autism, Learning Disability, Diagnostic Kindergarten, Gifted

The TDSB also has the following in place to meet the special education needs of students:

- Utilizing a Tiered Support Model and Regional Support Teams for Autism, Behaviour Prevention Intervention, and Deaf/Hard of Hearing and Blind/Low Vision.

- Providing specialized teams to support an intersectionality of diverse learners, including: an Autism team, Assistive Technology/Specialized Equipment Allocation Team, Behavior Prevention Intervention Team, specialists on Blind Low Vision and Deaf Hard of Hearing, consultants, coordinators which take a multidisciplinary approach and include teachers working alongside Occupational Therapists/Physiotherapists, Speech Language Pathologists, Social Workers, Psychologists, technicians, behaviour analysts, audiologist, etc.

- Offering specialized training, including an ABA instruction, trauma-informed approach to supporting students with autism, equipment (e.g., sensory kits, computers, OTPT equipment, BLV, AAC), software (e.g., specialised communication apps, assistive technology, communication software)

- Building capacity of all TDSB staff through initiatives such as professional learning, coaching, mentoring and providing resources.

- Providing a variety of accessible tools/technology for students to access and engage in learning.

- Leveraging community partnerships to support student needs and build staff capacity/professional learning.

However, the overall funding is not sufficient to meet the needs of students who are supported through the Special Education Department, as demonstrated through the current scenario where school boards have to use other funding sources to support these students.

6

Part 2: What other Core Ed funding are boards using to complement their Special Education Fund?

Response:

School boards are using their other academic allocations to support students due to the underfunding of special education, in particular, the Classroom Staffing and Learning Resource Fund. Regulation 181/98 and the Ministry prioritise inclusion, but adequate funding is not provided to support inclusion. Additional funding to support student needs through staffing, equipment and training would meet these requirements.

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

Response:

It would be beneficial to offer more flexibility to individual Boards to combine different funding, depending on their local priorities. As well, allowing for more board discretion when it comes to allocating funding based on localized areas that are of greatest need(s), would be helpful.

It would also be beneficial to have more flexibility around staffing allocations, while continuing to reduce administrative burdens on schools and districts by not requiring individualized applications for SIP funding.

iii. 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?

Response:

Conduct a broad re-assessment of how urban priority boards are funded due to increasing trends in the number of students with complex needs who come to the TDSB for programs and services offered in the community (e.g., SickKids, Surrey Place, Holland Bloorview etc.) and from other Boards and areas of the province, that do not provide the same service access.

The Ministry could consider larger data that is already available through platforms such as PowerSchool or OnSIS, to provide the number of existing IEPS, safety plans, ISPs, etc. The Ministry could also provide examples of how different school boards are utilizing these funds to make local decisions and create a working group with membership drawing from Ontario Boards to identify how to best use the funds to serve our students.

EFFICIENCIES AND REDUCING ADMINISTRATIVE BURDEN

Considerations

i.   How can the ministry best collect data from school boards in the following instances:

   a.   Information that is infrequently requested (e.g., during the pandemic, to support central bargaining)
   b.   Programs particularly in the early stages of transition from REP to Core Ed

Response:

a. Consulting with school boards on the requirement up front would give boards time to collect the information in advance of when it is needed or as the event is happening. Too often requests come with short notice and require information collection in a different format than how school boards retain it. Early notice and consultation, where possible, would assist with both improving the information provided and workflow planning.

b. Again, early notice of requirements for data and the format of data will assist the school board in collecting and reporting on a timely basis.

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

Response:

Providing school boards with reporting templates for REP and other data requests in advance would assist school boards in the efficient collection of data during the time that the program is being delivered. Currently, templates are only available a few weeks ahead of the reporting timeline, thereby possibly creating additional work for staff to gather information. For example, the timing of the release of summer program guidelines in May, 2023 created additional constraints on hiring process timelines.

Additionally, creating separate reporting templates at the end of each REP period would improve workflow and approval processes. Currently, staff have to consolidate multiple project information reports into one and spend time seeking review and approvals from the various program managers.

We would also recommend that TPON incorporate workflow processes and tracking capabilities within the software used, so that the boards can assign a section of report to specific staff and track the completion of data inputs to help staff monitor and submit reports in a timely way.

COMMUNITY USE OF SCHOOLS

Considerations

i. What criteria do you use, to determine rates for use of school space?

Response:
At the TDSB, our rental rates are determined by four main factors:

1. Type of space being requested.
2. Type of organisation requesting for the space
3. The group to be served.
4. The program or activity being offered

For weekends, a portion of s caretaking costs are added to the rental fee.

ii. What criteria do you use to prioritise access to school space, if any?

Response:
Based on the mandate and priorities of the TDSB, we give preference to organizations that serve City of Toronto residents. The order of priority is as follows:

1. Programs for children and youth (0 -18 years) with over 75% of members residing within a school community.
2. Programs for seniors (65+) with over 75% of members residing within a school community.
3. Programs for adults (19 - 64 years) with over 75% of members residing within a school community.
4. Other approved non-profit groups with 75% of members residing in the City of Toronto; Other approved groups

iii. How do you make your rates and access policies known to the public?

Response:
We publish our rates on the TDSB's website, along with relevant Community Use of Schools (CUS) policies and applicable procedures. We also provide outreach sessions throughout the year to invite community members and groups to learn more about securing permits to use space in schools and how to use ebase, our permit booking system.

iv. What criteria do you use to identify which schools are available to book?

Response:

Within the TDSB, the majority of schools have space available for permitted use and clients can book this through ebase, a software booking portal. Ebase also has a search feature which allows users to find available spaces before submitting requests. There are a small number of schools that do not have evening caretaking shifts and close at 7 p.m., making them unsuitable for evening or weekend permits.

Additional comments on the Community Use of Schools:

The Community Use of Schools (CUS) grant provides funding to school boards to reduce rates for and/or increase access to school space for community not-for-profit groups during non-school hours. These programs contribute to the building of strong, safe and healthy communities.

The CUS grant should be increased to reflect the true costs of keeping schools open after hours and factor in operational costs for supplies, heating, lighting, and cleaning.

At the TDSB, the volume of not-for-profit groups needing space far outweighs the available funding to offset the increased demand for permit use. In fact, over the last five years there has been a decrease in the CUS grant funding provided to TDSB of 7%, while the number of subsidised programs have increased year to year.

In addition, a further impact to permit-related funding was caused when the Ministry's Priority Schools Initiative (PSI) funding of $2.6M was eliminated in 2018/19. The Priority Schools Initiative was a Ministry funded program that provided free space (no cost permits) in 77 schools to community groups in priority neighbourhoods for eligible free or low-cost programs.

Before its elimination, this funding was also utilised by TDSB to subsidize weekend caretaking costs for permit holders between 8 a.m.- 6 p.m. on Saturdays and between 8 a.m. -3 p.m. on Sundays. This funding was also used to support several community-liaison staff, who worked directly with community groups in high needs neighbourhoods to support and facilitate a range of programs for children and youth in the priority schools.

We would encourage the Ministry to work with other ministries, to seek additional funding to support programs, including funding the permitted use of schools, in particular for high priority communities within the city. This aligns with the TDSB's on-going advocacy for additional Student Safety and Mental Health funding, as part of the Caring and Safe School's focus on violence reduction in schools - by providing a range of after-school sports and recreation programs for children and youth.

STUDENT SAFETY AND WELL-BEING

The Urban and Priority High Schools Program (UPHS)

Considerations

For those school boards that receive this funding:

    i. Do you conduct any independent evaluation of the effectiveness of funding such as UPHS?

Response:
Beyond what schools are required to undertake as part of the final report, there is no further TDSB/independent review process. We stress to schools the importance of student voice and ensuring that this is captured throughout their work.

    ii.   Are there any areas where funds are underutilized or overutilized?

Response:
It could be viewed that funds are overutilized in staffing, however, we do find that additional staff run and support additional programming and support that significantly impact our students.

    iii. Are there any gaps that the current UPHS funding levels can't fill?

Response:
The increasing needs that exist within the TDSB for funding for school-wide initiatives (e.g., UPHS restriction is currently 25%). Many students within TDSB schools are marginalized and underserved by the system for a variety of reasons and could all benefit from UPHS support.

Currently, a good number of TDSB schools are not currently served by UPHS due to restrictions around the number who can access it and they are in need of these resources.

    iv. Are there any emerging needs that UPHS could be better positioned to address?

Response:
There are emerging needs within all of our schools and needs across TDSB schools have increased significantly since the COVID-19 pandemic and amidst other geo-political events

around the world. Enabling access to UPHS across more schools would be especially beneficial for our secondary schools, as a whole.

SAFE AND ACCEPTING SCHOOLS

Considerations

i. 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 behaviour supports and alternatives to suspension programming?

Response:
Approximately 69% and 31% of funding goes toward supporting prevention, positive behaviour supports and alternatives to suspension programming.

ii. How is the funding generally split across the two elements (staffing versus programming supports) in your school board?

Response:
Funding is split across these two elements by approximately 70% for staffing and 30% for programming supports.

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

Response:
In general, there is not enough money to address emerging needs, although we have been able to pay for some additional programming outside of regular school hours in support of student engagement.

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

Response:
The flexibility is not the issue. The issue is that the resources do not go far enough to address the significant needs faced, given the rise of violent incidents in communities which have an impact on our schools.

OTHER PRIORITY AREAS

In addition to answering the Ministry's questions above, we would also like to highlight additional priority areas for the TDSB, as outlined below. Please note that these priority areas are not listed in order of importance.

Priority: Mental Health Supports for Students and Staff

Professional and para-professional support to address student well-being and safety, including social workers. Additional school staff provide a caring adult to oversee all students, alongside mental health supports for students and staff.

Overall, an increase in staffing in Professional Support Services (PSS), including Social Work and Attendance, Psychological Services, Speech-Language Pathologists, Occupational Therapists and Physiotherapist and Child and Youth Counsellors, would benefit all TDSB students and staff. It would improve the Board's ability to meet the mental health and well-being needs of all students across the system, which would lead to decreased wait lists and wait times for these important services.

An increase in PSS staff would also reduce the workload of all current staff, resulting in less burnout, sick leaves, and resignations.

Staff Group	Benefits of Increased Funding
Psychologists and Psychology Associates	• Ability to timing access needs of students • Support marginalised communities and newcomers • Support inclusion of student in regular classrooms
Social Work Staff	• Due to 12-18 month wait times in community agencies additional supports for students in school are needed • Increased need for mental health supports
Speech-Language Pathology	There's a growing demand for Speech-Language Pathology due to: • The Ontario Human Rights Commission (OHRC) Right to Read Inquiry and the resulting demands for SLP expertise in the areas of oral language and literacy at the school and system levels. • The increased need for AAC devices for our most vulnerable students, who are non-verbal. • The negative impact of the pandemic on our youngest students' social, emotional ability to effectively communicate.

	• The increasing number of Human Rights complaints regarding the level of SLP services.
Occupational Therapists and Physiotherapists	• Decrease marginalisation of equity-deserving groups with the highest needs. • Increased capacity building for educators re: proper use of OT/PT equipment that accommodates Special Education and Inclusion needs. • Decrease the number of human rights' complaints pertaining to lack of OT/PT access and supports.
Child and Youth Services	• Increase in support for the mental health needs of students and ability to provide direct service (e.g., short term counselling, restorative circles, etc.)

Priority: Increased Support for Caring and Safe Schools

(Including wrap-around services to support violence reduction in schools and school communities including community-based programming)

All students and staff have a right to feel safe at school and work and the Toronto District School Board (TDSB) remains committed to supporting the safety and well-being of our students and staff. This is a responsibility that is shared by members of our school communities, including all levels of government, police services, and community organisations.

We are committed to working together with students, staff and families to keep our schools safe, with the presence of additional caring adults (child and youth counsellors, school-based safety monitors), and by strengthening connections, maintaining positive relationships, solving problems and promoting respect.

In 2019, the Medical Officer of Health expressed [1] their concerns about community violence to the Toronto Board of Health. The root causes were identified as intersections between poverty, racism, racial/ethnic, and gender inequities; exacerbated by discriminatory and stigmatizing educational practices, counterproductive criminal justice policies, lack of economic opportunity, and broader societal norms that support violence.

These findings are consistent with our own observations and re-affirm our pedagogical approach to support student achievement and academic success by promoting joy, belonging, and engagement in our schools, and by fostering safe, inclusive, and welcoming environments for members of our school communities.

The TDSB has a strong foundation for school safety that we have progressively built on for years. We have among the most evidence-based policies and procedures in Canada to support

student safety and well-being. We have made ongoing and significant investments to resources, staffing and programs and opportunities to connect with and engage students.

The TDSB remains a committed partner to advancing safety and well-being in our schools and calls on the ministry to join in that work by making a meaningful and sustained investment in community safety and well-being. Additional funding would enable the board to increase staff, continue and expand current programs, and take additional steps to address school safety.

[1] Toronto Public Health. (2019). *Community Violence in Toronto: A Public Health Approach*. In their report to the Toronto Board of Health on November 12, 2019

Priority: Funding for Curriculum Supports and Professional Development Aligned with Ministry of Education Student Achievement Plan

Additional Curriculum Support

Additional curriculum support in the form of both resources and staff would have a significantly positive impact on student achievement. The TDSB is grateful for the additional funding to support mathematics and literacy staffing which allowed us to increase our allocation of Early Reading Intervention Specialists Teachers (ERISTs). These teachers work directly in schools supporting student learning in historically underserved communities and those where literacy results have not been at expected levels. The need for these ERIS teachers is significant in supporting student achievement and teacher capacity development. They model and support tier 1 and 2 instructional practices within target classrooms. In addition to this work, these teachers could continue to support professional learning structures with groups of teachers to build capacity. There work could support the monitoring and assessment of marker students over short intervention periods while making recommendations for next steps with the student in mind.

Similarly, funding for creating teachers who act as Math Learning Partners (MLP) in classrooms has been substantial. These roles are similar to coaches but also work directly in classrooms with students and teachers. They are engaging in co-constructing learning with students and staff in classrooms. Both ELIT and MLP have significantly improved competency and confidence in reading, writing and math within these classrooms.

Continued Tutoring Supports

Tutoring supplements educators' significant work in class by providing access to additional support outside of school hours. Tutoring programs empower students to access help with their schoolwork and develop their skills at times and locations that work best for their needs. Tutoring has also helped students strengthen foundational, literacy and math skills and provides

homework help in all curriculum areas. This has been crucial for families without the financial means and social connections to independently access tutoring opportunities.

According to a survey conducted in 2022-2023, parents/guardians/caregivers reported that their children's understanding of class material, confidence in completing assignments, and stress levels significantly improved due to tutoring. Students themselves also noted a positive change in their academic performance, perseverance, and interest in learning as a direct result of tutoring.

Recognizing that each student has unique needs and circumstances, a tutoring plan must be equally diverse. Tutoring can occur in school, in the community, and online, and the types of tutoring offered are determined through local decisions in collaboration with board staff, focusing on communities who have been historically and contemporarily underserved and reflecting student needs. For example, tutoring programs include Intensive Reading Support, Literacy/Mathematics Support, Peer Tutoring, and Online and Community-based tutoring.

Implementing a tutoring plan serving students from K to 12 across the board will require consistent and long-term commitments and funding. In-school programs require time to organize, while external groups need to establish locations, staffing and resources. A dedicated admin team is required to coordinate programs, collaborate with internal and external staff, and monitor progress.

Literacy and Numeracy Increased Supports

Funds could be used to create a central kindergarten support team that would include Speech and Language supports, instructional leaders providing job embedded learning and the creation of demonstration classrooms focused on building capacity in our system. This is particularly timely because there are revisions to the Kindergarten Program that will be in March 2025.

A focus on Later Literacy with instructional teacher leaders providing job-embedded support, teacher training, resources and building a community of teacher-learners to address literacy gaps would also be helpful and a later literacy intervention team would have a significantly positive impact on student achievement.

We recognize the cumulative impact on math learning when a strong foundation in the early years has not been established. Thus far, early years mathematics has largely been addressed through K-12 learning opportunities in TDSB. Much like literacy, math should have early and intensive work early on focusing on high-quality diagnostic assessments such as the Assessment In Mathematics (AIM) K-3 screener which we are currently piloting. Our system would benefit from follow-up programming/support for educators to build their capacity with math content, knowledge of the curriculum, and knowledge of students as early math learners. Through employing ongoing cycles of multi-tiered systems of support (MTSS) with targeted interventions for students who are struggling with early math concepts, we can address

misconceptions in a timely manner at an early age so they do not hamper success in math learning later on.

Funding to Support the Right to Read Recommendations

Additional funding is required to continue the professional training for central staff, principals, superintendents, and teachers. Given the significant number of schools within the TDSB, training for relevant employee groups involved in the instructional process places great pressure on Board finances.

We are committed to implementing the recommendation of the Right to Read report in over 450 elementary schools. A key need is Tier 1, Tier 2 and Tier 3 Literacy supports. With more students requiring higher levels of support, our ability to provide these programs in all schools across the system is limited. In addition to the costs to licensing the Tier 3 programs, there is a need to fund additional staff at each school level to deliver the program requirements with fidelity in terms of number of instructional hours and weeks for evidence-informed implementation. In order to capture the data at the system level, TDSB would require funding for IT departments to work with departments with Power School to integrate our data collection systems.

Additional funding would also ensure that all supports, resources, and professional learning currently in place can continue and be expanded and enhanced to reach more schools, students, and staff.

Funding to Support Professional Development of Staff

Professional development funding to school boards is provided to coordinate and provide leadership development, employee engagement and continuous improvement for all school leaders, system leaders, and all employee groups across the TDSB. Professional development supports both the Board and Ministry priorities as per PPM 151 and the School Achievement Plan. This group includes: Executive Superintendents/Officers, Superintendents, Administrators, Business and Operations Managers, teachers, central and school-based staff, occasional teachers etc.

Additional funding for professional learning is required to enhance opportunities to:

- Promote effective leadership practices in order to have the greatest possible impact on student achievement.
- Further develop leadership capacity and coherence across the TDSB in order to have the greatest impact on students.
- Coordinate and provide leadership development, employee engagement and continuous improvement for all leaders and employee groups across the TDSB to support both the Board and Ministry priorities.

- Address mandatory training requirements for casual and occasional employees.
- Focus on leadership in literacy and numeracy learning, student well-being, curriculum implementation, school health and safety, talent growth and development to support continuous improvement and optimal leading and learning environments.

Priority: Increased Funding to Support Absenteeism and Wellness Programs

The sick leave entitlement changes in 2012, which provided employees with additional sick days per year, has also resulted in a gradual increase in employee absenteeism. This includes short term sick leave, work-related injuries and long-term disability and illness (LTDI). This has resulted in cost pressures for the TDSB such as supply costs, premiums and LTDI claims continue to increase.

Overall, funding has not kept pace with rising supply costs across the sector. This needs to be addressed so that school boards are not forced to reduce other supports for students to cover these costs. As well, to address increasing costs in these areas, school boards require additional administrative resource funding to help manage absenteeism, and ensure staff have the support and accommodations they need to return to work.

Priority: Funding to Support Historic and Current Unfunded Increases in Statutory Benefits

The Ministry of Education has not provided funding to support the increases in statutory benefits that have impacted the system since 2021-22. CPP and EI continue to increase with no offsetting increase in funding. The impact of the annual unfunded increases for both CPP and EI for 2024-25 is anticipated to be approximately $35.2 million for TDSB.

In addition, currently the incremental employer contributions for OMERS pension are not funded by the Ministry. Starting in January 2023, non-full-time employees are eligible to enrol in the plan and it is anticipated that this plan change will increase the TDSB's contribution costs by approximately $0.4M per year.

We ask that the Ministry provide additional funding to support these incremental costs (e.g. employer portion of CPP, EI, OMERS) which the Board has no control over and review the salary and benefit benchmarks.

Priority: 1 to 1 Student Device Technology

The 1:1 Student Device Program for students in Grades 5 and 9 provides students with a district-owned and managed Chromebook for educational use. This device is assigned directly to the student and stays with them over a four-year period, they can take the device home each night, on weekends and over holidays and they are required to bring them to school each day to support their in-class learning. This board-wide initiative supports learning through technology, digital citizenship and our commitment to equity of access to technology.

Ongoing investments in IT hardware devices and digital resources are required to support this program and these technology advancements need to be supported with additional Ministry funding so that school boards can provide a safe and effective learning environment for our students.

Priority: Cyber Security

To have the appropriate technology in place in classrooms to support student learning, achievement and general school board operations, investments in cyber security protection are vitally important in our current environment. Recent audit findings from the Office of the Auditor General of Ontario have also highlighted the need for school boards to improve their cybersecurity and privacy measures.

With the rapid increase in the use of technology and online tools due to the COVID-19 pandemic, additional resources are required to promote cyber resilience, so that students and educators can operate in a safe digital learning environment.

A robust Broadband and Cyber Protection Program will also mitigate risk of loss resulting from cyber threats and incidents. These technology advancements need to be supported with additional Ministry funding so that school boards can provide a safe and effective learning environment for our students as well as adequate protection for all board data and systems.

Priority: Information Technology Infrastructure (ERP)

The speed in which technology continues to evolve has caused school boards to move at an unprecedented pace to upgrade their enterprise systems, which include management of student information, financial data, human resources and providing a seamless experience for students, teachers, administrative staff and families. These upgrades are critical to ensure data security as well as provide operational efficiency. However, the costs associated are substantial. Estimated costs for advanced software solutions, hardware, and ongoing maintenance can increase exponentially based on the size of the school board.

Without sufficient funding, essential upgrades will be delayed. This has already led to staff developing their own workarounds, leading to manual, time-consuming processes.

Investing in these upgrades will provide the educational infrastructure to support innovative teaching and improved learning outcomes. Therefore, we are requesting that additional funding sources be identified and allocated to support these necessary technological advancements, ensuring that the staff at TDSB (as well as other school boards) have access to modern systems that will allow them to deliver the highest quality of support to our students.

Priority: Lifting the Moratorium on School Closures

Since 2017, there has been a moratorium on school closures imposed by the Ministry of Education. The TDSB 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 our students' choices as well as a financial burden to the Board. The lifting of the moratorium would also facilitate long-term planning and a prudent use of resources.

Priority: Addressing Inflation and Cost Increases

All school boards are experiencing high rates of inflation, which are impacting their ability to meet the costs of utilities, materials, repair and maintenance. As we're still in an active construction market, the TDSB is experiencing increased material and labour costs, while grappling with maintenance and renewal requirements related to aging infrastructure.

In addition, non-staffing benchmarks outside of Facilities have not kept up with inflation, increasing pressure on board budgets to provide the same level of service to students.

The Ministry needs to ensure that all funding benchmarks are annually adjusted to take into account increases in inflationary costs in all areas.

Priority: Accessibility in Schools for all Students and Staff

The TDSB is committed to maintaining a learning and working environment which actively promotes and supports human rights and accessibility for persons with disabilities. We are committed to actively removing barriers, whether visible or invisible, so that all members of our community can fully participate in TDSB activities. We have a variety of policies and procedures in place for staff, students and community members that ensures compliance with the Accessibility for Ontarians with Disabilities Act. Funding is required to continue to support this important work.

While all new TDSB schools are designed to meet or exceed current accessibility standards, most older schools were not built with accessibility in mind. These sites include significant barriers to students, educators, parents/guardians, and visitors with disabilities, including those who use mobility assistance devices and who have low vision or hearing. In 2014 and 2015, the TDSB audited all its schools and created site-specific profiles. In total, 160 buildings have been categorised as accessible, 78 as somewhat accessible and 332 as not accessible. Most of the TDSB administrative centres are not barrier-free accessible, including the board's head office at 5050 Yonge Street.

While accessibility improvements are regularly made, projects are selected based on the priorities identified in the Repair Backlog, not by considerations related to systematic inequities in accessibility. A related constraint is that School Condition Improvement (SCI) funding cannot be used to improve accessibility if the space is not listed in the Repair Backlog. For example, there are frequent requests for ramps and elevators, but if they do not already exist, SCI funding cannot be used to install them.

Boards need dedicated and consistent funding to undertake accessibility upgrades over the next ten years to add new elevators, ramps and make accessible other spaces such as swimming pools/gymnasiums, auditorium, speciality and tech program spaces. TDSB has estimated a need for $10M/year to undertake accessibility upgrades with the goal of improving existing designated schools and to gradually increase the number of sites with this designation so that there are more pathways for students as they move through the school system.

Priority: Adding and Improving Ventilation in Schools

The TDSB continues to invest in several areas to improve ventilation in schools and keep students and staff healthy. This includes replacing older, ageing ventilation equipment and building automation systems and maintaining over 16,000 institutional-grade HEPA units in schools to enhance air cleaning in every occupied classroom, portable, resource room, as well as other instructional spaces that do not have mechanical ventilation. In addition, TDSB continues to maintain regular filter changes in existing ventilation systems and to specify MERV 13 filters for any new mechanical equipment.

As per the comments regarding dedicated funding for Accessibility Improvements, the TDSB requests the Ministry consider providing a consistent, dedicated funding source to add new ventilation systems to schools/classrooms that do not currently have ventilation. In a recent facility survey update, TDSB identified 93 schools that do not have mechanical ventilation in classrooms, where students spend the majority of their day. Adding new ventilation equipment and systems would not be eligible under SCI funding and the School Renewal Allocation (SRA) funding is not sufficient to undertake a systemwide program to add new to these schools. Therefore we ask the Ministry to provide dedicated, multi-year funding for schools/classrooms that do not have ventilation.

We ask that the Ministry please consider and accept the funding recommendations laid out in this submission to ensure that the Toronto District School Board receives adequate funding to ensure all students have access to the programming and support required to achieve academic success in their chosen area of study.