

In response to the 2024-2025 Education Funding Consultation Guide and process, the Board of Trustees of the Dufferin-Peel Catholic District School Board (DPCDSB) wish to highlight the ongoing financial concerns associated with having a fully-funded Long-Term Disability (LTD) Plan. DPCDSB is working with the Ministry under a Financial Recovery Plan that requires assistance from the Ministry to address.

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

## 1. Strengthening Accountability and Enhancing Transparency

- **What reforms can be made to the GSN funding formula to:**
  - **Reduce its complexity?**
  - **Enhance the transparency on how school board funding is used?**

The GSN funding formula is based on a series of foundation grants and special purpose grants. Enveloping provisions and restrictions on expenditure categories add to the complexity of the model. A complete review of the GSN funding formula is recommended to address inflationary cost increases, outdated benchmarks, societal demands and provincial initiatives. 2002 was the last time an independent review was conducted on the entire funding formula.

The DPCDSB supports accountability and transparency, however school boards have experienced an increased administrative burden in providing this reporting and information requested from the Ministry of Education. Capital reporting requirements alone are staggering: the ventilation optimization reporting, the detail reporting of the COVID-19 Resilience Infrastructure Stream (CVRIS) funding, capital priority submissions, property inventory review and VFA updates. There is an impact on the limited staff resources available to do this work. This is evident in many other areas of the school board as well, including special education and learning services, human resources and financial services.

- **What opportunities are there to strengthen accountability while balancing administrative requirements?**

As noted above, school boards provide significant amounts of information to the Ministry of Education and to communities. It would be beneficial to know if communities are looking at the reporting provided or not. Much of the information shared is reported on Ministry systems; in some cases, it may be possible for the Ministry to extract data and provide reporting for all Ontario residents.

- **What opportunities exist to better communicate to taxpayers:**
  - **How GSN funding is allocated to school boards?**
  - **How school boards use GSN funding in alignment with government priorities?**

All school boards have parent councils and central committees for parent councils. These dedicated individuals want to support their schools and their school board. This is the perfect audience for the Ministry of Education to provide training and educational materials that will foster their learning and understanding of the GSN.

Many Priorities and Partnerships Funding (PPF) announcements are directly related to current initiatives that benefit students, parents and stakeholders. To access the PPF funding, a very prescriptive Transfer Payment Agreement (TPA) must be signed by the Director of Education, or designate, and submitted to the Ministry. Given this approval by senior leadership that all requirements will be fulfilled, there is a level of accountability placed on the boards to follow through. A comprehensive report back process is not likely necessary in all cases, especially when the allocated funding is not material, which can be defined based on size of board. The Ministry could look to implement a reporting process that requires only a sample number of boards to submit full reports in any given year.

## 2. Special Education – Special Incidence Portion (SIP) and Special Equipment Amount (SEA)

- **What reforms can be made to SIP and SEA to:**
  - **Reduce administrative burden and streamline processes?**
  - **Recognize the complexity of student needs across the different special education delivery models (example: self-contained classroom setting versus fully integrated settings)?**
  - **Ensure the allocations are meeting their intended purpose?**
  - **Support flexibility to meet local priorities?**

For Special Incidence Portion (SIP) claims, a great deal of effort and time is required on the part of schools and staff support to complete the required documentation. New claims require extensive information, however, for claim renewals the process should be limited to adding only changed information or new updates. Consideration could also be given to moving safety claims to a three-year cycle.

School boards are experiencing cyber threats and attacks for information at alarming rates. To ensure the protection of the information in these claims, it would be ideal to have a secure site for uploading files rather than sending by email.

As new staff members are continually joining school boards, it would be helpful for the Ministry to create webinars for SIP leads to review the forms and the processes each year. Streamlining the amount of information required for the Special Equipment Amount (SEA) would assist in standardizing the reporting process and create efficiencies. An adjustment to the submission deadline to move it earlier in the year or into the fall would assist in staff availability to address questions/concerns that may arise during Ministry review. The staff that work on the submissions are 10-month employees and are not available during the summer months.

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.

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 does not cover all the

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.

The largest component of the special education grant 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.

### **Additional Feedback:**

#### **Benchmarks and Inflation**

The Board Administration and Governance Grant has not kept up with average salaries for highly skilled workforce positions. Average salaries for certified professionals in finance, human resources, employee relations, planning, technology and communications exceed the benchmark funding determined by the Ministry. 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. Funding of full-time equivalent staffing has also not kept pace with increasing complexity and volume of accountability, transparency, and reporting requirements. A review of the benchmarks would benefit all school boards, given the enveloping requirement not to overspend the grant.

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, so Boards are left to absorb the higher pricing for key systems. Inflationary pressures also apply to maintenance, construction and health and safety requirements which are also lagging in corresponding funding adjustments.

#### **Legal Costs**

The Uniform Code of Accounts requires all legal expenses to be mapped to Board Administration and Governance despite no identifiable source of funding within the grant model. As a large urban school board within the Greater Toronto Area (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.

#### **Equity, Diversity and Inclusivity**

Providing funds to broaden the capacity of administration and teaching personnel in the area of equity and inclusivity would help address the needs that are coming forward from communities and advocacy seeking groups. Enhanced funding would target equity strategies to monitor the impact of DPCDSB priorities on equity seeking groups.

Through the Multi-Year Strategic Plan, 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 the GSN.

**Long Term Disability**

For DPCDSB, the fully-funded Long-Term Disability (LTD) plan has completely immobilized 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 is working under a Financial Recovery Plan with the Ministry of Education, however the path forward may involve significant cuts to staff and resources that will have devastating impacts.

**Summary**

Thank you for the opportunity to submit feedback on education funding for the 2024-2025 school year.

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

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