

Sent via e-mail: Liz.Sandals@ontario.ca

December 18, 2014

The Honourable Liz Sandals
Minister of Education
900 Bay Street
Mowat Block - 22nd Floor
Toronto, ON M7A 1L2

RE: Proposed Changes to the Pupil Accommodation Review Guidelines

Dear Minister Sandals:

On behalf of the Association of Municipalities of Ontario (AMO), I appreciate the opportunity to provide feedback on the proposed changes to the Pupil Accommodation Review Guidelines (PARG).

As you are aware, this is a topic of great interest to our members. Many municipalities have expressed concern about the impact of school closings. They are having social and economic impacts that are affecting community and neighbourhood well-being. When a school is shut down, the entire way of life in the local area is impacted. This includes spin off economic impacts. School closures go beyond impacting educational services making it very difficult to keep and attract new families to a community or neighbourhood when a school is lost. It is fair to say that the viability of our communities and neighbourhoods is directly related to local access to elementary and secondary education.

This is particularly true in “one-school communities” in small urban, rural, and northern Ontario where the event of a school closure can be devastating to the socio-economic well-being of the area. It also rings true in large urban areas where neighbourhood vitality may be compromised when a school is no longer present to anchor the local area. There are unique geographic conditions which need to be accounted for in different situations. Nowhere do the proposed guidelines recognize this or mandate this as a consideration in the Accommodation Review Committee (ARC) process.

Our members feel that the decisions to close schools have not adequately accounted for the value of the schools, the role that they play in a community's fabric, and how they strengthen communities. This brings us to our primary concern with the proposed changes to the PARG. We are concerned about the shift in emphasis to student achievement to the exclusion of other value considerations to the community and local economy. All the value considerations are valid and should be considered in a holistic manner. The proposed revisions to the PARG will only deepen the potential disconnect between school board decisions and local municipal planning priorities, and by extension the objectives of the Provincial Policy Statement (PPS)

which is intended to create strong communities and strong local economies. The decisions made by school boards to close or open schools should be consistent with the objectives of the PPS.

Our specific feedback is as follows:

1. Role of the Committee

One of the proposed changes is to redefine the role of the committee to one of only commenting and presenting options rather than providing a concrete recommendation. The appropriate role for the committee is to weigh all sides and come up with a recommendation that is in the community's and students' interest. Without a recommendation, the Trustees will not know the community's opinion about a potential school closing.

2. Committee Membership

The committee should have broad representation from the community including parents/guardians but also local businesses and municipalities (see comments below re: Municipal Involvement). The school board administration should more appropriately play a role to provide advice and information to the ARC, rather than sit on the committee as a member(s).

3. Municipal Involvement

Of primary interest to AMO is how the municipal role is defined in the process. The changes represent a positive development. We agree with the proposed changes, but would go one step further and mandate that school boards invite interested municipalities to sit on an ARC as a committee member. Municipal governments represent the community's interest on a broad range of matters which is relevant to the process and therefore appropriate that their representatives sit as members on the ARCs.

Schools are community assets acquired through public funding and municipalities are well positioned to contribute perspective on their overall value to the community.

We do, of course, realize that there may be multiple municipalities in a school board area and so we would propose that at least one municipality be represented on the ARC if not all can be accommodated. There is an advantage in that municipalities can bring administrative resources to bear to the process. Their expertise and resources should be leveraged by school boards for the review process. In particular, municipalities can share their planning expertise and help the school board to project future student demand over a longer-term horizon.

4. Timelines

The revisions would limit public engagement by shortening the timelines and reducing the number of required public meetings. We do not agree that it is in the public interest to limit public engagement in this manner. The current timeframe of seven months and four public meetings still seems reasonable in our estimation.

5. Optional Shortened Process

We also question the need to have an optional shortened process that might not even involve a committee. The stakes are so high with these types of decisions that a due, public process is required.

6. Reports and School Information Profiles (SIPs)

We cannot agree with the shift in emphasis to primarily consider student achievement at the expense of other factors including value to the community and local economy. School closings only bring short-term savings but there are longer term costs to human, social, and community capital which need to be accounted for. If school boards lack the technical expertise to assess these factors, then municipalities are well positioned to do so in their place. In some cases it may also be appropriate for a school board to contract an independent third party to provide these assessments.

The proposed changes that would reduce the Student Information Profile (SIP) to a mere orientation document will do a disservice to the community and present a less than complete picture of the impacts of a school closing. Not weighing all of the previous considerations about the value of the school does not address the concerns that municipalities have been raising about the current process. Further, municipalities should be able to share their community planning objectives for the area and indicate how the school plays a role as a public service facility in meeting those objectives.

7. Other

Right to Appeal

There should be a right for the community to appeal the decision to close a school to an independent third party. Currently, the only grounds to appeal are that the school board did not follow their own guidelines. The right to appeal should go much further and allow the community to appeal the trustees' decision. The appeal body should weigh the position of the school board and balance it against the priorities set by local planning decisions.

Consolidation with Other School Boards

It is worth developing an expectation under Step 1 of the Pupil Accommodation Review (PAR) that school boards consider co-location options with other school boards as a means to keep schools open in communities.

Community Hubs

We understand and acknowledge the fiscal situation that the Province and school boards find themselves in to continue to subsidize underutilized space. Locally, municipalities and school boards are finding new ways to work together to address the viability of local schools in light of these challenges. An avenue worth exploring are approaches that grow schools into community hubs by consolidation of school assets such as the integration of local programs and services, such as libraries and community centres within existing school infrastructure, where it may be practical and cost efficient for municipal governments. The community hub model is a potential opportunity that could work in some parts of Ontario. It would provide a means for school boards to bring in additional operating revenue to offset the losses incurred due to underutilized space while at the same time offering a broader range of services to the community. We would therefore encourage the Minister to accelerate the development of a Community Hubs policy and mandate that school boards more actively and strongly consider community partnerships that will help keep schools viable again at Step 1 of the PAR process. This may also require changes to the *Safe Schools Act* and applicable privacy legislation to permit co-location of services in school settings.

We hope that the Minister will give our feedback due consideration. We fear that the new process will only serve to facilitate more school closings. In our minds, it is an unproven assumption that consolidation improves student achievement. It also seems to us that the new process will only factor in the student performance that is achieved during the course of a school day. A broader notion of student achievement is warranted. There is a detrimental impact from the excessive travel times that students need to endure when going to a school outside their community, not to mention the cost of the busing. It may also limit their extracurricular activities at the school if they need to travel home by bus immediately after school. These activities are crucial to a child's development and academic performance.

Lastly, we would request that the Ministry conduct research to assess the real cost savings of closing schools to determine if the closings only bring short-term savings but entail longer term costs to human, social, and community capital.

We look forward to continuing to work together to ensure that Ontario's communities and children can benefit from improved access to learning opportunities. Given the significance of the proposed changes to the PARG, we would suggest providing more time for municipal input on this matter through a public consultation process.

Yours sincerely,



Gary McNamara
AMO President

cc: The Honourable Ted McMeekin, Minister of Municipal Affairs and Housing
Gabriel Sekaly, Assistant Deputy Minister, Ministry of Education