

TORONTO DISTRICT SCHOOL BOARD

2017-2018 EDUCATION FUNDING ENGAGEMENT GUIDE: FEEDBACK

TO Finance, Budget and Enrolment Committee 25 January 2017

RECOMMENDATION **IT IS RECOMMENDED that the report be received.**

STRATEGIC DIRECTION

- Make every school an effective school;
- Build leadership within a culture of adaptability, openness and resilience; and
- Form strong and effective relationships and partnerships.

RATIONALE Attached, as Appendix A, is the Toronto District School Board's feedback to the Ministry of Education on the 2017-18 Education Funding Engagement Guide. The 2017-18 Education Funding Engagement Guide outlines nine key areas the Ministry is looking to get specific feedback, these are:

- Renewed Mathematics Strategy;
- Highly Skilled Workforce;
- Enabling Digital Education;
- Special Education Grant;
- Indigenous Education;
- Children and Youth Care;
- Next Steps in Community Hubs;
- School Board Administration and Governance Compliance; and
- Further Transformation of Other Transfer Payments.

The Ministry will also take feedback on any other areas of concerns regarding funding for 2017-18. It should be noted that the Ministry is not looking to increase funding but work within current funding envelopes.

It is hoped that these comments can assist in the development of the 2017-18 GSNs.

RESOURCES N/A

IMPLEMENTATION AND REVIEW N/A

APPENDIX Appendix A: Draft Response: 2017-18 Education Funding
Engagement Guide: Feedback

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ROUTING Finance, Budget and Enrolment Committee 25 January 2017
Board 8 February 2017

Toronto District School Board 2017 Ontario Budget Submission

The Toronto District School Board (TDSB) is Canada's largest and most diverse school board. Every day, we welcome more than 246,000 students to 584 schools across the city of Toronto. We also serve approximately 160,000 life-long learners in our Adult and Continuing Education programs.

As the largest and most diverse school board in the country, we have a unique set of needs when it comes to what is required to best support our students and communities. Three of these unique needs that we would like to focus on in this submission are:

1. Community Hubs;
2. Transportation; and
3. Education Development Charges.

Community Hubs

The TDSB fully supports the province's commitment to community hubs to create vibrant centres of community life and strengthen our public school system.

The TDSB has a long history of developing strong and positive relationships with many community-based agencies and is a proven leader in operating community hubs in many of our schools. For example, in the 1970s, the TDSB made space available in schools for child care and parenting centres. In addition, many TDSB schools were built over 60 years ago with pools and community spaces under agreement with the City of Toronto. Our long history of community-based partnerships has benefitted the citizens of Toronto for generations. Historically, these partnerships flourished under a funding structure that enabled school boards and municipalities to address community benefits directly from a common tax base.

More recent examples of partnerships can be seen in the TDSB's Model Schools for Inner Cities paediatric health initiative. As a result of this initiative, the TDSB has made healthcare more accessible for children and youth by partnering with local hospitals and healthcare agencies to open clinics in schools. As of this year, there are paediatric clinics located in eight TDSB schools across the city.

While we greatly appreciate the province's commitment to further strengthening and growing community hubs, we are also seeking much-needed clarification in terms of the funding sources required to make this community hub vision a reality.

Changes to provincial funding for schools boards and municipal funding must occur to support providing community services and activities in schools. This has become especially evident in recent days with the release of the City of Toronto's recommended 2017 operating budget. As part of the budget, the City is proposing eliminating the Childcare Occupancy Grant. In addition,

the budget also includes the proposed elimination of funding to support three pools located in TDSB schools. This is in addition to last year's city funding reduction for three other TDSB pools.

Cuts to funding for childcare and community pools will have a direct and negative affect on the lives of thousands of families across the city.

In our view, these proposed cuts to the City's budget contradict the provincial vision of community hubs in schools and challenge the TDSB's ability to provide space in our schools. The cuts clearly demonstrate the need for all levels of government – provincial, municipal and school boards – to work together on a clear community hubs policy that outlines appropriate funding sources to help school boards make these services more accessible for all.

Transportation

Transportation service in many urban school boards is an increasing challenge. In the City of Toronto, the service challenges are compounded by traffic congestion, road construction and safety.

The driver shortage issue experienced in September 2016 continued to plague GTA boards throughout the first quarter of the school year. Parents have high service expectations and the demand for service is outstripping the supply of available drivers. School boards that try to amend their current service levels model face incredible push back from parents who rely on the service.

In the absence of provincial funding benchmarks for transportation, school boards have no guidance to support a change in service expectations and the inequity among coterminous boards is left unaddressed because boards will continue to use transportation as a means to compete for students. In addition, the TDSB is advocating that transportation for special needs students be identified and funded separately.

Educational Development Charges

Recently, the province has provided multiple years of significant funding for school repairs. We are grateful to the province for this funding which has allowed us to move beyond just fixing emergency issues in our schools and begin chipping away at the large repair backlog.

The TDSB faces a staggering \$3.4 billion repairs backlog as a result of years of inadequate funding. Without consistent funding in the years ahead, the TDSB's school repairs backlog could grow to an estimated \$4.7 billion by 2018. It is imperative that the province commit to providing predictable and sustainable funding for school repairs so that the TDSB can continue implementing our long-term plan for renewal, lower our current \$3.4 billion repair backlog and modernize our schools.

The TDSB is advocating for access to Education Development Charges (EDCs) as a source of revenue to sustain our ability to make adequate investments in our schools as development continues in the city.

As you know, school boards must meet several conditions before being eligible to require developers to pay EDCs. The first condition is that the board must show that the number of students that it needs to accommodate is larger than the space available. The TDSB does not meet this condition because there is space across the system. However, city intensification plans mean that many neighbourhoods are growing and putting additional pressure on schools in these areas that are already full.

In addition, current legislation mandates that EDCs can only be used for the purchase of land to support schools in growth areas, not to support the cost of building new schools or renovating existing schools.

Toronto City planning figures indicate that 275,000 residential units are in the building process, which could generate EDC revenue of approximately \$300 million in funding for school improvements. Toronto is one of Canada's fastest growing cities. Overlooking the use of EDCs to fund badly needed school repairs is a lost opportunity. We once again ask the Ontario government to amend the EDC regulations to ensure that the TDSB can capture this revenue and use it to build and repair schools.

Responses to Ministry of Education 2017-18 Education Funding Engagement Guide

The following section responds to the Ministry of Education questions asked in the 2017-2018 Education Funding Engagement Guide.

Renewed Mathematics Strategy

1. Now that the RMS has launched, are there any aspects of the strategy that require additional clarification or support to meet the objective of improved student achievement in mathematics?

We require clarification on the percentage, if any, of the money provided to schools that can be used for resources. In previous Student Success School Support Initiative work, the percentage was 10%. We also require clarification of the roles and responsibilities of the elementary Math Lead Teacher, as well as more information on how the role can be incentivised due to the added responsibility.

2. What challenges and opportunities do you anticipate in providing professional learning for educators in mathematics this year?

Schools face competing priorities in terms of the initiatives available to them to improve student learning. At the elementary level, there is a lack of confidence and knowledge in terms of what is required to teach mathematics.

With only five professional learning opportunities, there is a challenge when it comes to providing appropriate professional learning to a large number of teachers who are all at

different places on the math continuum in a way that is more job embedded and not an "event".

In addition, Professional Learning for Administrators needs to be considered and possibly coordinated, through the Ministry, with administrators from other boards.

- 3 a. How will the accountability requirements for the RMS inform the evolution of the strategy as it is implemented locally in school boards? Are they adequate?

Secondary accountability requirements are more valuable because they are more precise than the elementary requirements.

4. The RMS allows school boards some flexibility in configuring the required supports to meet the needs of their local context. What types of evidence and best practices are being used to shape the strategy, to make the most of this flexibility?

We examined a number of Grade 9 Applied classes and success rates in determining funding. There are some questions about the effectiveness of funding schools in the "all" category so minimally.

There is an abundance of funding at the secondary level (RMS and Student Success Funding) with minimal research on raising achievement and well-being across the whole school. Greater funding for early years is required to minimize the gaps that occur between K-3.

If the secondary RMS schools are to have robust PLTs (with a minimum of four educators, support staff and the Principal) then all schools need a minimum funding level to allow for time to meet and adequately review data and go through the planning cycle.

We are looking to survey Math Lead teachers to build a needs assessment and tailor the professional learning to be more purposeful.

5. How can supports provided outside of direct EPO funding (e.g., summer opportunities for students, educators and principals) strengthen a board's overall mathematics improvement goals (as outlined in your Board Improvement Plan) and as a result lead to greater student success.

We need to think differently about how we build teacher capacity in the summer months. How might the province incentivize summer learning to avoid days away from students and a disruption of classroom learning?

During the school year, funds should be made available to provide lunch or snacks, or other incentives, for school meetings after school hours to minimize taking teachers out during the school day.

If the secondary RMS schools are to have robust PLTs (with a minimum of four educators, support staff and the Principal) then all schools need a minimum funding level to allow for time to meet and adequately review data and go through the planning cycle.

6. Could the RMS be more effectively and/or efficiently allocated?

The funding for "all" elementary schools was not sufficient. It should be redirected to provide for additional teachers in large schools that have a math specialist and have also worked effectively with students to bridge gaps. The Ministry should consider funding secondary schools by grouping them with their elementary pathway schools to support students moving from Grade 8 into their Grade 9 program.

Highly Skilled Workforce

1. One of the Panel's recommendations focuses on an expansion of SHSM programs from the current footprint of approximately 14% of all grade 11 and grade 12 students to 25% (Recommendation 3.1). How can we allocate funding more efficiently and effectively to work towards this target of increased student participation by the 2019-20 school year? What are the non-financial barriers to and opportunities for growth? How might school boards be encouraged to continue to work with partners in your communities to promote and deliver experiential learning opportunities?

We propose the following:

- *Increase staffing, specifically for the coordination of the SHSM, which would help to build capacity and encourage sector growth in every school;*
- *Provide co-op employers/industry partners with an incentive to offer industry-related certification and cooperative education/OYAP opportunities;*
- *Offer summer co-op through Continuing Education;*
- *Establish industry advisory panels to support and strengthen the partnerships and build on co-op/OYAP placements;*
- *Increase funding for equipment needs in major credit courses to duplicate a learning environment that represents industry standards;*
- *Provide greater flexibility with pathway planning and more diversity in options (e.g. reduce compulsory co-op to 1 credit and add 1 community connected experiential learning project); and,*
- *Provide greater clarity with respect to SCWI and SHSM goals by ensuring that students in a SHSM are considered a "priority group" through the RFPs.*
- *Funds available to provide lunch or snacks, or other incentives, for school meetings after school, to minimize taking teacher out during the school day.*

2. How might schools be encouraged to apply for community-connected experiential learning project funding to support deeper understanding and wider implementation (i.e., scaling up) of experiential learning?

We recommend the following:

- *Strengthen overall curriculum expectations between literacy and numeracy and experiential learning;*
- *Provide professional learning, specifically for teachers to co-design community connected experiential learning projects with students and partners;*
- *Provide incentives to timetable literacy/numeracy/technology education and co-op side-by-side in order to have greater alignment within the compulsory credits and community partnership supports/involvement;*
- *Avoid standalone proposals which tend to be one-offs;*
- *Recognize compulsory co-op experience as a component of OSSD; and,*
- *Provide opportunities for career/life planning community connected experiences for students in the senior English, math and other required credits to contextualize sector-specific learning (in place of CLAs).*

3. What opportunities are there within existing funding to support Recommendation 3.2 of the Panel, namely, “Ontario should commit to ensure that every student has at least one experiential learning opportunity by the end of secondary school (in addition to the existing volunteer requirements)”? For example, are there opportunities within the RMS or the Technology Learning Fund (TLF) to build teacher capacity to understand experiential learning and apply the experiential learning cycle?

We recommend the following:

- *Implement dedicated co-op courses to facilitate experiential learning;*
- *Set curriculum expectations in every MOE secondary course which requires demonstration of learning/experiential learning through a transdisciplinary lens;*
- *Allow students to choose volunteer hours OR a documented community connected experiential learning project towards the OSSD;*
- *Create opportunities for career/life planning community connected experiences for students in the Grade 9 and 10 courses (i.e. Careers and Civics courses) to support a student’s IPP and plans for post-secondary education; and,*
- *Permit co-op credit(s) to be included amongst the compulsory credits for graduating with the OSSD.*

4. Ensuring that adults have greater access to flexible program delivery options is a key goal of the Adult Education Strategy. How should the Continuing Education and Other Programs Grant (or portions of this grant) be streamlined to more effectively and/or efficiently allocated resources to work towards this goal of flexible delivery models e.g. hybrid learning,

We believe that funding should be provided for:

- *Release time for Continuing Education teachers to be able to write hybrid lessons;*
 - *Professional development on how adults learn best, discuss or investigate emerging delivery models, and learn technologies to be able to enable hybrid learning;*
 - *Paid co-op opportunities to reengage adults who have to work and take care of families, allowing them to earn credits and work at the same time;*
 - *Assessment/guidance to support adults in needs assessment, goal identification, and strategy planning to achieve the goals; and,*
 - *Opportunities for staff to check in with students along the way and to provide support by understanding and helping students to mitigate barriers.*
5. In order to incent boards to explore more innovative ways to reengage adult learners and assist them in achieving their goals, what relevant performance measures could be considered to better support accountability for adult learner success?

Funding should be attached to the formal collection and submission of any additional data related to:

- *Credit accumulation;*
- *Graduation rates;*
- *Attrition rates;*
- *Attendance; and*
- *Analysis of what courses and pathways adults are taking.*

Collecting students' education prior to starting programs and what programs are subsequently recommended can be challenging at times, particularly when students come from other countries.

Enabling Digital Education

1. What are your system's learning needs when it comes to technology enabled learning?

TDSB's learning needs around technology enabled learning include the following:

Professional Learning for Teachers AND Administrators

- Increase teacher knowledge of and ability to use online learning tools such as Google Apps for Education, Desire to Learn and online resources (e.g. resources provided through OSAPAC) to support technology enabled learning goals;
- Support for teachers to learn about and collaboratively create deep learning through technology activities and lessons for students, and provide opportunities for teachers to reflect on and discuss the implementation of deep learning in their classrooms and share success and challenges;
- Expand knowledge of and experience with creating and connecting Growing Success to technology enabled learning and online learning environments; and,
- Ensure that administrators have a fundamental understanding of and ability to function in a variety of online learning tools such as Google Apps for Education in order to model leadership and actively participate in school based professional learning teams.

Student Devices

- Schools continue to express frustration with not being able to provide an adequate quantity of devices during the school day to support technology enabled learning.
2. What mechanisms are in place to ensure that broadband is used to support student achievement, ensure equity, promote well-being, and enhance public confidence in ways that are not otherwise possible? Are these mechanisms scalable?

Network and internet access are used to support a wide variety of digital learning environments and tools, including Google Apps for Education, Google Classroom, Desire to Learn and a variety of OSAPAC resources. These environments and resources all support student achievement. Access beyond the school day can also support equity and well-being priorities. Having extended access to the learning environment and digital tools enables students to access content, material and instructions when they have been absent or wish to review information. Online environments and material also provide structure and organization that students may lack in traditional paper-based classrooms.

3. If TLF funding was continued, how could we allocate the portion of funding for technology and digital learning tools more effectively and/or efficiently?

TLF Funding is critical to the technology enabled learning journey. Funding could be allocated more effectively if school boards were required to:

- Attach goals and targets to the allocation of funds. For example, increase teacher awareness of and ability to use online learning environments with a

goal of three teachers per school by the end of the school year. Requiring targets forces school boards to be specific and focus on what data sources will indicate successful completion of goals.

- *Require school boards to dedicate a significant portion of TLF funding to teacher AND administrator professional learning.*
- *Require school boards to dedicate a significant portion of professional learning funds focussed on a multi-day, team model instead of "one off" days with no follow-up and no measurement of impact. A multi-day model focussing on school teams builds capacity and allows for classroom-based learning and action between professional learning sessions.*

4. Is there a role for a collaborative governance structure of digital education assets (e.g., consortia)?

A collaborative governance structure could be useful in coordinating and connecting activities amongst school boards around the use of digital learning tools, such as learning environments, resources, etc. It would be beneficial if this body could work towards the provision of digital learning resources tied to curriculum, which would fulfill a significant need in our board and across the province.

5. Ministry analysis has shown that computer expenditures (operating and capital) can vary significantly from year to year. What are some of the reasons for this volatility?

All technology assets are depreciable and have a finite life. If a school or district addresses a need in one year, it may be satisfied for the subsequent two or three years but then re-surface. Examples of this include student devices and wireless routers.

Special Education Grant

1. What accountability measures should the ministry consider using to assess outcomes for students with special education needs beyond EQAO assessments?

We believe that the following accountability measures should be used to assess outcomes for students with special education needs:

- *Report card data;*
- *Suspension data;*
- *IEP/IPRC – ONSIS data;*
- *Attendance data; and,*
- *Student and parent voice.*

2. What internal processes does your board use to ensure it evaluates and allocates its resources in the best possible way to support students with special education needs?

At the TDSB, we review the data listed above on a regular basis. We review factors that affect allocation of resources, such as LOI, student population, population of students with special education needs and level of support they are receiving (regular class/special education class). We also conduct an annual review of standards and targets for support staff allocation for special education classes.

3. What other GSN allocations are boards using to complement their Special Education Grant? Should the ministry consider changes to financial reporting to reflect this spending from other areas?

The Board relies on flexibility in the grants to provide the range of services and supports to vulnerable students. The issue is not about changing financial reporting but rather adequately supporting the needs of special education students.

4. In the updating of special education resources, what clarification would be recommended in the development and implementation of IEPs?

We believe that an updated IEP guide (including additional print versions) from the Ministry would be helpful as the last update was in 2004. Increasing the number of sample IEPs available through eduGAINS would also be helpful.

5. How might we maximize the impact of the IEP and increase educator's ability to support students directly?

We believe that there should be a greater focus on delivery of program, as opposed to record keeping, to maximize the impact of the IEP and increase educators' ability to support students directly.

6. Presently SIP measures greater special education needs in terms of staff support received by the student. How can we improve SIP for funding students with greater special education needs?

The amount of SIP funding should be increased to better cover the actual salary of employees. Currently, school boards are responsible for paying 75 percent of the salary cost.

- a) How could we better define students with greater special education needs?

Frequency, intensity and duration of behaviour or physical/medical needs should be used to better define students with greater special education needs.

- b) How could we better report students with greater special education needs?

We believe that a standardized alternative curriculum could be used to better report students with greater special education needs.

Indigenous Education

1. Have boards been successful in implementing a dedicated lead position?

The TDSB has had a dedicated lead position for several years. The TDSB's Aboriginal Education Centre was established in 2006. At this time, an embedded Central Coordinating Principal position was created. The Central Coordinating Principal subsequently leads an expanding team.

2. Do the current four allocations within the Supplement efficiently and effectively address the needs of Indigenous learners?

Yes. The allocations have addressed the use of data to support student achievement, supporting students, supporting educators, and engagement with awareness building.

3. Is the balance of accountability appropriate with respect to the components of the Supplement?

Yes. The balance of accountability has been appropriate.

4. Should the ministry continue to increase the use of self-identification data in its funding models?

The requirement of self-identification should not be aligned with funding. It would be more appropriate to use the data related to census information and research related to population indicators for this purpose.

To require families to register through self-identification furthers a mistrust of institutions based on the legacy of history and the trauma perpetrated upon First Nations, Métis and Inuit peoples. In an urban construct, it is extremely difficult to gather the data as people from rural and reserve areas migrate to and from cities, thus underscoring that census information is more reflective and accurate. The funding model should be increased to include all students (Indigenous and Non-Indigenous) in creating

safe spaces for Indigenous students and families as articulated in the Truth and Reconciliation Commissions - Calls to Action and the recent Daniels case (status and non-status and Métis).

5. Are there provisions in the Calculation of Fees for Pupils regulation that you would like the ministry to review or amend?

N/A

6. What are examples of successful Education Service Agreement negotiation approaches? What opportunities exist for improvement?

N/A

Youth in Care

1. Many CYIC are supported through additional targeted components of the GSN. Is this targeted funding enabling school boards to effectively support the needs of CYIC students?

The funding enables increased interventions to serve students in care and to facilitate equity of outcomes. A funding adjustment is required for these programs to cover such costs as supply teacher coverage and additional services to students in these programs.

2. How could this funding be more effectively and/or efficiently allocated?

The funding should be directly linked to students in care in a manner that increases accountability for planned actions and the results of these actions in terms of the achievement and well-being of students in care.

3. What would be appropriate accountability mechanisms to ensure that the often complex needs of CYIC students are met?

Multiple layers of accountability need to be in place to ensure that these funds provide direct service to students in care. For example, pre and post data from standardized diagnostic assessments to demonstrate how gaps in achievement are being closed through precise teaching and other needed wraparound services. Another layer of accountability would be surveys before and after to discern that student voice is honoured as an essential part of an effective plan.

4. How could best practices be shared across the province?

An opportunity to highlight best practices would be at the Care and Treatment (CTCC) meetings that occur provincially four times each year.

5. How might we better support the implementation of local JPSAs beyond training? Should funding be enveloped for that specific purpose?

Funding should be enveloped to safeguard collaboration in development of local joint protocols between CAS and school boards that ensure increased student achievement for students in care with accountability as an essential component.

6. How can we leverage available data to better track educational outcomes for CYIC and close achievement gaps?

Specific interventions need to be used to better track educational outcomes for CYIC and close achievement gaps. At the TDSB, for example, we are using a reading intervention FastForWord to close achievement gaps and we have specific data that is closely monitored for each student.

Next Steps in Community Hubs

1. How are the recent amendments to O. Reg. 444/98 working? Are there any further changes or support the ministry should consider making?

The requirement for fair market value on all site sales was a welcomed change to the regulation because it removed what was formerly a disincentive to site sales between school boards. Introducing a cap on lease rates that can be charged to other school boards is problematic because the Ministry's calculation does not fully recover all operating costs for the space, and true market value of the space is not realized. We recommend that lease rates should also be at the fair market value.

2. What other types of capital or other initiatives/programs should the ministry consider to encourage the development of more community hubs and community partnerships in schools?

The Ministry should ensure that the host school boards can fully recover the actual operating and capital costs for the space provided to community partners, and that the school board's utilization rates are adjusted to reflect space occupied by the community partner.

3. What types of common data or information would be useful in either locating or operating a community hub in one of its local schools?

Information that would assist organizations includes:

- *Location of school site;*
- *Available space;*
- *Available parking;*
- *Separate entrances;*
- *Operating and capital cost of site;*
- *Age of building; and,*
- *Transit availability.*

4. How can school boards, CMSMs/DSSABs and early years partners located in schools better collaborate to increase access and affordability to programs, and support the government's commitment to create 100,000 additional child care spaces?

The Ministry of Education should fund operating and capital costs of childcare spaces in schools. This would eliminate the financial administration between school boards, city and childcare operators, and would also provide for more affordable childcare for families because the funding would be coming from general Provincial revenues rather than working families with children.

5. What would be the impact to school boards of requiring that space leased to child care and early years providers be guaranteed for a minimum number of years?

The only concern for school boards is in areas of enrolment growth. As long as school boards have access to capital funding to address growth, childcare partnerships are beneficial to the school board and local families.

6. What initiatives, guidance or regulatory measures could facilitate school boards and early years partners in working together more effectively (e.g., develop common methodology for school boards to recover costs associated with child care and early years)? How can these partnerships be made more transparent?

A clear understanding of the funding responsibilities among partners and space expectations.

7. As the government transitions existing child and family programs to become Centres by 2018, how can we build on the work already done by school boards and partners to establish and operate family support programs in schools, and make greater connections to community hubs?

Ministry clarification of funding arrangements to support community hubs is necessary and critical for this initiative to be expanded in schools.

School Board Administration and Governance Compliance

1. What challenges might a board face that may make it difficult for it to comply with the enveloping provisions?

Overall, there is increased demand on central administration from the Province (BPS, RFPs, Reg. 444/98 agency expansion, other ministries reporting requirements, ARC/PARs, audit requirements, etc.), municipalities and local communities.

2. How should the ministry ensure compliance with the enveloping provisions related to the grant? Should additional restrictions be placed on the use of other revenues used to offset board administration expenses? If restrictions were to be placed how should these be designed?

We believe that additional constraints would hamper the board's ability to respond to all of the current demands and requirements.

Further Transformation of Other Transfer Payments

1. How can reporting requirements be further streamlined and reduced to find efficiencies in administration without losing reporting effectiveness?

The Ministry should review its use of board reports to ensure that the information being requested from boards is necessary and useful in policy development and check for redundancy of information.

2. Are there opportunities for EPO funding to be bundled to help reduce reporting requirements?

Yes. EPO funding should be bundled in major categories rather than individual grants.

3. Are there opportunities to move any of this funding into the GSN?

Yes. We believe that longstanding, reoccurring EPO grants should be folded into the GSN.