PIAC Working Group REPORT

Working Group	Consultations
Date	
Description/Objective	*The Consultations Working Group was formed to prioritize, summarize, and disseminate information to PIAC, and where applicable the TDSB parent community, regarding Policies and Procedures under review by the TDSB. Dissemination of information to the parent community will be coordinated with PIAC Ward Representatives and the Communications WG. Where applicable the Consultations WG, along with all PIAC members, will coordinate review and/or provide feedback and/or make recommendations to the PIAC Co-chairs regarding the review and revision or development of TDSB Policies and Procedures.*
Update	The Consultations WG has not met formally since the Oct PIAC meeting. The WG has been preparing the final "Feedback from PIAC" to the TDSB on the recommendations of the Enhancing Equity Task Force (attached). The feedback was generated from commentary and discussion between PIAC and parent members (see appendix). The Feedback was submitted to the Board by the Co-Chairs on Nov 20th, 2017.
Motion(s)	
Question(s)	*[This section is for less formal questions to pose to the PIAC group.]*
Next Steps and Action items	Follow-up with ongoing and new TDSB Consultations (Fundraising). Continue work on Consultations Tool Kit. Liaise with communications WG regarding newsletter and updates.
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PIAC Feedback on TDSB Equity Task Force Draft Report

Members of PIAC have reviewed and discussed the Enhancing Equity Task Force Draft Report, which summarized the findings of consultations with stakeholders and made recommendations to the Board. We commend the TDSB's efforts to address equity in the education system and have highlighted three areas we feel the Board should prioritize. However PIAC members have a number of concerns about the feasibility and accountability of the Recommendations as well as the quality of the report and the TDSB's approach to public consultation on this issue.

PIAC's feedback for the Board is summarized below.

1. **RECOMMENDATIONS FOR SHORT TERM ADOPTION:**

    PIAC recommends the following aspects of the Draft Report for early adoption by the Board:

    i. De-streaming of high school curriculum. PIAC feels that the recommended destreaming of high school curriculum should be a priority for the Board. De-streaming is overdue in Ontario. De-streamed programming can be expanded, based on the existing pilot studies, in TDSB schools regardless of regional differences or socioeconomic needs. The impact of access for all students to equivalent education and postsecondary opportunities can be readily measured and indeed the Board already has data to support de-streaming of early high school curriculums. Delivery and support for destreaming should be provided in a manner that ensures program success and allows all students access to equivalent post-secondary opportunities.

    ii. Providing equitable access to special programs via an equitable application process and graduated entry for highly specialized schools that stems from more comprehensive programming in each region. Many specialized programs are dependent on students having access to private lessons or training outside the education system. Equitable access should include direct assessments of individual students and reserve spaces based on aptitude and need rather than resumes. A graduated entry system would allow for students to apply from local special programs to highly specialized schools in later grades (e.g. entry at Gr 10 or 11 rather than Gr. 9).

    iii. Access to special education and specialized programs in each Ward or education region. PIAC feels that broadening access to special programs in each region, in a way that reduces or eliminates economic or transportation barriers, is an achievable approach to enhancing equity. The impact of local access on equitable education and education outcomes would also be readily measured and reported to stakeholders.

    2. **FEASIBILITY AND TIMELINES:**

    PIAC Members have expressed concern about the funding and feasibility of many of the recommendations. PIAC Members have also expressed concern about the lack of identified short and long-term goals in the Recommendations. The TDSB or the Task Force should clearly define which Recommendations could be adopted by the Board in the short term without significant additional resources, and which approaches will rely on long-term

planning or support from other levels of government. Where additional support is needed a plan should be outlined for how that support will be lobbied/promoted/achieved.

i. Many recommendations begin with "additional funding" or "Resources and supports be realigned" without specifying where additional funding will come from or what programs will be defunded to shift resources. Will recommendations needing additional funds be abandoned if additional funding is not found? In which instances will the Board need to lobby the Ministry to Education to implement recommendations?

ii. The Task Force should identify which recommendations can be adopted/implemented now and without additional funding.

iii. There is a lack of data summaries. The Task Force should generate tabular data that highlights and presents areas of inequity in a clear manner. This tabular data should then be available in the summary section and referenced in the individual recommendation sections. Tabular data would more readily promote understanding of the equity gaps and should include the input from specialty groups, public consultations, and the TDSB's own data. Tabular data would make this document more accessible. Note: Tables should be self explanatory to the reader and not require reference back to lengthy introductory text or appendices.

iv. The Draft report refers in many cases to outside studies that are not specific to the TDSB (e.g. city demographics). Board members and Executives frequently highlight the amount of data available within the TDSB. The TDSB's own data, wherever available, should be presented/summarized in a way that highlights the areas of need with regards to special programs, neighbourhoods, marginalized groups, and socioeconomic barriers, within schools as well as across school districts. The matrix in Appendix I is difficult to interpret and is not equivalent to presenting data by district, program, or demographics.

3. ACCOUNTABILITY AND LACK OF PERFORMANCE MEASUREMENTS

PIAC members have expressed concern regarding the qualitative nature of many of the Recommendations and a lack of measurable outcomes that can be monitored and reported to stakeholders.

i. Recommendations are very qualitative rather than giving examples of how increasing equity might be carried out or defining what resources would be needed.

ii. Recommendations for parent/family engagement are vague. The recommendations have few real actionable items or require significant resources (i.e. social workers) or describe programs and organizations that already exist (such as Community Advisory Committees). Recommendations for increasing parent engagement should highlight the programs that already exist and clearly define how the Board will increase access to or promote knowledge and use of these programs.

iii. The Task Force Recommendations do not address or discuss specific requests from stakeholders e.g. Hiring Ombudsperson(s). Student Groups specifically

asked for the establishment of Ombudsperson(s). *("That the TDSB hires 4 student ombudspersons, one for each learning centre, attached to the human rights department).* A specific request from key stakeholders (the students themselves) should be addressed by the Task Force and the Board.

iv.   Measurement: The Integrated Equity Framework has no quantifiable outcomes attached to it. It is made up of statements. How can statements be measured objectively? If outcomes cannot be measured objectively, how can changes in equitable education be evaluated? How will "success in enhancing equity" be reported without measurable outcomes?

v.   Assessment and Reporting: There's no mechanism recommended to assess the impact of new equity approaches or mechanisms for reporting to stakeholders in the education system. There should be a clear and transparent manner in which progress will be reported and accountability assigned to each equity component. Assessment of outcomes and reporting should be developed for both short and long-term objectives.

vi.   Who is held accountable for each part of the adoption or implementation of the recommendations? What is the accountability or follow-up model for recommendations? Along this line the TDSB needs to "own" some portion of these recommendations as items they will definitely adopt/implement rather than deferring to Provincial partnership or the need for additional funding.

4. THE OVERALL STRUCTURE OF THE REPORT

Strong concern was voiced by PIAC Members regarding the quality and structure of the draft report that was presented to the public including a lack of clarity, issues with writing and editing, missing information, lack of framing of ideas, and lack of references to appendices (or missing appendices).

i.   The quality and readability of a report released for public comment/feedback, even if it is a draft, should be worthy of public scrutiny (especially a report from an educational institution). A document that is difficult to read is less accessible, is easily misinterpreted, and detracts from the public's confidence in the report. The document should be complete (Appendices F and G are missing), limit the use of acronyms/jargon, ensure that terminology is defined (including Equity), be free from errors, and contain sufficient explanation to promote full understanding among a lay audience.

ii.   Do the Recommendations address the specific "findings" and data of the Task Force? The appendices make it appear as though all the recommendations in the report are supported by data and feedback from the public and various groups, but some of the recommendations do not seem to have any support (*example 1: recommendations regarding special education do not fit with up-to-date information from SEAC; example 2: removal of gifted programs is not supported by information in the appendices*). Where did each of the recommendations come from and what data was used to generate those recommendations? As part of the public consultations, PIAC asks that all recommendations reference supporting data or stakeholder comments/requests or the attached appendices;

this way stakeholders will know that the recommendations are not simply the views of one or two participants.

iii. It is not clear what the Board intends to do with this Summary and the Recommendations. A concise list of "next steps" should be outlined at the head of the Recommendations. When the "final draft" goes to the public, it should be made clear that these are recommendations to the Board, to be considered individually for adoption, and are not recommendations from the Board for the staff to implement. The TDSB needs to ensure parents are informed about the next steps, the overall process being used, and that this report, even in its final format, is not the final action plan.

Appendix: Individual comments from PIAC members.

1. **Overall Comments:**

    i. Things we like and want the board to act on:

        i. Destreaming high schools

        ii. Providing equitable access to special programs via an equitable application process for highly specialized schools and more comprehensive programming in each region.

    ii. Do the Recommendations address the "findings" of the Task Force?

    iii. It is not clear what the Board intends to do with this summary and recommendations.

    iv. Recommendations were very qualitative rather than giving examples of how increasing equity might be carried out or defining what resources would be needed.

    v.   Measurement: The Integrated Equity Framework has no quantifiable outcomes attached to it. It is made up of statements. How can statements be measured objectively? If outcomes cannot be measured objectively, how can Equity be evaluated?

    vi. No timelines are given for implementation or evaluation, even in terms of "short term" and "long term".

    vii. Assessment and Reporting: There's no mechanism recommended to assess the impact of new equity approaches or mechanism for reporting to stakeholders in the education system. There should be a clear and transparent manner in which progress is reported and accountability assigned to each equity component.

    viii. Who is held accountable for each part of the adoption or implementation of the recommendations? What is the accountability or follow-up model for recommendations? Along this line the TDSB needs to "own" some portion of these recommendations as items they will definitely adopt/implement rather than deferring to Provincial partnership or need for additional funding.

    ix. Many recommendations begin with "additional funding" or "Resources and supports be realigned" without specifying where additional funding will come from or what programs will be defunded to shift resources. Will those recommendations not be adopted or implemented if additional funding is not found?

    x.   The Task Force should identify which recommendations can be adopted/implemented now and without additional funding.

    xi. Ombudsperson(s)? Recommended by Student Group *("That the TDSB hires 4 student ombudspersons, one for each learning centre, attached to the human rights department).* There is no mention of Ombudspersons or needs such a role might fill in the Summary or Recommendations.

xii. Tabular data that highlights areas of inequity in a clear manner is needed in the Summary section or associated with the individual recommendation sections. Tabular data would promote understanding of the equity gaps and should include the input from specialty groups, public consultations, and the TDSB's own data. Tabular data would make this document more accessible. Tables should be self explanatory to the reader and not require reference back to lengthy introductory text.

xiii. The Draft report refers in many cases to outside studies that are not specific to the TDSB. Board members and Executives frequently highlight the amount of data available to the TDSB. This data should be presented/summarized in a way that highlights the areas of need with regards to special programs, neighbourhoods, marginalized groups, within schools as well as across school districts. The matrix in Appendix I is difficult to interpret and is not equivalent to presenting data by district, program, or demographics.

xiv. In which instances will the Board need to lobby the Ministry to Education to implement recommendations?

xv. The appendices make it seem as though all the recommendations in the report are supported by data and feedback from the public and various groups, but some of the recommendations do not seem to have any support. Where did these recommendations come from and what data was used? As part of the public consultations, we ask that all recommendations reference supporting data or stakeholder comments/requests; this way we will know the recommendations are not simply the views of one or two participants.

xvi. When the final draft goes to the public, it should be made clear that these are recommendations to the board, to be considered individually for adoption, and are not recommendations from the board for the staff to implement. The TDSB needs to ensure parents are informed about the next steps, the overall process being used, and that this report, even in its final format, is not the final action plan.

2. **Comments on Specific Recommendations:**

   A) **Ensure Equitable Educational Experiences and Opportunities for All Students in All Schools**

      a) Recommendations here are very descriptive and lofty e.g. "Establish practices that will see all students reading by Grade 1". Is this not already a goal of the Board? Why isn't this goal already being achieved? How will teaching methods or curriculum be altered to achieve this goal? What additional resources might be needed?

      b) Increasing equity by redistributing specialized programs to all schools or families of schools is welcomed although concern was raised regarding the cost of expanding specialized programs or feasibility in some areas based on student numbers.

      c) The prospect of "eliminating optional attendance" is alarming to parents. The Board currently has an Optional Attendance Policy and Procedure,

which covers regular programs (elementary and secondary), specialized schools and programs, alternative schools, and French programs. The authors should not be using the blanket term "Optional Attendance" unless they mean all of these sections, otherwise they should state which specific sections they are referring to.

i) *"Eliminating optional attendance is a punative action towards students that have shown themselves to be gifted in a subject but not in the proper place in order to benefit ie the lack of upward mobility"*

d) If the intent is to add specialized programs, increase access to them, or simply move them to other schools, then the authors need to use language that reflects one or all of these options, and does not lead parents to believe that programs are going to be cut.

e) The Special Program application process is not mentioned in the recommendations. Some programs favor students who have benefitted from private/paid instruction outside the school system. Equitable access to special programs needs to be addressed at the application stage, not just by offering watered down programming in all regions.

f) The recommendations regarding special education do not include up-to-date information from SEAC. SEAC rescinded one of their recommendations (currently in the appendix) at a recent board meeting (June 8, 2017; Board Services Agenda Record PSSC:063A Agenda Item 4(vi); Section 2 "*Recall of Recommendation 7 from SEAC Motion #5, for Further Study*") and information from minutes from their spring meetings are not included (this speaks to the recommendations for full inclusion and phasing out of all special education schools).

g) The recommendation from the task force to remove gifted programs does not seem to be supported by the information provided in the attached appendices. Consultations with gifted student's parents was not done to hear their views on the matter and there is no data included on the results of the new testing procedure for the gifted program (which was created to enhance equity).

h) "The problem with all the equitable access is dependant on the standards. One can "roll out " specialized programs ad nauseum with a bland approach to all, but the minimum standards for each program must be determined (who will decide this, TDSB?). If the TDSB cannot deliver world class standards with a given specialized program then it is really a delusional effort."

B) **Ensure Equitable Access to Funding and Resources among Schools**

a) In the absence of additional funding from the Province increasing funding in one school/region/program will require reduced funding elsewhere in the system? How will redistribution be achieved?

b)

C) Engage Students, Parents/Caregivers and the Community in Building a Culture of Equity in School

a) "Group to be formed around fundraising practices"? That description sounds like PIAC. Has the Task Force looked at maximizing existing resources rather than creating additional groups?

b) Community engagement and parent engagement recommendations include many frameworks that are already in place but not necessarily happening, how will the Board ensure engagement over the current system? (i.e. eliminating paid permits, increasing access to schools after hours).

c) Successful implementation of many other family engagement recommendations will require additional funding for support workers or similar resources. Since most schools have some level of need "reassigning resources" will not be sufficient to address this area equitably.

d) The parent engagement sections do not include information gathered via the Task Force's Family Engagement sub-committee meetings. These sections are much too vague compared to other sections in the report and have no real actionable items (such as professional development).

e) The Parent Engagement recommendation section refers to using the Inner-City Model. This is a model that relies on extra funding and resources. If there are no extra funds or resources available, this recommendation will be useless. We need better, more doable recommendations.

D) Address School Safety, Incidents and Complaints through an Equity Lens

a) High school students requested Ombudspersons (one per learning centre) under the Human Rights department. There is no mention of ombudspersons in the summary or recommendations.

E) Ensure Equity in Staff Employment, Transfer and Promotion

a) How does moving Principals every 5 years ensure or enhance equity? What discussion or feedback does this refer to? Simply setting a time limit for Principal placement does not ensure or enhance equity. Principal transfers are generally disruptive to both students and families. Where a Principal is doing good work transfer would have a negative impact on the school community. Poorly performing Principals should be addressed by

performance improvement plans and training rather than simply shifting the problem elsewhere.

F) Provide Equity Training for ALL

a) "Equity training for all" – this statement is too broad. The Board needs to consider the differential needs of students vs parents vs staff vs administration at the local school level.

3. **Comments regarding a document presented for public view:**

   i. The quality and readability of a report released for public comment/feedback, even if it is a draft, should be worthy of public scrutiny. It should be complete, limit the use of acronyms/jargon, free from errors, and contain sufficient explanation to promote full understanding among a lay audience. A document that is difficult to read is less accessible and easily misinterpreted. ("*Poorly edited, incomplete document that is being misconstrued by parents as the final document for adoption by the Board*").

   ii. In future the Board should have parent representatives or groups look at the draft, to check for clarity, before it is published online.

   iii. Terms used in the report must be defined and should match the definitions used in current board policies and procedures.

   iv. Frequent spelling and grammatical errors.

   v. Sections of the full length document are missing. Appendices F and G contain only "insert PDF" markers. All reference sections are needed so that stakeholders can cross reference feedback, statistics, existing models, and suggestions.

   vi. Some sections appear well written while others read as bullet points collected into paragraphs.

   vii. In some areas of the Recommendations the statements are too brief and need further definition for clarity or to avoid confusion. Example: "optional attendance should be phased out" is being taken to mean that the TDSB will eliminate specialized programming or eliminate all specialized schools. "Does this mean that they are removing all options to go to a school that is outside your neighbourhood, or is it just a change to the way the process is currently done

With respect to standards (quality) to speciality programs I feel third party standards should be considered not TDSB standards,where there is a minimum based on world standards.