# Toronto District School Board Submission to the 2024-25 Education Funding Consultation

The Toronto District School Board (TDSB) is Canada's largest and most diverse school board in the country, with approximately 235,000 students at 583 schools. We also serve more than 100,000 learners in Adult and Continuing Education programs.

The TDSB has unique needs when it comes to what is required to best support students and communities. We need safe and modern learning environments, 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. To help address gaps in student achievement, and mental health and well-being needs, it is critical that the TDSB receives adequate funding support.

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.

## **TDSB's Response to Education Funding Guide Questions**

# 1. What reforms can be made to the GSN funding formula to:

# i) reduce its complexity?

Although the implementation of the Transfer Payment Ontario System (TPON) Online Platform has provided some efficiencies around the reporting process, there are still possible areas of improvement. For example, the TPON functionality should allow for notifications, workflow management and delegation. It would be ideal if the system could allow Multi-Project Transfer Payment Agreements (TPA) to be shared with different program owners for review and acknowledgement prior to final sign off by the Director of Education.

Additionally, the reporting templates should be provided to school boards at the same time as the Transfer Payment Agreements, so that staff know what information is required at the start of the funding period. This will help facilitate information gathering and expense tracking.

The Ministry may also consider aligning ad hoc Priorities and Partnerships Funding (PPF) reporting deadlines to the Board's Ministry financial reporting timeframes to streamline the financial reporting involved. For funding that is announced mid-year, school boards should be provided with sufficient time to plan and utilize the funds, or flexibility to carryover unspent funds. It has been a challenge to achieve full funding utilization (e.g. the tutoring support funding in 2021-22), especially when the funding is used for staffing or mass procurement of goods (e.g. ventilation units). Time required for recruitment and procurement should be considered when determining the funding timelines.

The Ministry could consider reducing the reporting requirements for PPFs by, for example, requesting only one consolidated year-end report instead of multiple reports with different timelines. It would be preferred if some of the recurring PPFs that the TDSB receives annually, such as the Focus on Youth funding, be transferred to the Grants for Student Needs (GSN). This will help alleviate budget uncertainties and program planning delays. It will also allow the department to hire appropriate staff to manage the program.

#### ii) enhance the transparency on how school board funding is used?

The TDSB recognizes the importance of stakeholder involvement in budget development.

During the budget process, stakeholders are consulted and also have access to all budget documents on the TDSB website. In addition, TDSB reports on its expenditures on a quarterly basis using current Ministry templates. Annually, TDSB prepares and publishes a *Financial Facts* document that outlines the current projection and previous four years of financial and statistical information.

# 2. What opportunities are there to strengthen accountability while balancing administrative requirements?

There are also significant non-financial reporting requirements for certain Priorities and Partnerships Funding (PPF), such as Human Rights and Equity Advisor, Autism Spectrum Disorders, Focus on Youth, Graduation Coach program for Black students, and French as a Second Language. The Ministry should consider reducing the reporting requirements for these PPFs 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 track and complete. The Ministry of Education should consider providing administrative costs to support these programs.

The reporting requirements between the Education Financial Information System (EFIS) and other ad hoc reporting throughout the year should be streamlined, condensed and simplified. The Ministry may also consider aligning ad hoc Priorities and Partnerships Funding (PPF) reporting deadlines to the Board's Ministry financial reporting timeframes to streamline the financial reporting involved. The functionality and capability of the Transfer Payment Ontario Online Platform should be enhanced to allow for notifications, workflow management and delegation. For example, for the Multi-Project Transfer Payment Agreements (TPA), the ability to assign or tag program owners to review and acknowledge TPA prior to final sign off by the Director of Education would improve efficiencies. 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 flexibility to defer revenue. It has been a challenge to achieve full funding utilization, especially when the funding is used to hire additional staffing, as recruitment efforts and finding the right talent can take time.

# 3. What opportunities exist to better communicate to taxpayers:

# i) how GSN funding is allocated to school boards?

TDSB recognizes the importance of providing stakeholders with access to detailed information and therefore, posts all budget materials and quarterly reports on its public website and the information is also contained in our *Financial Facts* document published annually on the website.

#### ii) how school boards use GSN funding in alignment with government priorities?

TDSB aligns its resources to both Ministry of Education priorities and local needs. To further demonstrate this alignment, in future budget documents, TDSB will include an outline of the Ministry education priorities, including identifying what funding has been provided to support these priorities and how TDSB has utilised these to support our students.

# SPECIAL EDUCATION - SPECIAL INCIDENCE PORTION (SIP) AND SPECIAL EQUIPMENT AMOUNT (SEA)

What reforms can be made to SIP and SEA to:

## i. Reduce administrative burden and streamline processes?

#### SEA

Fiscal Cycle: The Ministry's fiscal cycle is different from school boards' fiscal cycle, which results in challenges with submitted claims falling between two Ministry fiscal years. It would be much easier working with the school year timeline as all other funding does.

Assistive Devices Program (ADP): Once a child graduates, many families struggle to access technology and other equipment that was essential to their learning in a public school. A more cohesive connection between SEA and ADP funding would help support families during these transitional times, as there is often a gap between when they graduate and when they apply and receive items through ADP. It is also important that consideration be given to supporting continued learning both in school and at home.

The claims-based funding appendix requirements can be tedious with each item needing to appear for each student. A more streamlined approach such as the Appendix for the PPA would reduce administrative load on a variety of departments.

#### SIP

Large Amount of Administrative Time: In large school boards with large numbers of students with complex needs, a considerable amount of time is spent on supporting schools through the complex packages and central review and compilation of the claims instead of the support being focussed on students.

Appendix D: Special Incidence Portion (SIP) Staff Support Level Timetable: This specific SIP appendix is very time consuming and complicated for schools to complete. The actual headings are not clear and having the schools see the specific funding amount has led to a lot of confusion as to where the funding goes.

ii. Recognize the complexity of student needs across the different special education delivery models (example: self-contained classroom setting versus fully integrated setting)?

#### SEA

There needs to continue to be flexibility in the PPA to meet the needs of students to support students in a variety of ways in a variety of classroom settings. The PPA allows special education to review and utilise technology that can support students in schools in innovative ways. This cannot be made from school-based budgets as many of the innovative tools require testing and adaptations to meet the specialised needs of students with special education needs (AAC devices, eye gaze equipment, etc.).

There needs to be continued access to equipment through the claims-based SEA funding to support the complex needs of special education students in a variety of settings (e.g. wheelchairs, braillers, FM systems, etc.). School boards also need access to funding to support testing out innovative new technologies.

It is also important to recognize the complexity of students' needs and adapt eligibility criteria to consider a broader range of student needs, not just physical safety concerns.

#### SIP

Funding applications or models should respect the dignity and human rights of students and move away from the current approach that highlights individual student deficits or disabilities. Removing the need for individualised applications (look to larger system data that could include number of IEPs, safety plans, self contained classrooms, violent incident reports, etc.

to allow for appropriate staffing for each board). This would also greatly remove the administrative burden on schools.

# iii. Ensure the allocations are meeting their intended purpose?

#### **SEA**

Ministry contacts could be in touch with Board leads on a more regular basis to review and discuss funding allocations. Regular audits would ensure the Ministry could see that the allocations are being used for their intended purpose and the Ministry would be able to see local priorities and initiatives and provide feedback to the TDSB, and share best practice amongst all Boards.

#### SIP

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# iv. Support flexibility to meet local priorities?

#### **SEA**

The SEA PPA funding guidelines allow for flexibility and meeting local needs. This funding allows Special Education to look at students' unique needs and obtain technology that is very specific for students with special education needs that a school would not be able to provide/test/adapt.

The claims based amount does not allow for any flexibility for purchasing of trial equipment.

#### SIP

The SIP funding allocation amount supports flexibility in the model of support provided across the district in a variety of settings. These settings include differentiated room configurations and flexible space for student needs and the equipment to support.

It's important that students have the ability to remain in their local schools, which means ensuring that these spaces meet all accessibility needs.

## OTHER SPECIAL EDUCATION CONSIDERATIONS

Flexible spaces and funding for mental health supports is inadequate both within school boards and for community and healthcare partners. Access to mental health supports for students with special education needs is further limited by lack of available services. The education system could be well positioned to support the mental health needs of special education students, if adequate funding were provided for staff and programming.

Making school buildings accessible needs to be a priority for the Ministry to support a student's right to inclusion. Special education funding should reflect the needs of the student regardless of classroom placement. Inclusion in a regular classroom should be a choice for families that comes with the same supports as a self-contained classroom.

Funding for student supports should be stable and predictable, and have associated timelines (advanced notice, spending timelines) that allow for effective planning and implementation by school boards. While PPFs provide flexibility to respond to changing needs supports for academic success and well-being/mental health, these needs are ongoing and must be incorporated into long-term, stable GSN funding.

#### 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.

Increased staffing to support student achievement, well-being and safety including:

- Professional and para-professional support to address student well-being and safety, including social workers
- Additional school staff to provide a caring adult to all students
- Mental health supports for students and staff
- Additional Curriculum Support
- Continued Tutoring Supports
- Increased Support for Safe and Caring Schools, including wrap-around services to support violence reduction in schools and school communities including communitybased programming
- Literacy and Numeracy Increased Supports
- Funding to Support the Right to Read Recommendations
- Funding to Support Professional Development of Staff
- Funding Support for Increase Inflation Costs
- Funding to cover the historic and current unfunded increases in statutory benefits
- Lifting the Moratorium on School Closures
- Return of the Efficiency and Modernization funding to support structure improvements in boards
- Funding to support the improved accessibility in schools for all students and staff
- Increased funding to support a 1 to 1 device strategy for all students
- Cyber Security
- Ventilation improvements to reduce the spread of illness in schools

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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	<ul> <li>Ability to timing access needs of students</li> <li>Support marginalised communities and newcomers</li> <li>Support inclusion of student in regular classrooms</li> </ul>
Social Work Staff	<ul> <li>Due to 12-18 month wait times in community agencies additional supports for students in school are needed</li> <li>Increased need for mental health supports</li> </ul>

Speech-Language Pathology	<ul> <li>Growing demand for Speech-Language Pathology due to:         <ul> <li>The 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</li> <li>The increased need for AAC devices for our most vulnerable students who are non-verbal</li> <li>The negative impact of the pandemic on our youngest students' social, emotional ability to effectively communicate</li> <li>The increasing number of Human Rights complaints regarding the level of SLP services</li> </ul> </li> </ul>
Occupational Therapists and Physiotherapists	<ul> <li>Decrease marginalization of equity-deserving groups with the highest needs</li> <li>Increased capacity building for educators re: proper use of OT/PT equipment that accommodates Special Education and Inclusion needs</li> <li>decrease the number of human rights' complaints pertaining to lack of OT/PT access and supports</li> </ul>
Child and Youth Services	<ul> <li>Increase support for the mental health needs of students and the ability to provide direct service (e.g. short term counselling, restorative circles, etc.)</li> </ul>

#### **Additional Curriculum Support**

Additional curriculum support in the form of both resources and staff would have an impact on student achievement. The TDSB is grateful for the additional funding received this year to support numeracy and literacy staffing, which allowed us to increase our allocation of Early Literacy Intervention Teachers(ELIT). These teachers work directly in schools supporting student learning in historically underserved communities and those where literacy results have not been at anticipated levels. The need for these ELIT teachers is significant to support student achievement and teacher capacity development. Similarly, funding to support the creation of teachers who act as Math Learning Partners (MLP) in classrooms has been significant. These roles are similar to coaches but they also work directly in classrooms with students. Engaging in co-constructing learning with students and staff in classrooms. Both ELIT and MLP have had a significant impact on improving competency and confidence in reading, writing and math within these classrooms.

#### **Continued Tutoring Supports**

Tutoring supplements the great work educators are doing in class, by providing access to additional support outside of school hours. Tutoring programs empower students to get help with their school work and develop their skills at times and locations which work best for their individual needs. Tutoring has helped students strengthen foundational, literacy and math skills, and provides homework help in all curriculum areas. Based on a survey conducted in 2022-2023, parents/guardians/caregivers reported their children better understood what they were learning in class, were more confident completing assignments, and less stressed. Students themselves reported feeling their school performance had improved as a result of tutoring.

Recognizing that each student has unique needs and circumstances, a tutoring plan must be equally diverse. Tutoring can take place in school, in the community, and online and the

types of tutoring offered is determined through local decisions in collaboration with board staff, focusing on underserved communities and reflective of student needs. For example, tutoring programs would include: Intensive Reading Supports, Literacy/Numeracy Supports, Peer Tutoring, Online and Community-based tutoring.

To implement a tutoring plan that will serve students from K to 12 across the board will require funding that is consistent and long-term. In-school programs need time to get organized, 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.

# Increased Support for Safe and Caring 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, and 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

## **Literacy and Numeracy Increased Supports**

Funds to create a central kindergarten support team that would include Speech and Language, instructional leaders providing job embedded learning, creation of demonstration classrooms focused on building capacity in our system.

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

# Funding to Support the Right to Read Recommendations

Additional funding is required to continue the professional training for central staff, principals, superintendents and teachers. Based on 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 but face significant challenges based on the size of the organization. Another key need is for 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.

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 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.

# **Funding Support for Increase Inflation Costs**

All school boards are experiencing high rates of inflation, which are impacting their ability to meet the costs of utilities, materials, and repair and maintenance costs. As TDSB is in an active construction market, it is experiencing increased material and labour costs with aging infrastructure. The Ministry needs to provide increased funding to support these inflationary costs.

Funding to Cover the Historic and Current Unfunded Increases in Statutory Benefits
The Ministry of Education has not funded the increases in statutory benefits since 21-22.
The CPP maximum pensionable earnings and employer rate increased by 0.25% in 2021
and thereafter each year. Starting in January 2024, a second earnings ceiling limit is
introduced, that will require incremental employer CPP contribution. These increases
resulted in an additional negative budget pressure, which has been growing since 21- 22
with no funding increase. The projected in year additional budget pressure to year 23-24 is

\$4.2M. In prior years, the TDSB was able to absorb the increase to CPP costs through operational savings, but given TDSB's deficit position, additional funding is needed to cover these cost increases. The Ministry has not provided funding to cover CPP cost adjustments, hence this will continue to be a cost pressure for school boards in years with a high increase in rates. 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.

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 as supply costs, premiums and LTDI claims continue to increase. To address increasing costs in these areas, school boards require resources to manage absenteeism, and to ensure staff have the support and accommodations they need to return to work.

# **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 help facilitate long-term planning and prudent utilization of resources. In addition, the TDSB recommends revisions to the Pupil Accommodation Review Guidelines (PARG). The recommended revisions include providing the opportunity for student voice and input when a school closure is considered, and standardized tools for assessing information received during a Pupil Accommodation Review (PAR) process.

# Return of the Efficiency and Modernization Funding to Support Structure Improvements in Boards

As school boards endeavour to modernize and automate processes to become more efficient and effective, funding is needed to complete this work. Many school boards do not have the financial ability to take on these projects. We ask that the Efficiency and Modernization funding process be resumed where boards can submit business cases for funding to support these important improvements.

Funding to Support the Improved Accessibility in Schools for all Students and Staff The Toronto District School Board 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.

# Increased Funding to Support a 1 to 1 Device Strategy for all Students

The 1:1 Student Device Program for students in Grades 5 and 9 offers students 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. Students can take the device home each night, on weekends and over holidays. 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. These technology advancements need to be supported with additional Ministry funding so school boards can provide a safe and effective learning environment for our students.

#### **Cyber Security**

In support of technology in classrooms to support student learning and achievement, there also needs to be investments into cyber security protection. Recent audit findings from the Office of the Auditor General of Ontario have 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 help mitigate against risk of loss resulting from cyber threats and incidents. These technology advancements need to be supported with additional Ministry funding so school boards can provide a safe and effective learning environment for our students.

#### **Ventilation Improvements to Reduce the Spread of Illness in Schools**

Ventilation is one strategy to help reduce the number of contaminants in the air and improve indoor air quality. The TDSB has focused on several areas to improve ventilation in schools and keep students and staff healthy. A number of measures are underway for the 2023 – 24 school year and continued investment is required.

Ongoing filtering of air includes maintaining approximately 16,000 institutional-grade HEPA units in schools to enhance air cleaning in every occupied classroom, portable, and resource room, as well as other instructional spaces that do not have mechanical ventilation, maintaining frequent and regular filter changes in existing ventilation system throughout the school year, and specifying MERV 13 filters for any new mechanical equipment (this was initiated in 2021). The TDSB also continues to address local projects to improve ventilation. We have invested more than \$165 million (funded through School Condition Improvement

grant and the COVID-19 Resilience Infrastructure funding, received at the end of February 2020) and although there is no building code or legislative requirement to install CO2 monitoring devices in individual classrooms, the TDSB is installing CO2 sensors and occupancy sensors on new ventilation equipment, to monitor fresh air delivered to the school and occupancy levels. This program is closely coordinated with Building Automation Systems (BAS) upgrades and new installations, and the recommissioning of ventilation system controls.

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.