



Bill 52 Hearing Submission Prototype

On behalf of its 60,000 members across Ontario, OSSTF/FEESO is pleased to be able to make this submission to the Social Policy Committee on Bill 52, *The Learning to Age 18 Act*.

Since our submission in August, OSSTF has obtained further detail on the possible implementation of this Bill. This new information has prompted OSSTF/FEESO to seek further opportunity to reinforce our strong objections to this Bill. It has become clear that the ramifications of Bill 52 pose serious problems for the public secondary school environment in Ontario. It has become obvious that no amendments are possible which would adequately prevent the potential harm caused by the introduction of widespread dual/external credits by unspecified and unlimited providers of “equivalent learning.”

OSSTF/FEESO has grave concerns with the nature of the equivalent learning program outlined in Bill 52. We believe that appropriate equivalent learning opportunities are currently available and being offered in many district school boards.

Expansion and increase of the availability of equivalent learning opportunities is **already possible** under *Ontario Secondary Schools, Grades 9-12: Program and Diploma Requirements, 1999*:

- Section 7.1.2 describes “locally developed courses”
- Section 7.4 describes “Specialized Programs,” which also includes “School-Work Transition Programs” (Section 7.4.3)
- Section 7.5 describes “Cooperative Education and Work Experience”
- Section 7.11 deals specifically with “Programs for Students At Risk,” and references all of the above
- Section 7.14 describes “Technology in Education”

An examination of these sections reveals that opportunities for equivalent learning already exist. **Bill 52 is therefore, NOT necessary.** In fact, many district school boards already provide on-going projects that meet the intentions expressed in Bill 52:

- in the Algoma DSB there is a Motive Power Co-op program affiliated with Sioux College in which Grade 12 students who have an interest in transportation technology, but who would not be expected to graduate to post-secondary education, are given co-op placements in local businesses. The classroom component is taught by their co-op teacher at a Sioux College location with college faculty support.
- in the Durham DSB there is a program for at-risk senior students in which they travel to Durham College with their secondary school teachers to be taught mathematics and other academic subjects in the college setting, by their qualified and certified teachers. College faculty also present and



support the learning. The intent is to retain senior students likely to drop out and to allow them to gain their needed secondary credits as well as to introduce them to the college environment. Late in the school year these senior students, who would otherwise be unlikely to contemplate a post-secondary academic future, are enrolled in the college program.

- in the Niagara DSB there are several on-going projects. Students have been receiving high school credits for three years through work on Habitat For Humanity projects that have the direct supervision of their secondary teachers. This year the project is a pilot for the Specialist High Skills Majors initiative. Grade 11 and 12 students are also working in two Lighthouse Projects; one attached to the viticulture industry and another affiliated with a local builder/developer.

The development, implementation and maintenance of specialized locally-developed courses is costly. Currently, there is no separate additional funding. The government has directed pilot funding to a variety of these courses and must now provide funding on an ongoing basis. (As seen in these examples, courses can be developed in collaboration with local community groups or employers).

More than 1500 credits of a similar nature are being offered across Ontario under existing legislation this year.

The inclusion of universities as possible granters of dual/external credits demonstrates the loss of focus in addressing the needs of at-risk students facing the prospect of not graduating.

The graduation rate for students taking university level credits is extremely high. By extending the dual/external credits to these relatively successful students we can only conclude that the intent of the legislation is to open the door to voucher style education.

The expansion of eligibility for dual/external credits to students of all ages also demonstrates the lack of focus on the original audience and goal of Bill 52 to reduce the dropout rate for 16 to 18 year old students. Fourteen and 15 year old students cannot drop out and programs currently exist to deal with those at special risk such as Supervised Alternative Learning for Excused Pupils (SALEP) defined by Regulation. The language in Bill 52 regarding dual/external credits suggests a move to a voucher style education system.

Credits obtained through instruction offered at external sites by uncertified “providers” without the direct involvement of certified secondary school teachers raises serious concerns regarding the quality of teaching, the quality of learning and the safety of students.

Quality of Teaching by Instructors

OSSTF/FEESO is proud to represent professional instructor members who provide non-credit teaching in many continuing education environments in district school boards around the province.

Bill 52, however, allows for up to eight secondary school credits (27% of an OSSD) to be delivered by a “qualified instructor” as dual/external credits and not by certified secondary teachers delivering credits in secondary schools. OSSTF is opposed to this model of credit delivery. We believe that all courses which lead



to an OSSD must be delivered or supervised by certified, qualified secondary school teachers in order to maintain the integrity and value of the OSSD, which is nationally and internationally recognized.

At a time when teachers in Ontario are held to a high standard of professional competence, Ontario students deserve better than to receive their secondary school credits from uncertified “instructors.” The uncertified “instructors” would have had no formal teacher-training, would not have been screened through a criminal record background check, and would not be required to abide by the professional and ethical standards established by the Ontario College of Teachers.

Only trained and certified secondary school teachers, with the invaluable assistance of board-employed professional support staff, have the professional knowledge and skills to ensure learning and diploma success for adolescents of all learning styles, abilities and needs.

Dual/external credit “providers” may use staff who:

- are not certified teachers
- have no professional teacher training
- do not have the range of instructional, assessment and evaluation strategies required by the Ontario Secondary School (OSS) curriculum
- do not have the special education knowledge necessary to adapt/modify lessons for special needs students
- do not have the breadth of OSS curriculum knowledge to be able to make connections to other OSS courses, to avoid duplicating course expectations in other OSS courses, or to make assumptions regarding what prior knowledge students may or may not have
- have no specialized training in teaching adolescents, and on such things as Sabrina’s Law
- have no access to Ontario School Records (OSRs)
- are not subject to Teacher Performance Appraisal by their employers
- are not subject to the requirement for criminal background checks
- have no teacher training in boundary issues
- are not required to abide by the professional and ethical standards established by the Ontario College of Teachers and are not subject to scrutiny, discipline or censure by the College
- have no opportunity to receive the New Teacher Induction Program (NTIP)



- have no legislated responsibility to communicate with parents resulting in much reduced access to the instructor for feedback regarding student progress, attendance and behavior.

Quality of Dual/External Programs and Courses

Bill 52 contains no developed standards on programs or courses to be offered as dual/external credits. Reference is only made to guidelines to be developed under the powers of the Minister which directs boards to create policies and procedures. There are no details on critical issues such as:

- the nature of providers of external credits
- the screening of providers in the future
- the review of course content offered by providers
- course content consistency between providers
- defining the length and rigour of course content
- the monitoring of attendance of students
- the replacement of absent instructors.

This lack of detail means that:

- dual/external credit courses can be 45-65 hours versus OSSD courses which are 110 hours
- dual/external credit courses taught externally will not have the same standards as OSS courses in terms of curriculum expectations and instructional/assessment/evaluation practices
- students will not have the same access to professional support services (guidance, educational assistants, professional student services personnel)
- health and safety conditions for students (who already face a very high injury rate in industry) could be compromised at external sites because there will be no monitoring by a certified teacher to ensure that sites are suitable and safe locations for learning
- there will be a scheduling impact on the rest of the student's program, if the dual/external credit course is taught at an external site.



Negative Effects on School System

The move to dual/external credits based on equivalent learning will also have an adverse impact on Ontario's education system as a whole. Some of these negative effects should be emphasized.

- the high regard for the OSSD, based on the rigour and value of the curriculum and the quality of teachers, will be lost with the inclusion of dual/external credits taught by uncertified providers or instructors and not subject to recognized Ministry standards
- any reduction in district school board funding as a result of the transfer of funds to external providers will result in lost opportunities for students remaining in an underfunded system, especially in specialized courses in the arts and technology areas which will be offered as dual/external credits
- the mandatory inclusion of dual/external credit courses could lead to the cancellation of other optional courses
- it is not clear who will bear the responsibility to do the administrative work associated with these courses
- direct costs to the district school board for transportation, materials and supports will be significant and not supportable within the current funding model
- as seen in the British Columbia model, most dual/external credits will be offered in music, dance and fine arts with few offerings in areas that would serve the interests of those students who are at high risk of not achieving an OSSD.

Summary

OSSTF/FEESO has grave concerns with the nature of the equivalent learning program in Bill 52. We believe that appropriate equivalent learning opportunities are currently available and are being offered in many boards.

Expanding and increasing the availability of equivalent learning opportunities is **already possible** under *Ontario Secondary Schools, Grades 9-12: Program and Diploma Requirements, 1999*. Reading these sections reveals that opportunities for equivalent learning already exist. Therefore **Bill 52 is NOT necessary**. Ongoing funding for successful pilot projects is needed.

The implementation of Bill 52 could lead to a devaluation of the Ontario Secondary School Diploma and the secondary school environment in Ontario. No amendments are possible which would adequately prevent the harm caused by the introduction of widespread dual/external credits by unspecified and unlimited providers of equivalent learning.

OSSTF/FEESO recommends that Bill 52 be withdrawn.