



Bill 52 – *The Learning to Age 18 Act* – OSSTF Concerns

What is Bill 52?

Bill 52, *The Learning to Age 18 Act*, as proposed by the McGuinty government, focuses on two issues:

- requiring students to remain in school until age 18, either in school or in “equivalent learning” situations
- setting out enforcement mechanisms to ensure that students remain in school until age 18, such as by withholding an Ontario driver’s license from those who drop out.

What are OSSTF’s concerns with Bill 52?

Educators encourage students to remain in school by providing an inviting, engaging learning environment that serves their needs. Secondary students who have difficulties with school will not be more engaged with learning by denying them a driver’s license.

The Ministry believes that students should be provided with more choice by allowing organizations and agencies external to school boards to offer “equivalent learning” courses that would count the same as credit courses currently offered by school boards towards a secondary school diploma. The Ministry would also like to expand the dual credit concept to allow community colleges or universities to offer more courses to secondary school students that would count as credits both for purposes of a secondary school diploma *and* a college diploma or university degree. The Ministry has proposed that students be able to enrol in equivalent learning for up to eight courses out of the 30 courses required for a secondary school diploma.

OSSTF supports students remaining in school until age 18. In fact, post secondary education itself is now a virtual requirement for success in obtaining employment and earning a good living.

Equivalent learning, however, as a route for students to achieve credits towards a secondary school diploma, raises serious professional, pedagogical and safety issues that OSSTF simply cannot ignore.

Quality of Instruction

Secondary school credit courses are taught or supervised by teachers who are members of the Ontario College of Teachers. They received their teacher training at accredited Ontario faculties of education or similarly recognized institutions in other provinces or



countries. Specialists in their subject fields, they have extensive training and experience teaching adolescents.

Externally offered courses, as proposed, would be taught by instructors who do not belong to a professional college nor possess this same training or breadth of experience. If funding follows the student for up to eight credits, Ontario will essentially have introduced voucher education.

Quality of Learning

An Ontario secondary school credit course is 110 hours in length. Curriculum is determined by the Ontario Ministry of Education. Course outlines, learning materials and assessment practices are thoroughly examined and reviewed in order to meet the highest educational outcomes for students at all grade levels. A wide variety of professional support services are available in secondary schools to enable all students to receive the different types of learning assistance required. An Ontario Secondary School Diploma (OSSD) is highly regarded world wide.

Credits obtained through instruction offered at external sites by uncertified instructors without the direct involvement of certified secondary school teachers raise serious concerns.

Externally offered courses would not necessarily be subject to the same scrutiny in terms of length, quality, learning materials or assessment practices. Support services would undoubtedly be unavailable for many students choosing these courses. Compromising the integrity of Ontario secondary school credit courses or tarnishing the image of the OSSD is not worth the cost of introducing “equivalent credits” for Ontario students.

Quality of the Learning Environment

Parents know that the secondary schools operated by Ontario school boards offer safe and secure learning environments with highly trained professional staff. Parents know that all school board staff have undergone criminal record checks and are evaluated on a regular basis. The health and safety of all students are uppermost in the minds of school staff. Good communication with parents is practiced and expected.

Can parents have confidence that the facilities where externally offered courses will be taught will provide the same safe and secure learning environment that secondary schools provide? Will the necessary safeguards to ensure student safety be in place? Will the quality of instruction be equal to the standards of practice expected of Ontario's certified teachers who must belong to the Ontario College of Teachers?



Bill 52 Funding Impact

The Ministry has proposed that the implementation of Bill 52 will have a net increase in enrolment in the secondary system. They take the position that students who have not thrived in the secondary school environment may re-engage with the help of external and dual credits.

With up to eight credits that can be achieved from external sources and no restrictions on which students can use these credits towards their diploma, there will be an inevitable loss of enrolment to the secondary system. A key piece of the expected regulations attached to Bill 52 is an “incentive” based funding structure. This funding that follows the credit in the secondary system will be the start of voucher education in Ontario. Colleges and universities along with private and religious organizations will be free to access public education funding from these credit vouchers. These institutions have been lobbying aggressively for access to this funding. There is no expectation that the funding leaving the elementary and secondary system will be replaced with other core funding. The resulting funding loss to the public system could be staggering.

The Funding:

In 2006-2007, the base per-student funding averaged over the elementary and secondary panels is over \$8,400. The Foundation Grant and parts of the Pupil Accommodation Grant provide more per-student funding at the secondary level than at the elementary level due to the requirement for additional staff support and more specialized facilities. Therefore the per-student grant in the secondary panel would be closer to \$9000.

The 30 credit requirement for an OSSD over a four- year term (assuming no change in per-student funding over that period), means each secondary credit would be funded at \$1200.

The projected enrolment for 2006-2007 is 680,954 secondary students. Currently secondary students require 30 credits over their four year term to achieve a diploma. Assuming the funding will follow the credits (as reported in government documents) and the maximum of eight credits per-student is moved outside of the public system, over \$6.5 billion in funding would exit the district school boards. The \$1.63 billion yearly loss to the district school boards would have a dramatic effect on their budgeting process.

Too Many Questions

OSSTF has many questions about the consequences of equivalent learning and external credits:

- where will these equivalent learning “courses” be offered?
- who will approve of the providers or the course content?
- will faith based courses be permitted?



- will all the information about providers, including their financial records, be made available to parents and to the public?
- will courses be of the same “rigour” and length as regular Ontario curriculum courses?
- will assessment be done according to Ministry standards?
- how will the attendance of students be monitored?
- how will students be transported to and from external locations?
- who will track the credits earned by students?
- who will actually grant the credit to students taking equivalent learning courses?
- will these courses be open to all students, regardless of ability?
- who will do the associated administrative work associated with these students?
- will students requiring the use of educational assistants and professional student service personnel be able to access these support personnel when they are taking courses external to the school?
- how will parents be able to interact with instructors of these courses?
- will the same courses be offered on a consistent basis or be uniform across the province?
- who will contact students if the teacher of an external course is absent on a given day?
- who will arrange for students to enroll in these courses?
- will the instructors be members of the Ontario College of Teachers?
- will the instructors be subject to performance appraisal and who will do the appraisal?
- will new instructors be subject to the new teacher induction program?
- will all staff associated with these equivalent learning courses be subject to criminal record checks?
- will students be adequately supervised?
- will students be guaranteed a safe learning environment?
- will a secondary school credit retain the same value from the perspective of parents, higher educational authorities, the public and business?
- will students taking external credits receive a diploma or certificate that has real meaning?
- how will the Ministry ensure that dual or external credits taken by students do not reduce funding to school boards?
- will external credit providers receive government funding for the credits they provide or are students going to be required to pay for the services?
- if more students take external equivalent learning courses, will school boards be forced to close schools that will now be underutilized?

What is OSSTF’s recommendation regarding Bill 52?

It is OSSTF’s view that **Bill 52 is unnecessary and must be withdrawn.**



Appropriate equivalent learning opportunities are currently available and are offered in many boards within *Ontario Secondary Schools, Grades 9-12: Program and Diploma Requirements, 1999*. OSSTF endorses changes that would include more funding to update school facilities, provide more in-school course choices for students, and ensure that there are adequate school board employed support personnel for proactive and reactive programs for at-risk students.

The ramifications of Bill 52 would lead to an extreme 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.

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