

# **ETFO Submission to the Ministry of Education on Ontario's Plan to Reopen Schools**

June 2020



Elementary Teachers' Federation of Ontario  
[etfo.ca](http://etfo.ca) | [communications@etfo.org](mailto:communications@etfo.org)



**Elementary Teachers' Federation of Ontario  
Fédération des enseignantes et des enseignants  
de l'élémentaire de l'Ontario**

The union represents 83,000 elementary public school teachers, occasional teachers and education professionals across the province. Its Building Better Schools education agenda can be viewed at **[BuildingBetterSchools.ca](http://BuildingBetterSchools.ca)**.

Elementary Teachers' Federation of Ontario (ETFO)  
136 Isabella Street, Toronto, ON M4Y 0B5  
416-962-3836 or 1-888-838-3836  
[etfo.ca](http://etfo.ca)

Follow us online at:

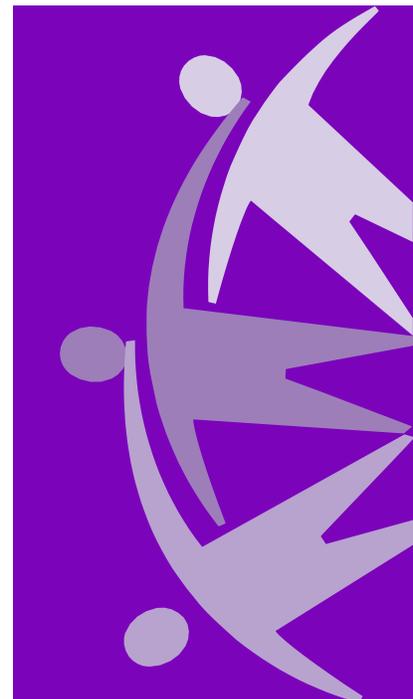


ETFOprovincialoffice



@ETFOeducators

Copyright © June 2020 by ETFO



## TABLE OF CONTENTS

INTRODUCTION .....	1
Meaningful Consultation .....	2
Health and Safety Protocols .....	3
Appropriate Staffing .....	8
Transportation .....	9
Flexibility in Curriculum Delivery and Assessment .....	10
New Mathematics Curriculum .....	11
EQAO Assessments .....	12
Synchronous Learning .....	14
Addressing Equity and Anti-Black Racism .....	15
Accessibility .....	17
Special Education Supports .....	18
RECOMMENDATIONS .....	21
SELECTED SOURCES .....	24
APPENDIX A .....	A
APPENDIX B .....	B

## INTRODUCTION

The Elementary Teachers’ Federation of Ontario (ETFO) welcomes the opportunity to participate in the government’s consultation on its plan to reopen schools. ETFO represents 83,000 elementary public school teachers and education professionals across the province and is the largest teacher federation in Canada.

The ongoing COVID-19 pandemic has created unprecedented challenges for Ontario’s public education system. Ontario, like many other jurisdictions, has been forced to take drastic measures to slow the spread of COVID-19, including the government’s decision to close schools after March break. This decision was welcomed by ETFO as were subsequent decisions to extend the closure until the end of the 2019-20 school year.

Since the beginning of the school closures, and during the past few months of emergency distance learning, educators across the province have responded with flexibility, dedication, creativity and commitment. Educators have stepped up in very difficult circumstances to continue to support students’ learning, and will continue to do so, despite the significant barriers that the pandemic has created.

As the Ministry of Education and school boards plan for the reopening of schools it is important to keep in mind that any plans must comply with contractual obligations under existing collective agreements. Ongoing communication between the Ministry of Education, school boards, ETFO and its locals can help ensure that any measures implemented comply with local collective agreements. ETFO members have continuously demonstrated their dedication to students and to Ontario’s public education system. ETFO stands ready to work in partnership with school boards, the

government and other education partners to ensure a safe and successful return to school for students across the province.

This submission includes some recommendations for the government to consider as it seeks to provide guidance and direction to school boards ahead of a planned reopening of schools. In addition to the recommendations enumerated in this document, Appendix A includes a summary of key considerations for reopening schools provided by ETFO to the Public Health Agency of Canada, and Appendix B discusses ETFO’s serious concerns regarding synchronous learning in elementary instruction. Both appendices were previously shared with the Ministry of Education and should be considered as part of this submission.

## Meaningful Consultation

Over the past few months the Ministry of Education has consulted with stakeholders in the sector while providing guidance to school boards during these unprecedented times. Although the views of ETFO have not always aligned with decisions made by the government on some important issues, the process of engagement with ETFO and other education unions is crucial to the success of our public education system. The work that is being carried out by the various working groups the Ministry of Education created is incredibly important and should continue. As guidelines for reopening schools are developed and updated, drafts should be shared with stakeholder representatives on these working groups with sufficient time to review them and provide feedback before they are announced and shared with the public. As mentioned elsewhere in these submissions, the Provincial Working Group on Health and Safety should also be consulted.

The effects of the pandemic have been felt differently in different regions of the province. Acknowledging this reality, Ontario has adopted a regional approach as it eases public health

restrictions and seeks to reopen workplaces through a multi-stage process. Similarly, the challenges that will be experienced as schools prepare to reopen will vary from one community to the next. The Ministry of Education should provide broad guidelines and principles that school boards need to consider when drafting their reopening plans, while providing sufficient flexibility to school boards to create plans, in consultation with local unions, that fit their local circumstances and comply with local collective agreements.

As the government plans the reopening of schools in Fall 2020, it is important that educators are engaged at every step of the planning process. Meaningful consultation at the provincial, school board and school level are key to ensuring a safe, supportive and welcoming environment in elementary schools across the province.

### **Recommendations:**

1. That the Ministry of Education hold meaningful consultations directly with ETFO and other education unions prior to creating or updating guidelines for school boards on reopening plans.
2. That the Ministry of Education ensure that any guidelines or direction provided to school boards comply with existing collective agreements.
3. That drafts of new or updated guidelines for school boards be shared with ETFO and other working group representatives with sufficient time to review them and provide feedback.
4. That school boards hold meaningful consultations with local unions representing teachers and other education workers prior to creating or updating school reopening plans.
5. That the Ministry of Education provide broad guidelines and principles for school boards to consider when drafting their reopening plans while allowing school boards the necessary flexibility to create plans that fit their local circumstances in consultation with local unions, and in compliance with local collective agreements.

### **Health and Safety Protocols**

The health and safety of students, staff and their respective families must be the overriding principle when deciding when and how schools reopen. The advice and input from public health

experts needs to continue to inform any decisions the government makes regarding how public education will operate over the summer and in the coming school year.

The Provincial Working Group on Health and Safety should also be consulted. While ETFO appreciates the creation of the various working tables by the Ministry of Education, it is concerning that the Provincial Working Group on Health and Safety (PWGHS) has not met this year. As partners in the system, ETFO and other unions representing front-line education workers can provide useful advice from the perspective of the members who will be expected to implement the plans.

On May 8, 2020, the Ministry of Education and others were copied on a submission ETFO made to the Public Health Agency of Canada on their archived document *Public Health Guidance for Schools (K-12) and Childcare Programs (COVID-19)* which is attached to this submission as Appendix A. The submission identified three key recommendations from the *SARS Commission Executive Summary: Spring of Fear*<sup>1</sup>, including ensuring that the Internal Responsibility System and Joint Health and Safety Committees (JHSCs) play a meaningful role in the pandemic response. To have a meaningful role in the pandemic response and carry out their important statutory duties, JHSCs must be involved in risk assessment at the school board and school level. JHSCs need to be consulted on the protocols intended to mitigate the identified risks and how such protocols and measures will be implemented, including training for all staff. JHSCs must also be provided with the timely information and reports necessary to carry out their statutory duties. For example, some of the concerns that arose with school boards’ retrieval protocols could have been avoided with proper consultation with the JHSCs, as required by the *Occupational Health and Safety Act*. The Ministry

---

<sup>1</sup> Campbell, A. (2006), *SARS Commission Executive Summary: A Spring of Fear*.  
[http://www.archives.gov.on.ca/en/e\\_records/sars/report/v1-pdf/Volume1.pdf](http://www.archives.gov.on.ca/en/e_records/sars/report/v1-pdf/Volume1.pdf)

of Labour has been supportive in reinforcing the need for the continued involvement of JHSCs throughout the pandemic in school boards where it was necessary to seek their support for enforcement.

One of the significant challenges that Ontario and other jurisdictions have faced during the COVID-19 pandemic is the lack of sufficient personal protection equipment (PPE) and the inconsistent distribution of PPE to front-line workers. In order for schools to reopen safely, educators and school staff must be provided with the appropriate PPE. The cost and availability of PPE for education workers is a responsibility of employers. School boards need to ensure the timely procurement of PPE and the Ministry of Education must provide sufficient funding to school boards to cover these costs. The government should also help facilitate the procurement of PPE by school boards and ensure that supply chains are ready to maintain a steady supply.

While the guidelines are still being developed, the Ministry of Education should direct school boards to take proactive measures to prepare, including:

- Securing sufficient supplies, including Personal Protective Equipment (PPE) and cleaning supplies before reopening.
- Ensuring adequate ventilation in each room based upon the latest evidence
- Creating inventories of handwashing sinks with warm water to ensure adequate numbers and possible need for portable handwashing sinks and hand sanitizer dispensers.
- Providing floor plans with dimensions (e.g. square footage) of rooms and hallways to staff in advance to assist with planning.
- Identifying physical distancing challenges and proposing solutions.
- Reviewing custodial staffing requirements based on cleaning and disinfecting protocols.

- Reviewing and documenting updated cleaning and disinfecting procedures.
- Investigating possible rental space if necessary, to accommodate smaller class sizes.
- Reviewing student safety plans, behaviour plans and plans of care
- Developing a plan to deal with COVID-19 related bias, harassment or discrimination and a plan to clearly communicate it to all staff, parents and students.
- Develop a protocol for parents and guardians to ensure students who may be infected with COVID-19 do not attend school and comply with public health guidelines for isolation.

In addition to health and safety, mental health, technology, accessibility, and pedagogical issues, the pandemic presents unique human resources issues that will have to be addressed together with ETFO’s locals to ensure collective agreements are respected:

- Accommodating the needs of staff members based on the *Ontario Human Rights Code*, which might include working from home.
- Use of quarantine leave or sick leave while self-isolating.
- Suspend attendance management programs/measures and the requirement to document absences to encourage staff who are ill to stay at home.
- Staffing adjustments/schedules to accommodate smaller class sizes.
- Balancing workload of in-class obligations and distance learning.
- Training and implementation schedule for new protocols, including education workers and occasional staff.
- Funding for additional staff, infrastructure and supplies.

## Recommendations:

6. That the Ministry of Education consider the recommendations made by ETFO to the Public Health Agency of Canada (Appendix A) when creating or updating its plan to reopen schools.
7. That the Ministry of Education allocate additional funding for school boards for the procurement of Personal Protective Equipment (PPE).
8. That the Ministry of Education instruct school boards to provide educators and staff with the necessary PPE.
9. That the Provincial Working Group on Health and Safety (PWGHS) meet to discuss plans for the reopening of schools and provide feedback to the government.
10. That while the Ministry of Education continues to work on creating guidelines for schools reopening, school boards be instructed to begin evaluating the following as soon as possible:
  - a. Securing sufficient supplies including Personal Protective Equipment (PPE) before reopening.
  - b. Ensuring adequate ventilation in each room based upon the latest evidence.
  - c. Creating inventories of handwashing sinks with warm water to ensure adequate numbers and the possible need for portable handwashing sinks and hand sanitizer dispensers.
  - d. Documenting the square footage of each room and hallways and provide them to staff in advance to assist with planning.
  - e. Identifying physical distancing challenges and proposing solutions.
  - f. Reviewing custodial staffing requirements based on cleaning and disinfecting protocols.
  - g. Reviewing and documenting the correct cleaning and disinfecting procedures.
  - h. Investigating possible rental space if necessary, to accommodate smaller class sizes.
  - i. Reviewing student safety plans, behaviour plans and plans of care.
  - j. Developing a plan to deal with COVID-19 related bias, harassment or discrimination and a plan to clearly communicate it to all staff, parents and students.
11. That school boards be instructed to work with local unions to address human resources issues as outlined in the preceding section, in addition to health and safety, mental health, accessibility, pedagogical, and technological issues.

## Appropriate Staffing

As the government plans for various scenarios for the beginning of the 2020-21 school year, it must ensure that appropriate staffing is in place to ensure that teachers, other educators and staff are not overloaded. If the government is considering a mixed model where some students attend school while others continue with distance learning, or where students spend a portion of their time attending school and a portion of their time engaged in distance learning, guidelines should be provided to school boards to ensure teachers are not being asked to perform both in-person instruction and distance learning simultaneously.

In addition to ensuring that contractual obligations in local collective agreements are observed, school boards and the Ministry of Education must also ensure the integrity of the educational programs across the province is maintained. With regards to the Kindergarten program, it is important that a teacher and a designated early childhood educator (DECE) be assigned to every Kindergarten classroom, even in the case of reduced class sizes. The teacher/DECE educator team is central to the success of the program. In particular, in the context of the current pandemic, the complementary skills of the teacher and DECE will be required to provide appropriate support to all Kindergarten students.

One of the challenges Ontario faced when dealing with multiple COVID-19 outbreaks in various long-term care facilities was the number of staff who worked at multiple locations, therefore increasing their risk of exposure, and the risk of spreading the virus. In Ontario’s education system, many staff work in more than one school location, this is particularly the case for occasional teachers, occasional DECEs and other occasional or casual staff. The Ministry of Education should instruct school boards work with local unions to establish guidelines regarding work at multiple sites

with the aim of minimizing the risk of infection for students and educators including occasional teachers, occasional DECEs and other occasional or casual staff.

### Recommendations:

12. That the Ministry of Education’s guidelines to school boards ensure teachers and other educators are not asked to perform duties beyond their regular workload.
13. That the Ministry of Education ensure that all kindergarten classes be staffed by a teacher and early childhood educator.
14. That the Ministry of Education instruct school boards to work with local unions to establish guidelines regarding work at multiple sites that minimize the risk of infection for students and educators including occasional teachers, occasional DECEs and other occasional or casual staff.

### Transportation

Transportation of students to and from school must be addressed by the Ministry of Education in its direction and guidelines to school boards. Social distancing requirements will reduce the number of students who can safely travel on a single school bus.

In many communities, current school bus routes integrate students from various schools and, in some cases, from multiple boards. These routes cannot be maintained in their current form without posing the serious risk of the virus being transmitted broadly. The Ministry of Education should instruct boards to review their school bus routes to minimize the contact between students from different schools and provide funding to support any increase in costs related to the creation of revised bus routes.

School boards will also have to update cleaning protocols for school buses and ensure the availability of PPE for drivers and students. The Ministry of Education should ensure that additional funding is allocated and made available to school boards ahead of the beginning of the 2020-21 school year to cover these costs.

### Recommendations:

15. That the Ministry of Education instruct school boards to review their current school bus routes to minimize contact among students from different schools.
16. That the Ministry of Education provide guidelines to school boards related to transportation including updated bus cleaning protocols, social distance measures and availability of PPE for staff and students on school bus routes.
17. That the Ministry of Education allocate additional transportation funding for school boards to cover the costs associated with modifications to school bus routes, updated cleaning protocols and provision of PPE.

### **Flexibility in Curriculum Delivery and Assessment**

There is no doubt that the school closure and subsequent emergency distance learning has brought incredible challenges to students, their families and educators. In addition to pre-existing barriers faced by many students, the disparity in access to learning resources has compounded existing equity gaps. For students both in small rural and northern communities and in large urban centres, access to broadband internet and the availability of devices such as computers and tablets, among other factors, have had a significant impact on learning outcomes. The resulting disparity in the level of engagement that students have had over the last months of the 2019-20 school year will be carried over to the 2020-21 school year.

Regardless of the model of learning once schools reopen, students, their families and educators will require longer than usual to adjust to the new school year. In addition to adjusting to new health and safety protocols that may include social distancing, a different configuration of classrooms and modified schedules, educators will need additional time to assess students as they are arriving in the next grade and to help those who need support to close any learning gaps before engaging with their new curriculum.

The Ministry of Education and school boards should ensure that expectations on curriculum delivery allow for additional time and flexibility to adjust the new school year. The amount of time

required to appropriately adjust to the new school year will vary from classroom to classroom and school to school. Educators should be granted sufficient flexibility to use their professional judgement to decide how best to help each student catch up and the amount of time that it will take to do so.

Expectations on assessment should also be adjusted to account for an extended period of adjustment. The Ministry of Education and school boards should review the current assessment schedule and consider postponing or cancelling the first progress report card.

### **Recommendations:**

18. That the Ministry of Education adjust expectations on curriculum delivery and assessment to account for a longer than normal transition period at the beginning of the year.
19. That the Ministry of Education review the current assessment schedule and consider cancelling the first progress report card to account for an extended period of adjustment.

### **New Mathematics Curriculum**

The Ministry of Education recently announced that the new mathematics curriculum will be ready to be implemented beginning in the 2020-21 school year. ETFO has only had a brief opportunity to study the new curriculum, but it is clear that there has not been sufficient consultation with educators and other stakeholders to ensure that this revised curriculum meets the needs of students and that it can be successfully delivered this coming fall.

In the best of circumstances, it would be challenging to implement a new mathematics curriculum in such a compressed timeline. Under the current circumstances created by the COVID-19 pandemic, it would be imprudent to proceed with a mandatory implementation of this new curriculum in the 2020-21 school year.

Professional development, including in-service training, needs to be an integral part of the implementation of any new curriculum. A plan to provide teachers, including occasional teachers, with training on the new mathematics curriculum, with an appropriate timeframe given the anticipated challenges of the upcoming school year, needs to be developed.

Postponing the implementation of the new mathematics curriculum would provide the Ministry of Education with additional time to consult with ETFO and other education partners on the content of the curriculum and, once the content has been finalized, plan for appropriate professional development to ensure the success of the new curriculum.

### **Recommendations:**

20. The Ministry of Education should delay the implementation of the new math curriculum at the very least until the 2021-22 school year and use the additional time to hold meaningful consultations with stakeholders.
21. The Ministry of Education should ensure that paid professional development for teachers is included in the implementation plan for the new math curriculum.
22. If the Ministry of Education decides to proceed with the implementation of the new math curriculum during the 2020-21 school year, it should make the new curriculum optional and not mandatory for the first year.

### **EQAO Assessments**

The most effective assessment of student progress is a teacher’s daily assessment. Teachers strive to balance their instruction with assessment strategies that provide students with immediate feedback about their progress and help them to work more productively on their own and with other students. Teachers use this ongoing assessment to reflect upon their instruction, improve their teaching strategies and respond to individual student needs and learning styles.

ETFO has consistently raised concerns about how Education Quality and Accountability Office (EQAO) assessments, first administered in 1997, have negatively affected elementary classrooms

by promoting an overly-narrow focus on literacy and numeracy to the detriment of a more holistic program and by creating a test-driven school culture.

The tests and the required preparation for the tests consume considerable classroom time and create stress for students and teachers. This is particularly concerning for students in Grade 3. Other jurisdictions such as England<sup>2</sup>, Singapore<sup>3</sup> and New Zealand<sup>4</sup> are moving away from mandatory standardized testing for younger students to avoid a negative impact on students. Given that EQAO assessments provide no data that can be used to inform daily instruction and student learning throughout the year and concerns about unnecessary stress and negative impacts on younger students, it is unnecessary to continue the Grade 3 assessment.

While ETFO also has concerns about the reliability and misuse of the data gathered by EQAO assessments and the merits of standardized testing which are not outlined here, it is clear that in the midst of the COVID-19 pandemic, EQAO assessments would create undue pressure on students, their families and educators at a time where educators need to focus on supporting students through these difficult times. Based on the information currently available regarding the development of a vaccine and/or possible treatments for COVID-19, it is likely that Ontario will be dealing with disruptions caused by the pandemic for the next year to two years. ETFO recommends that at the very least EQAO assessments for all elementary students be suspended for the 2020-21 and 2021-22 school years.

---

<sup>2</sup> Adams R. (September 14, 2017) “Sats for seven-year-olds in England to be scrapped” *The Guardian (UK)*, Retrieved November 11, 2018, from [theguardian.com/education/2017/sep/14/sats-for-seven-year-olds-in-england-to-be-scrapped](https://www.theguardian.com/education/2017/sep/14/sats-for-seven-year-olds-in-england-to-be-scrapped)

<sup>3</sup> *Opening Address by Mr. Ong Ye Kung, Minister for Education, at the Schools Work Plan Seminar* (2018), Ministry of Education. Singapore. Retrieved December 5, 2018, from [moe.gov.sg/news/speeches/opening-address-by-mr-ong-ye-kung--minister-for-education--at-the-schools-work-plan-seminar](https://moe.gov.sg/news/speeches/opening-address-by-mr-ong-ye-kung--minister-for-education--at-the-schools-work-plan-seminar)

<sup>4</sup> *National Standards Removed* (2017), Ministry of Education. New Zealand. Retrieved December 5, 2018 from [education.govt.nz/news/national-standards-removed/](https://www.education.govt.nz/news/national-standards-removed/)

### Recommendations:

23. That EQAO assessments be cancelled and the funds reallocated towards front-line education programs.
24. That, if system-wide assessments are to be maintained, EQAO assessments be suspended for the 2020-21 school year.
25. That, if system-wide assessments are to be maintained, the Ministry of Education refrain from releasing assessment data in a way that facilitates the ranking of schools.
26. That teachers’ professional judgement be respected, and more emphasis be placed on the role of ongoing teacher assessment of student progress.

### Synchronous Learning

During the month of May, ETFO expressed serious concerns about the use of synchronous learning in elementary instruction during the pandemic (Appendix B). These concerns include pedagogical, technological, privacy, equity and safety challenges, which have yet to be resolved or addressed in a meaningful way. While the government has recommended that school boards use synchronous learning as part of whole class instruction, it has not significantly resolved some of the existing barriers for many students and educators.

Educators across the province have incurred significant costs associated with internet access and data plans in order to provide emergency distance learning, including synchronous learning. However, many boards have refused to refund those expenses, leaving many educators with significant out-of-pocket expenses. The Ministry of Education should provide funding to school boards to support increased technology costs and require that school boards reimburse educators for any out-of-pocket expenses related to distance learning, including any expenses incurred during synchronous learning.

The announcement by the government of federal funding allocated for the expansion of broadband internet access for various regions of the province highlights the large gap in access to online resources that currently exists in Ontario. While the expansion of broadband internet access is a

welcome step, this will not immediately resolve the issue of access to online learning resources, in particular to synchronous learning resources, for many students and educators. Even if the federal government allocates the funding the province has requested, the deployment of new infrastructure will take time. Another significant gap in internet access is not related to the availability of broadband infrastructure but rather the affordability of internet services. Despite significant efforts made by school boards to close the gap in access to devices and internet service many students still don’t have access to an appropriate device and stable connectivity.

The decision on when and how to use synchronous learning is one that is best left to educators. Teachers use their professional judgement to assess the best way to support students, based on their individual needs. School boards and the Ministry of Education should ensure that teachers feel supported in using their professional judgement to make such decisions.

### **Recommendations:**

27. That the Ministry of Education reverse its stance on synchronous learning and recommend that any school board policies on the use of synchronous learning respect the professional judgement of teachers.
28. That the Ministry of Education provide funding to school boards to cover increased technology costs and require that boards reimburse educators for out-of-pocket expenses incurred during distance learning.
29. That the Ministry of Education address the concerns raised by ETFO on the use of synchronous learning contained in Appendix B.

### **Addressing Equity and Anti-Black Racism**

The COVID-19 pandemic has highlighted the deep-rooted socio-economic disparities that exist in communities across province, the country and the world. The negative impacts of the pandemic have been disproportionately felt by already marginalized communities.

Intersections of gender, race, sexuality, disability, status, language, employment precarity and a host of other factors have had a tremendous impact on how students and their families have experienced this ongoing crisis. When it comes to public education, social determinants have in many cases influenced the type of access, if any, that students and their families have had to learning resources and support.

Over the past few weeks, there has been a wide-spread and unprecedented public recognition that systemic racism and in particular, anti-Black systemic racism persists in our societies. ETFO recognizes the multiple and systemic ways that anti-Black racism is enacted and reproduced in all of our institutions, including policing, health care, immigration, social services, and public education.

Anti-Black racism in education is longstanding and has harmed Black students, their families, and Black educators. In the past several years alone, a number of school boards have come under intense public scrutiny following the exposure of anti-Black racism in their practices. School boards, and the provincial government need to be accountable to existing anti-Black racism policies and push for more such policies to be introduced.

Equity needs to be a central component of any public policy that deals with our public education system. Planning for the reopening of schools is no exception. Equity needs to be embedded in all stages of the planning process. The Ministry of Education should instruct school boards to consider the impact of their reopening plans on students, with a particular emphasis on students that have been traditionally marginalized including Black students, Indigenous students, other racialized students, students with disabilities, students with unique learning needs, and those that struggle with economic and other precarity. School boards should determine when additional programming or supports are required in order to ensure equitable access to education. The Ministry of

Education should allocate additional funding that school boards can access in order to address identified equity gaps.

### Recommendations:

30. That the Ministry of Education instruct school boards to address anti-Black racism in their local planning to reopen schools.
31. That the Ministry of Education utilize an equity lens throughout all stages of planning for the reopening of schools and that it instruct school boards to do the same.
32. That the Ministry of Education allocate additional funding to allow school boards to address systemic barriers as they plan to reopen schools.

### **Accessibility**

The arrival of emergency distance learning triggered by the COVID-19 pandemic has created a number of accessibility challenges for many students across the province. Despite efforts made by the Ministry of Education and school boards, many of these challenges remain and have a significant impact on the ability of students with disabilities to participate in learning activities. Educators are continuously making efforts to ensure that all students are able to participate in learning activities, but they need the support of school boards and the Ministry of Education.

ETFO echoes many of the concerns raised by the AODA Alliance in their recent correspondence with the Minister of Education. Accessibility cannot be treated as an afterthought as plans to reopen schools are drafted. Barriers to accessibility should be identified and addressed at every stage of the planning process, and solutions should be sought to support students and front-line educators.

When establishing social distancing and health and safety protocols, school boards and schools must ensure that those protocols identify any barriers that students with disabilities might encounter and remove those barriers. At the school level, staff need to be fully involved in the development of

safety procedures to ensure those who work directly with students with disabilities can flag any issues that may arise and allow the school administration to proactively resolve them.

During the current period of school closures, emergency distance learning has required the use of online platforms by educators and students across the province. The Ministry of Education should provide guidelines to school boards that address accessibility concerns when choosing online platforms, adopting learning resources and materials, and creating communication protocols.

### Recommendations:

33. That the Ministry of Education address accessibility concerns at every stage of the planning process as they prepare to reopen schools.
34. That the Ministry of Education instruct school boards to address accessibility concerns in their plan to reopen schools.
35. That the Ministry of Education provide accessibility guidelines to school boards to assist them in choosing online platforms, adopting learning resources and materials and creating communication protocols.

### **Special Education Supports**

Prior to the COVID-19 pandemic there was broad recognition in Ontario that funding for special education supports and programs was not sufficient to meet the needs of students. The reality is that integrating students with unique learning needs into Ontario classrooms requires more resources to support both the students and the classroom teacher in terms of training, staffing and material resources. In the context of the current pandemic, the support for students with unique learning needs has taken on heightened importance. For many students, the availability of sufficient and appropriate staff to support their learning will make the difference between being able to participate in school-based learning or having no meaningful access to public education altogether.

In its 2017 annual survey of elementary and secondary schools, People for Education, a non-profit advocacy organization, indicated that 61 per cent of elementary schools reported having insufficient

access to a psychologist to adequately support students and 13 per cent of elementary schools reported that psychologist services are unavailable. Forty-seven per cent of elementary schools reported that child and youth worker services are not available.<sup>5</sup> The needs of students in the context of the ongoing public health and economic crisis will only increase, and unless resources are increased, the lack of appropriate support for many students will only become more dire. The provincial government must increase its funding for educational assistants, psychologists, behavioural therapists, school support counsellors, child and youth workers and speech-language pathologists.

Over the past few years, ETFO has advocated to change the special education funding model to ensure that funding is tied to actual individual student needs instead of relying on a predictive statistical model. In the absence of addressing the ongoing gaps in special education funding by reviewing how this funding is calculated and allocated, the government should, at the very least, allocate additional temporary funding to be made immediately available to school boards for special education programs and supports for the 2020-21 school year.

Expectations should also be adjusted regarding the updating of Individual Education Plans (IEPs). The current expectation that IEPs be updated within the first 30 days of the instructional year is not realistic in the context of the current pandemic. The Ministry of Education should review this requirement and postpone the deadline for updating IEPs to account for a longer period of adjustment at the beginning of the 2020-21 school year.

Some students require additional support, including assistance with physical, personal care, behavioural and other needs. The Ministry of Education should provide school boards with clear

---

<sup>5</sup> People for Education (2017). *Competing Priorities* (Annual Report on Ontario’s Publicly Funded Schools 2017). Toronto, ON: People for Education

guidelines to ensure that educators and staff working with students who need such supports are able to do so safely. When it is determined that it is not possible to safely provide this assistance, there should be a clear process for students, families, educators and administrators to seek alternate ways to support these students’ learning.

### Recommendations:

36. That the funding model for special education be based on actual student need.
37. That until the current funding model for special education is reviewed, the government allocate additional temporary funding for special education programs and support for the 2020-21 school year.
38. That funding be increased for educational assistants, psychologists, behavioural therapists, school support counsellors and speech-language pathologists.
39. That the Ministry of Education extend the timeline for updating Individual Education Plans to account for a longer period of adjustment during the 2020-21 school year.
40. That the Ministry of Education provide guidelines to school boards to ensure the safety of educators and other staff working with students who require mobility assistance or toileting assistance.

## RECOMMENDATIONS

1. That the Ministry of Education hold meaningful consultations directly with ETFO and other education unions prior to creating or updating guidelines for school boards on reopening plans.
2. That the Ministry of Education ensure that any guidelines or direction provided to school boards comply with existing collective agreements.
3. That drafts of new or updated guidelines for school boards be shared with ETFO and other working group representatives with sufficient time to review them and provide feedback.
4. That school boards hold meaningful consultations with local unions representing teachers and other education workers prior to creating or updating school reopening plans.
5. That the Ministry of Education provide broad guidelines and principles for school boards to consider when drafting their reopening plans while allowing school boards the necessary flexibility to create plans that fit their local circumstances in consultation with local unions, and in compliance with local collective agreements.
6. That the Ministry of Education consider the recommendations made by ETFO to the Public Health Agency of Canada (Appendix A) when creating or updating its plan to reopen schools.
7. That the Ministry of Education allocate additional funding for school boards for the procurement of Personal Protective Equipment (PPE).
8. That the Ministry of Education instruct school boards to provide educators and staff with the necessary PPE.
9. That the Provincial Working Group on Health and Safety (PWGHS) meet to discuss plans for the reopening of schools and provide feedback to the government.
10. That while the Ministry of Education continues to work on creating guidelines for schools reopening, school boards be instructed to begin evaluating the following as soon as possible:
  - a. Securing sufficient supplies including Personal Protective Equipment (PPE) before reopening.
  - b. Ensuring adequate ventilation in each room based upon the latest evidence.
  - c. Creating inventories of handwashing sinks with warm water to ensure adequate numbers and the possible need for portable handwashing sinks and hand sanitizer dispensers.
  - d. Documenting the square footage of each room and hallways and provide them to staff in advance to assist with planning.
  - e. Identifying physical distancing challenges and proposing solutions.
  - f. Reviewing custodial staffing requirements based on cleaning and disinfecting protocols.
  - g. Reviewing and documenting the correct cleaning and disinfecting procedures.

- h. Investigating possible rental space if necessary, to accommodate smaller class sizes.
  - i. Reviewing student safety plans, behaviour plans and plans of care.
  - j. Developing a plan to deal with COVID-19 related bias, harassment or discrimination and a plan to clearly communicate it to all staff, parents and students.
  - k. Develop a protocol for parents and guardians to ensure students who may be infected with COVID-19 do not attend school and comply with public health guidelines for isolation.
11. That school boards be instructed to work with local unions to address human resources issues as outlined in the preceding section, in addition to health and safety, mental health, accessibility, pedagogical, and technological issues.
  12. That the Ministry of Education’s guidelines to school boards ensure teachers and other educators are not asked to perform duties beyond their regular workload.
  13. That the Ministry of Education ensure that all kindergarten classes be staffed by a teacher and early childhood educator.
  14. That the Ministry of Education instruct school boards to work with local unions to establish guidelines regarding work at multiple sites that minimize the risk of infection for students and educators including occasional teachers, occasional DECEs and other occasional or casual staff.
  15. That the Ministry of Education instruct school boards to review their current school bus routes to minimize contact among students from different schools.
  16. That the Ministry of Education provide guidelines to school boards related to transportation including updated bus cleaning protocols, social distance measures and availability of PPE for staff and students on school bus routes.
  17. That the Ministry of Education allocate additional transportation funding for school boards to cover the costs associated with modifications to school bus routes, updated cleaning protocols and provision of PPE.
  18. That the Ministry of Education adjust expectations on curriculum delivery and assessment to account for a longer than normal transition period at the beginning of the year.
  19. That the Ministry of Education review the current assessment schedule and consider cancelling the first progress report card to account for an extended period of adjustment.
  20. The Ministry of Education should delay the implementation of the new math curriculum at the very least until the 2021-22 school year and use the additional time to hold meaningful consultations with stakeholders.
  21. The Ministry of Education should ensure that paid professional development for teachers is included in the implementation plan for the new math curriculum.
  22. If the Ministry of Education decides to proceed with the implementation of the new math curriculum during the 2020-21 school year, it should make the new curriculum optional and not mandatory for the first year.

23. That EQAO assessments be cancelled and the funds reallocated towards front-line education programs.
24. That, if system-wide assessments are to be maintained, EQAO assessments be suspended for the 2020-21 school year.
25. That, if system-wide assessments are to be maintained, the Ministry of Education refrain from releasing assessment data in a way that facilitates the ranking of schools.
26. That teachers’ professional judgement be respected, and more emphasis be placed on the role of ongoing teacher assessment of student progress.
27. That the Ministry of Education reverse its stance on synchronous learning and recommend that any school board policies on the use of synchronous learning respect the professional judgement of teachers.
28. That the Ministry of Education provide funding to school boards to cover increased technology costs and require that boards reimburse educators for out-of-pocket expenses incurred during distance learning.
29. That the Ministry of Education address the concerns raised by ETFO on the use of synchronous learning contained in Appendix B.
30. That the Ministry of Education instruct school boards to address anti-Black racism in their local planning to reopen schools.
31. That the Ministry of Education utilize an equity lens throughout all stages of planning for the reopening of schools and that it instruct school boards to do the same.
32. That the Ministry of Education allocate additional funding to allow school boards to address systemic barriers as they plan to reopen schools.
33. That the Ministry of Education address accessibility concerns at every stage of the planning process as they prepare to reopen schools.
34. That the Ministry of Education instruct school boards to address accessibility concerns in their plan to reopen schools.
35. That the Ministry of Education provide accessibility guidelines to school boards to assist them in choosing online platforms, adopting learning resources and materials and creating communication protocols.
36. That the funding model for special education be based on actual student need.
37. That until the current funding model for special education is reviewed, the government allocate additional temporary funding for special education programs and support for the 2020-21 school year.
38. That funding be increased for educational assistants, psychologists, behavioural therapists, school support counsellors and speech-language pathologists.
39. That the Ministry of Education extend the timeline for updating Individual Education Plans to account for a longer period of adjustment during the 2020-21 school year.
40. That the Ministry of Education provide guidelines to school boards to ensure the safety of educators and other staff working with students who require mobility assistance or toileting assistance.

## SELECTED SOURCES

Campbell, A. (2006), *SARS Commission Executive Summary: A Spring of Fear*.  
[archives.gov.on.ca/en/e\\_records/sars/report/v1-pdf/Volume1.pdf](http://archives.gov.on.ca/en/e_records/sars/report/v1-pdf/Volume1.pdf)

Adams R. (September 14, 2017) “Sats for seven-year-olds in England to be scrapped” *The Guardian (UK)*, Retrieved November 11, 2018, from [theguardian.com/education/2017/sep/14/sats-for-seven-year-olds-in-england-to-be-scrapped](http://theguardian.com/education/2017/sep/14/sats-for-seven-year-olds-in-england-to-be-scrapped)

*Opening Address by Mr. Ong Ye Kung, Minister for Education, at the Schools Work Plan Seminar* (2018), Ministry of Education. Singapore. Retrieved December 5, 2018, from [moe.gov.sg/news/speeches/opening-address-by-mr-ong-ye-kung--minister-for-education--at-the-schools-work-plan-seminar](http://moe.gov.sg/news/speeches/opening-address-by-mr-ong-ye-kung--minister-for-education--at-the-schools-work-plan-seminar)

*National Standards Removed* (2017), Ministry of Education. New Zealand. Retrieved December 5, 2018 from [education.govt.nz/news/national-standards-removed/](http://education.govt.nz/news/national-standards-removed/)

People for Education (2017). *Competing Priorities* (Annual Report on Ontario’s Publicly Funded Schools 2017). Toronto, ON: People for Education.

FC:MG:MW

# APPENDIX A



## Elementary Teachers' Federation of Ontario (ETFO)

Fédération des enseignantes et des enseignants de l'élémentaire de l'Ontario (FEEO)

136 ISABELLA ST

TORONTO ON M4Y 0B5

Telephone: 416-962-3836 Toll-free: 1-888-838-3836

Fax: 416-642-2424

etfo.ca

### Key Considerations when Re-opening Schools

*Public Health Agency of Canada: Public health guidance for schools (K-12) and childcare programs (COVID-19)*

- The federal guidance document is currently archived and being updated. It currently does not apply to bus transportation providers or the community use of schools;
- ETFO understands this is subject to change as new information on transmissibility and epidemiology becomes available;
- ETFO has created a list of other suggestions and questions when reviewing and updating this document; and
- The Ministry of Health and Ministry of Labour often do not have an understanding of the everyday functioning of schools.

### Buy-in from Staff and Addressing Anxiety

A quote from the PHAC guide: "To combat misinformation, it is important to provide accurate information and education targeted to school boards, educators, parents and students/children on COVID-19 and measures to protect themselves, while reinforcing the message that the risk to Canadians remains low."

If risks are higher than "low" and physical distancing or other requirements are still in place, we should expect additional precautions in the PHAC document. The following are examples of additional precautions that could be included depending on what is recommended by public health authorities at the time:

- Signage on the doors reminding people who enter about symptoms, quarantine and self-isolation rules, and physical distancing;
- Parents' access to the school prohibited or restricted with signage on the doors indicating not to enter;
- Pre-entry assessment survey requiring disclosure of travel, etc.;
- Plexiglass at office reception counters;
- Partial/gradual return schedule, i.e. 1/5 attend each day, morning/afternoon split, grade levels, regions, etc.;
- Use of additional spaces (may also be offsite locations) and increased staff to reduce class sizes;
- How to assign and monitor small student groups (if permitted);
- Review of adequate ventilation in each room (in light of the most recent evidence and outbreaks);
- Masks (provided when physical distancing is not possible, and if they are not required will they be allowed); and
- Physical distancing guidelines for buses and bus stops (may require more buses or staggered times).

How will staff be accommodated if additional cleaning is required to address anxiety? Messaging will need to be provided to non-custodial staff about the requirement to use only board-approved cleaning supplies, if provided (funding) and trained to do so in between regular custodial cleaning. Reminder that staff are prohibited from using their own cleaning supplies due to potential chemical interactions and scent sensitivities.

### **Occupational Health and Safety Act and the Joint Health and Safety Committee**

In order to get buy-in from staff, they will need to feel that the employers have taken every reasonable precaution according to the Occupational Health and Safety Act.

The SARS Commission report outlined the necessity of the involvement of Joint Health and Safety Committees for consultation and input during a pandemic since workers know their workplaces best:

- Consultation on new chemicals;
- Consultation on new protocols;
- Consultation on training;
- Informed of incidents of occupational disease;
- Involved in hazard assessment; and
- Represent workers in work refusals.

Each school board should have a pandemic plan accessible to all staff that outlines these procedures, roles and responsibilities in general and refers to the guidance of the local health authorities.

### **Physical Distancing**

There is not a section on this topic in the current guide and it will be particularly difficult for small children. Will masks be provided if physical distancing is not possible?

Advice or restrictions should be considered for the following:

- Physical education or activities which do not allow physical distancing;
- Extracurricular activities or other specific activities;
- Carpet time and assemblies;
- Recess;
- Entry times;
- First aid attention, if required, or if dealing with an ill student; and
- Medical procedures, toileting, feeding, physical interventions (ed. workers).

Protocols could include, but not be limited to:

- Staggered schedules;
- Reinforce 2 metre distance for lines by marking floor;
- Remove or restrict access to play centres;
- Increase distance between desks, moving classes from portables to gym;
- Restrict student movement during rotary/prep coverage; and
- Lunch and breakfast program protocols.

### **Reinforce "No Sharing" Policies**

Should certain activities be limited or stopped until a certain date?

- Instrumental music and vocal music;
- Computer labs, shared iPads;
- Libraries;
- Toys and manipulatives; and
- Physical education activities which require cleaning of gym equipment.

If/when these activities resume, cleaning/disinfection protocols need to clearly indicate who is responsible, how they will be trained, what cleaning products will be supplied and the protocol for cleaning items after each use.

### **Reporting to the Public Health Authority and Provision of Information**

- Reporting to PHA should be included in the pandemic plan and in training for principals and JHSCs – symptoms, absenteeism greater than expected, etc.;
- If the PHA informs a school of a possible exposure, how will staff, students and parents be informed? Staff have a right to know about cases assessed by a health practitioner, as a presumptive case or a confirmed case, in a timely manner. Will all parents be notified as well? and
- What will the criteria be for temporarily closing a school? (i.e. currently, fast food outlets have been required to close for two days to deep clean.) Will people with more direct contact be expected to self-isolate? How will it be determined who has been exposed?

### **Supporting those Self-monitoring for Symptoms or Self-isolating**

- Attendance management programs for staff should be stopped;
- Requirement for medical notes should be eliminated;
- Will staff in high-risk categories be permitted to stay home with pay or use sick leave? Will staff who live with family members in high-risk categories be eligible for paid leave?;
- Have the boards developed and communicated a plan to deal with COVID-19 related bias, harassment or discrimination and clearly communicated it to all staff?; and
- Are there safe protocols for delivery of homework materials to and from the home?

### **Management of Students/Children with Possible COVID-19**

- Plan/space for separating and supervising students who show symptoms, until they can go home;
- Notify parents/guardians if their child begins to show symptoms. What is the plan if they do not respond?;
- Mode of transportation (i.e., avoid school bus or public transit, protocol for sending student in taxi, etc.); and
- Will staff be trained on recognizing symptoms? There are some legal concerns about this requirement.

### **Hand Hygiene**

- Adequate supplies of soap and paper towels at each handwashing sink;
- Clear signage should indicate if a sink should not be used for handwashing due to adverse water tests or inadequate temperatures. Some school boards maintain sinks in all classrooms. Some classroom sinks are used only for science or art;
- Portable handwashing stations are preferred over hand sanitizer, if required;

- If hand sanitizers are wall-mounted, what is the supervision requirement at each grade level?;
- Age-appropriate signage with visual cues for proper handwashing posted at each handwashing sink;
- Reconsideration of school/classroom policies that may limit trips to the washroom while still controlling the number of students in the halls and washrooms; and
- Classrooms without handwashing sinks need schedules for using the washroom before recess and lunch and may require staggered recess and lunch times.

### **Maintain Cleaning and Disinfecting Protocols/Procedures (based on public health requirements for COVID-19)**

- Review list of high-touch surfaces with JHSC;
- Review cleaning products and Safety Data Sheets with JHSC;
- Review training with JHSC;
- Determine cleaning and disinfection schedule (i.e. twice a day and immediately upon known contamination);
- Staffing: Many schools do not have a full-time daytime custodial staff and do not replace absent staff (funding); and
- Supplies: Ensure adequate supplies of cleaning materials, PPE if required or recommended (funding).

### **Respiratory Etiquette**

- Age-appropriate training videos on handwashing and respiratory hygiene; and
- Provision of tissues (funding).

### **Keeping Parents/Caregivers Informed**

- Keeping students home if symptomatic or if someone else in the home is symptomatic and unable to fully isolate due to childcare requirements;
- No rewards for attendance; and
- Messaging to parents about the provision of tissues and hand sanitizer, depending on the age and ability of the student, including reminders about scent sensitivities and chemical interactions.

### **Psychosocial Considerations**

- Mental health supports during the school day for students and staff; and
- Provision of online supports.

# APPENDIX B



**Elementary Teachers' Federation of Ontario (ETFO)**  
**Fédération des enseignantes et des enseignants de l'élémentaire de l'Ontario (FEEO)**

136 ISABELLA ST  
TORONTO ON M4Y 0B5  
Telephone: 416-962-3836 Toll-free: 1-888-838-3836  
Fax: 416-642-2424  
etfo.ca

May 6, 2020

Nancy Naylor  
Deputy Minister of Education  
Ministry of Education  
5th Flr, 438 University Ave  
Toronto ON M7A 2A5

Dear Nancy Naylor:

I am writing today to express concerns regarding “synchronous learning” and our fundamental objection to it being mandated or encouraged as a learning tool during this pandemic.

As you are well aware, until recently the Ministry of Education did not support nor advocate for the use of synchronous learning with students, a position which ETFO strongly supported. Nevertheless, some boards have recently reversed their stance on it and will now allow teachers to use Board-approved technology for synchronous instruction. Unfortunately, however, the underlying problems created by synchronous learning, which the Ministry has previously acknowledged, continue. The Ministry should strongly discourage the use of synchronous learning until these fundamental issues are addressed.

Synchronous learning presents pedagogical, technological, equity and safety challenges, namely:

1. In multiple student families, where parents may also be working from home, children may not have access to the necessary technology when lessons are being delivered at a specific time. There could also be issues with Wi-Fi limitations in the household. Students who cannot access the technology and miss the lesson are then left further behind their peers.
2. Synchronous learning requires that teachers and students have the necessary technology tools available. To date, boards across the province have had to deliver

equipment to students and, several weeks into distance learning, there are still many families without the necessary tools. Staff and students in rural and northern areas of the province don't have the same access to reliable and affordable internet services.

3. There is no reliable data on the level of engagement and more importantly the number of students who are simply not taking part in the programming that is currently being provided. There is no reason to assume that there will be significantly greater "up take" of synchronous learning, assuming all the hardware and software issues can be resolved.
4. Not all teachers will have Board provided hardware that supports the full range of synchronous learning. Teachers, therefore, may be required to resort to using personal devices – a practice that is highly problematic and creates another equity challenge for boards to address.

Synchronous learning also presents professional challenges that have not been addressed, namely:

1. Teachers cannot control who is accessing the programming and who might be recording it. There is also no way to know what is done with a lesson once recorded. Student privacy and safety may be jeopardized as there is no way to control where or how a recording is posted or shared.
2. Because it is in real time, there is no practical ability to address issues that might arise, such as student behaviour and the abuse of the live feed. This, in turn, exposes teachers to potential allegations of professional misconduct that could be promptly addressed and avoided in a non-synchronous teaching environment.
3. Students may be exposed to inappropriate behaviours (racism, sexism, homophobia, etc.) that would be better addressed and more effectively dealt with in a classroom setting.
4. Real time learning may also serve to heighten the marginalization that some children face due to issues of poverty and other differences that are more apparent to their classmates in this format.

ETFO has significant concerns regarding student safety when it comes to digital communication. Several recent studies have indicated that this pandemic has put children at increased risk of online exploitation. Normalizing livestream interaction with young children without careful examination of the implications could have longstanding negative consequences.

While ETFO can strongly advise its members of the perils and shortcomings of synchronous learning, they will quite likely be exposed to pressure from their Boards and, perhaps, even their colleagues to undertake this pedagogical approach. ETFO

strongly urges the Ministry to address this matter and confirm its initial prohibition against this practice, which is contrary to the best interests of students and teachers.

Sincerely,

A handwritten signature in black ink, appearing to be 'Sharon O'Halloran', with a long horizontal flourish extending to the right.

Sharon O'Halloran  
General Secretary

SO:JA



Elementary Teachers' Federation of Ontario (ETFO)  
Fédération des enseignantes et des enseignants  
de l'élémentaire de l'Ontario  
136 Isabella Street, Toronto, ON M4Y 0B5  
416-962-3836 or 1-888-838-3836  
[etfo.ca](http://etfo.ca)