

February 25, 2022

VIA EMAIL: specialeducation@ontario.ca

Hon. Stephen Lecce, Minister of Education
Ministry of Education
15th Floor, 438 University Ave.
Toronto, Ontario M5G 2K8

Dear Minister Lecce,

Re: Comments with respect to PPM No. 81

I am writing to you on behalf of the members of Durham District School Board's (DDSB) Special Education Advisory Committee (SEAC). Our SEAC includes eight parent associations, who represent thousands of families in Durham Region.

We would like to first express our support with regards to the goal of providing evidence-based health, rehabilitation and other community-based clinical services in school settings to ensure timely and equitable services that allow students to fully participate in all aspects of school life. However, we want to stress the importance that the appropriate time and care needs to be taken to ensure that any move to school-based health, rehabilitation and other clinical services is done right. For families and students who depend on these services, ensuring that any transition made is made seamlessly, with no break in service provision for their children is of utmost importance.

Timelines and consultation process

We are concerned with the limited timeframe allowed for input in the consultation process. Given the important nature of the services reflected in PPM No. 81 the tight timeframe limits the ability of schools, SEACs, services providers and families' to provide meaningful consultation. We would request that the Ministry extend the timeline for providing input in the consultation process to ensure that stakeholders have an opportunity to provide fulsome submissions to ensure that the implementation of PPM No. 81 meets its objectives and causes no unintentional harm to those it seeks to support.

Timelines for implementation

We are very concerned with the expectation that full implementation would be achieved by September 2022. Time needs to be provided for the proper consultation to occur to allow proper implementation of PPM No. 81. Some of the many examples of concerns would be:

1. Differentiated access that creates inequity in services and supports impacting children, youth and families.

2. Shortages and waitlist of community health supports to provide supports in schools occurring while the board is having difficulty in addressing current support needs within the schools.
3. The impacts related to shift of school-based rehabilitative services to Children's Treatment Centres has not been fully evaluated and shared publicly.
4. Proposed changes would result in significant increase to private and community, both regulated and currently unregulated (e.g., IBI), providers having access inside school spaces.
5. Current and continuing lack of funded space in schools and type of space required by the variety of professional health services to be provided by both district, private and community providers.
6. Delegation of health care acts to school board staff.
7. Time to develop MOUs with the various service providers which detail responsibilities and how services providers will engage students within the schools, etc.
8. Prevalent medical conditions such as diabetes, seizures disorders, anaphylaxis, etc. does not appear to be referenced or captured under the revised PPM 81.
9. Clarity and planning specific to workplace and related liability protections for service professionals and school districts.

There is also concern regarding case management of all providers to meet the goal of seamless services for the student between home and schools. Some of these concerns are, but not limited to, the supervision of students using remote care providers; needs for after-hours services; appropriate access to physical space that is respectful of the student and provider's services; needs in buildings at or need capacity.

When considering the above and the physical, social and emotional safety of the students who are accessing services needs to be carefully thought out. At all times, consideration must be taken to ensure that the confidentiality and dignity of students is respected during the transition periods where services provided will take them away from peers and then have them return.

These are just a few of the many considerations that must be considered before community-based service providers can be brought into a school.

We would submit that a central consultation working group with key partners and people with lived experience could be put in place by September 2022 to develop a solid and seamless plan for this transition by September of 2023. The ability to have full implementation of PPM No. 81 by September 2022, raises serious concerns that implementation of PPM 81 can be done well and without detrimental effects to students and families.

Inclusion/exclusion of services

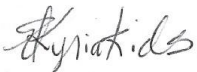
On a cursory review of PPM No. 81, we note that DHH Infant hearing program goes from 0-6 years of age, but has not been mentioned in the integration of services. We are concerned that other services may also have been overlooked.

Roles of families

Some services rely on the caregiver/family of the student to be present. How would this be managed within this service provision model? We note that PPM No. 81 mentions consultation but is silent on implementation.

In conclusion, while we commend the goals of PPM No. 81, we are concerned about the timeline for consultation and implementation. The implementation of this PPM should not be done in haste. It requires careful planning and development of an implementation process to ensure any transition happens seamlessly and without any service disruption to students and their families. We strongly suggest that the Ministry of Education reconsider the expectation that School Boards have PPM 81 fully implemented by September 2022, and consult with key partners and persons with lived experience to develop a framework and implementation plan for PPM 81, that is in the best interest and support of students.

Sincerely,



Eva Kyriakides

SEAC Chair

Durham District School Board

cc: Chairs of Ontario Special Education Advisory Committees