

## Chapter 3

### Section 3.08

#### Ministry of Education

# Ministry Funding and Oversight of School Boards

## 1.0 Summary

The Ministry of Education (Ministry) funds 72 district school boards to provide elementary and secondary education to about two million students (as of the 2016/17 school year). The school boards comprise 31 English public boards, 29 English Catholic boards, four French public boards and eight French Catholic boards. Collectively, there are approximately 4,590 schools, 113,600 teachers and 7,300 administrators in the system.

The Province shares responsibility with municipalities for funding school boards. Each municipality collects from its property owners the Education Property Tax, which it remits to its local school boards. In the 2016/17 school year, the Ministry and municipalities combined provided school boards with \$22.9 billion in operating funding through what is known as the Grants for Student Needs. These comprise foundation grants (intended to cover the basic costs of education common to all students and all schools) and special purpose grants (intended to address specific needs that may vary among school boards). Also, the Ministry provided an additional \$212 million in operating funding to school boards through transfer payments called Education Programs—Other (EPO). These two funding streams represent about 90% of the operating funding available to school boards.

The remaining 10% is available to school boards primarily through funds generated by the schools themselves, and grants and fees from other provincial ministries and the federal government.

Province-wide, about 30% of the GSN funding comes from the Education Property Tax while the remaining 70% comes from the Ministry.

With respect to oversight of school boards' use of operating funds, the Ministry is responsible for the development and implementation of policy for funding the boards. This includes the administration of operating grants and the implementation and monitoring of policies and programs. It is also responsible for providing advice and assistance on financial matters related to school boards. Its key oversight functions include monitoring the financial health of Ontario's school boards; conducting enrolment audits; developing audit tools and the framework for school boards' audit committees and regional internal audit teams; and establishing reporting and accountability requirements associated with administering grants to school boards.

We noted that the Ministry receives considerable information from school boards to monitor student performance and the boards' financial situation. In addition, we found that the Ministry has processes in place to check the reasonableness of financial data submitted to the Ministry electronically. Specifically, it monitors budget submissions to ensure school boards are in compliance with legislated



limits on in-year deficits. It also conducts audits of enrolment data. However, we found there are still opportunities for the Ministry to improve its oversight of school boards.

Most significantly, we found that the Ministry does not assess and address whether students with similar needs receive the same level of support no matter where they live in the province. This is for several reasons, including that the Ministry does not confirm that special purpose funding is spent as intended, does not allocate funding based on actual needs, and does not analyze whether additional funding provided for some students is actually achieving the intended results. There are often significant differences between funding allocated for specific purposes and the amounts school boards actually spend for these purposes; if the Ministry analyzed this information, it might highlight issues with the validity of its funding formula.

Also, we noted that the Ministry gives school boards considerable discretion in how they spend the funding they receive. Its justification for this is that school boards are each governed by an elected board of trustees who have responsibility for making autonomous decisions based on local needs. For the 2016/17 school year, about 84% of operating funding from the Ministry could be spent at the school boards' discretion including about two-thirds of the special purpose grants—provided for specific groups of students, for specific purposes, or “top-ups” to the foundation grants. If the majority of the funding for the 13 special purpose grants is discretionary, then the needs that these grants were originally intended to meet are potentially not being met.

Our more significant audit findings are as follows:

- **Funding formula uses out-of-date benchmarks and is due for a comprehensive external review.** In 2002, an independent task force reviewed the Ministry's complex formula for determining school boards' funding. The task force recommended that the Ministry annually review and update the

benchmarks used in the formula and conduct a more comprehensive overall review of the formula every five years. Fifteen years later, the Ministry has not commissioned another independent review of the funding formula. With respect to benchmarks, although the Ministry regularly updates those benchmarks associated with negotiated labour costs, it does not regularly update others, which are based on socio-economic and demographic factors. For example, the majority of special purpose funding that is calculated and allocated based on census data, approximately \$1 billion, uses census data that is more than 10 years old.

- **Grants for specific education priorities are not always allocated according to actual student needs.** The Special Education Grant is intended for students who need special-education programs and services. However, half of the special-education funding is allocated based on a school board's average daily enrolment of all its students, instead of the number of students who are receiving special-education programs and services. But the portion of special-education students in each board is not the same. This percentage ranged from 8% to 28% depending on the board. We also noted that special education needs are generally growing faster than total enrolment—over the 10-year period ending 2015/16, total student enrolment decreased 5% provincially while special education enrolment increased by 21%. We found that if the Ministry had allocated this half of the special-education funding based on the actual number of students receiving special-education programs and services, \$111 million would have been allocated differently across the boards. Based on our calculation, 39 boards would have received an average of \$2.9 million more in funding, and 33 boards would have received an average of \$3.4 million less. One board would have received \$10.4 million



more, while another board would have received \$16.1 million less.

- **The Ministry is not ensuring that funding for specific education priorities is being spent as intended.** In 2016/17, only 35% of \$10.9 billion in special purpose funding was restricted in use; that is, it had to be spent for the purposes for which it was allocated. Except for restricted funding, the Ministry does not require boards to report how the individual grants that comprise the overall Grants for Student Needs (GSN) were spent. Rather than report expenses back to the Ministry according to how funding was allocated, school boards are required to report all expenses under five general expense categories: instruction; administration; pupil transportation; pupil accommodation; and “other.” This means that where funding is provided for a specific purpose, such as for teaching English as a second language, its use is reported back to the Ministry, combined with expenses for all other purposes, under the five categories. Further, school boards report their total expenses from all sources of funding, not only what was provided by the Ministry. This prevents the Ministry from understanding whether the funding allocations, particularly for special purpose grants, reflected the actual needs of school boards. For some school boards, we noted differences between what boards were allocated and what they actually spent. For example, about three-quarters of school boards spent at least \$100,000 less than their allocated amount for school repairs and renovations, with one board spending \$13.9 million less than allocated. On the other hand, almost 80% of school boards spent at least \$100,000 more than their allocated amount for special education, with one board spending as much as \$81 million more than allocated.
- **The Ministry does not know whether additional funding for some students is**

**achieving intended results.** Although the Ministry allocates significantly more money per student to some boards rather than others because of such factors as the socio-economic conditions in the area, geographic location, and the level of salaries of teachers, it does not know if this additional funding is achieving the intended results. This is, in part, because it does not compare and analyze actual expenses of school boards on a per-unit basis, such as per student or per school. The Ministry told us it does not perform such an analysis because school board unit costs can be significantly impacted by regional cost differences and demographics. However, we noted that the Ministry does not even compare boards with similar attributes, such as those located within the same geographic area, boards with similar demographics, or boards with similar population density. Such analysis could help the Ministry identify boards that are not operating efficiently or highlight where further review is necessary. Our analysis of unit costs showed significant cost variances by region. However, we also noted significant unit costs variances between boards in the same region. For example, the average instructional cost per student in rural northern boards ranged from \$11,800 to \$17,000.

- **Still unclear if correlation exists between unit costs and student performance results.** The amount school boards spend on classroom instruction does not appear to have a direct relationship to student performance. Our analysis showed boards in the north spent more per student on instruction compared with boards in the south, but performance results in northern boards was much lower. However, French-language boards spent more on instruction per student and achieved higher student performance on average than English-language boards. If the Ministry analyzed this data in greater detail, it could gain a better understanding of what additional



funding measures could potentially improve student achievement, and which ones are unlikely to positively impact student results.

- **Students performing below provincial standard in mathematics.** Students have been performing below the standard in Grades 3 and 6 math and Grade 9 applied math since at least 2008/09. However, the Ministry has not acted quickly enough to bring about improvement in math results. In fact, the elementary level math results have gotten worse. The main root causes of poor performance identified by the Ministry, following consultation with stakeholders initiated in November 2015, included the need for educators to increase their knowledge of the mathematics curriculum, related pedagogy (effective teaching strategies), and effective assessment and evaluation practices. We also noted that elementary schools have single-subject teachers for certain subjects, including French, physical education and music, but generally not mathematics. Starting in September 2016, the Ministry announced \$60 million to help support students achieve better results in math.
- **Deteriorating schools and low school utilization are posing challenges to school boards.** Between 2011 and 2015, the Ministry engaged a third party to assess the condition of each school in the province, resulting in an estimate that total repair costs needed up to 2020 would be \$15.2 billion. At the same time, almost 600 schools (or 13% out of 4,590 schools in Ontario) are operating at less than 50% capacity across the province. Such circumstances have created a situation where boards are having to decide whether to close or consolidate schools, or find alternative solutions. The Ministry's decision to phase out "top-up" grants for under-utilized schools will increase the pressure on school boards in this regard.
- **Few enrolment audits are being done by the Ministry, despite significant errors**

**noted during audits.** Over the six-year period from 2011 to 2016, enrolment was audited at only 6% of schools—3% of all elementary schools and 18% of all secondary schools—this, despite the fact that the amount of funding allocated to each school board is based to a large extent on overall student enrolment. In the last three years alone (2014–16), based on the audit files we reviewed, audits resulted in school boards' operating funding being reduced by \$4.6 million due to errors by school boards in recording the enrolment of students.

- **There is no cap on the maximum individual class size for students in Grades 4 to 12.** Only classes for Grades 1 to 3 have a maximum class size restriction of 23 students, and starting in the 2017/18 school year full-day kindergarten has a maximum class size restriction of 32 students. For all other grades, school boards are restricted to an average class size by board, meaning that not all students will be benefitting from smaller class sizes. For secondary school classes, all boards have the same cap on the average class size by board, which is 22 students. However, for Grades 4 to 8, the Ministry has set different caps on the average class size by board depending on the board. Half have an average class size restriction of 24.5 and the other half have an average cap ranging from 18.5 to 26.4 students. In June 2017, the regulation on class size restrictions was amended to reflect the fact that starting in the 2021/22 school year, all boards will have an average class size restriction of 24.5 or fewer students. However, the amendment did not introduce a cap on the maximum individual class size for all grades.

This report contains 15 recommendations, consisting of 23 actions, to address our audit findings.



## Overall Conclusion

The Ministry of Education (Ministry) needs to improve the effectiveness of its oversight procedures to ensure that taxpayer dollars it uses to fund school boards are used in relevant cases according to legislation, contractual agreements, or Ministry policy. The Ministry could not demonstrate that funding objectives were consistently being met or that funding was always being spent fully in accordance with its intent (for example, in the case of students who are at risk of poor academic achievement).

### OVERALL MINISTRY RESPONSE

The Ministry of Education thanks the Auditor General and her team for their recommendations on how the Ministry can continue to improve education in Ontario.

Ontario's success as a leading education system is a result of the Ministry working closely with our education partners to improve student achievement, equity and the well-being of students and staff. The impact of this collaborative approach is reflected in higher student achievement and higher rates of high school graduation.

We know there is still work to be done to provide equitable outcomes for students with unique needs, for example, Indigenous learners and students with special education needs. That is why we are working closely with our education and community partners toward improving outcomes for at-risk students. The Ministry has also released a three-year Education Equity Action Plan that is intended to identify and eliminate discriminatory practices, systemic barriers and bias from Ontario schools and classrooms to support the potential for all students to succeed.

In addition, Ontario makes some improvements to the funding formula every year, in consultation with our partners and based on research and data. We are providing targeted and differentiated supports to improve teaching and learning in classrooms, schools and boards

across Ontario. This is evident in approaches like our Renewed Math Strategy or investments to support new staff for special education needs. The Grants for Student Needs and the Education Program—Other provides a system of funding that recognizes the diversity of learners and the differences in communities across the province.

We will continue to use research and review and assess evidence to inform policy and funding decisions. We are also committed to considering the Auditor General's recommendations in our annual funding consultations and other working groups.

Our goal is always to make the best evidence-based decisions to support Ontario's children in reaching their full potential.

## 2.0 Background

### 2.1 Overview

The Ministry of Education (Ministry) funds 72 district school boards to provide elementary and secondary education to about two million students (as of the 2016/17 school year). There are four types of school boards and each serves all areas of the province. In total, Ontario has 31 English public boards, 29 English Catholic boards, four French public boards and eight French Catholic boards. Collectively, there are approximately 4,590 schools, 113,600 teachers and 7,300 administrators in the system.

The Ministry is responsible for developing curriculum, setting requirements for student diplomas and certificates, determining the overall funding level for school boards and how the funding will be allocated to individual boards, paying the provincial portion of funding to school boards, and ensuring that school boards comply with the requirements of the *Education Act, 1990* (Act) and its regulations.



School boards and the Ministry have different fiscal periods. School boards report expenses based on the school year, which is from September 1 to August 31. The Ministry reports its consolidated financial information based on the Province's fiscal year, which is from April 1 to March 31. For this reason, funding to school boards reported in the Province's Public Accounts does not directly agree to the audited financial statements of school boards.

The Province shares responsibility with municipalities for funding school boards. Each municipality collects from its property owners the Education Property Tax, which it remits to its local school boards. In the 2016/17 school year, the Ministry and municipalities combined provided school boards with \$22.9 billion in operating funding through what is known as the Grants for Student Needs. Also, the Ministry provided an additional \$212 million in operating funding to school boards through transfer payments called Education Programs—Other (EPO). These two funding streams represent about 90% of the operating funding available to school boards.

The remaining 10% is available to school boards primarily through funds generated by the schools themselves through fundraising and tuition from foreign students, and grants and fees from other provincial ministries and the federal government.

Province-wide, about 30% of the GSN funding comes from the Education Property Tax and the remaining 70% comes from the Ministry, but this can vary significantly from municipality to municipality.

The Ministry's key oversight functions with respect to funding include monitoring the financial health of Ontario's school boards; conducting enrolment audits; developing audit tools and the framework for school boards' audit committees and regional internal audit teams; and establishing reporting and accountability requirements associated with administering grants to school boards.

## 2.2 Funding and Financial Information

### 2.2.1 Grants for Student Needs

Grants for Student Needs (GSN) is a collection of several grants, many of which are made up of two or more components, described in detail each year in a regulation under the Act. In the 2016/17 school year, the GSN comprised 15 grants with 74 components; each component has its own formula for calculating the amount of funding that each school board will receive. These grants can be grouped into four general categories:

- **Funding for classrooms**—focuses on providing classroom resources, such as teachers, education assistants, textbooks and classroom supplies.
- **Funding for schools**—provides funding for school administration and the cost of maintaining and repairing school facilities.
- **Funding for specific education priorities**—provides funding to help reduce the gap in achievement results between specific groups of students and overall student results; for example, by meeting students' special-education needs, improving language proficiency in the language of instruction and providing support to Indigenous students. The Ministry refers to this as "closing the achievement gap."
- **Funding for other specific purposes**—provides funding for school board administrative costs and other activities that support education but are not related to the categories above, such as transporting students to and from school.

The GSN is divided into two types of grants that each account for about half of the GSN's total funding—foundation grants (of which there are two) and special purpose grants (of which there are 13). Foundation grants are intended to cover the basic costs of education common to all students and schools. Special purpose grants are intended to address specific needs that may vary among school boards, taking into account such factors



as demographics, school location and special education needs.

See **Figure 1** for a breakdown of the GSN by category. The percentage of allocation in each category has been consistent over the last decade.

School boards can use any unspent funding in the following year. Unspent restricted funding must be spent on the restricted purpose in the following year. According to the Ministry, although funding may not be formally restricted (as in the case for foundation grants), compliance with regulatory requirements may effectively restrict the use of that funding. For example, class size restrictions can dictate the number of teachers and hence the level of spending.

### 2.2.2 Transfer Payments for Education Programs—Other (EPO) Grants

Unlike the GSN, which is established by legislation annually, the funding stream called Education Programs—Other (EPO) is funded through a series of individual transfer payment agreements between the Ministry and funding recipients, including school boards and other parties.

In 2016/17, the Ministry administered 64 types of EPO grants to school boards totalling \$212 million or 0.9% of total education operating funding.

### 2.2.3 Total Funding per Student

Provincially, the total funding per student has increased 24% over the past ten years, from \$9,500 in 2007/08 to \$11,800 in 2016/17. Almost all of the increase in per student funding is due to the change in salaries and benefits paid to teachers. Taking inflation into account, the increase in total funding per student has been 9%. Over the same period, enrolment has increased by only 2%.

A breakdown of the total operating funding per student provided by the Ministry and municipalities along with total enrolment over the last 10 years is presented in **Figure 2**.

For additional information on school board funding, see **Appendix 1**.

## 2.3 Ministry Oversight Practices

The Financial Analysis and Accountability Branch within the Ministry's Education Labour and Finance Division has primary responsibility for overseeing school boards' financial health and their use of GSN funding for operating purposes. This branch employed 35 full-time staff and incurred \$5.6 million in operating costs in fiscal 2016/17. The various oversight practices used by this branch are described in **Appendix 1**.

Other Ministry divisions and related branches that provide EPO grants to school boards through transfer payment agreements are responsible for overseeing that those funds are spent in accordance with those contractual arrangements and the government's Transfer Payment Accountability Directive.

## 2.4 Measuring Student Performance

### 2.4.1 Student Performance Indicators

The main measures used by the Ministry to gauge student performance in school boards include:

- Education Quality and Accountability Office (EQAO) assessments—annual assessments of the reading, writing and math skills of Grade 3 and Grade 6 students; of the math skills students are expected to have learned by the end of Grade 9 (different versions of the test are administered for the academic and the applied math courses); and of the literacy skills of Grade 10 students, assessed through the Ontario Secondary School Literacy Test (OSSLT). There are nine assessments in total administered by an agency of the provincial government.
- Graduation Rate—calculated by the Ministry, this measures the percentage of students who graduate with an Ontario Secondary School Diploma within four years and within five years of starting Grade 9. The first Grade 9 cohort for which the Ministry began to



**Figure 1: Grants for Student Needs Funding, by Category and by Type of Grant, 2016/17**

Source of data: Ministry of Education

General Funding Categories	Grants for Student Needs	Grant Description	# of Grant Components	Funding Allocation for 2016/17 (\$ million)	% by General Funding Category
Funding for Classrooms	Pupil Foundation Grant*	Supports the elements of classroom education common to all students, such as salaries of classroom teachers, early childhood educators, educational assistants, and other teaching staff including librarians and guidance counsellors. It also funds textbooks, classroom supplies and classroom computers.	12	10,587.8	
	Cost Adjustment and Qualifications and Experience Grant	Provides additional funding to boards for classroom staff who, because of their qualifications and experience, have average salaries above the benchmark level provided through the Pupil Foundation Grant.	6	2,019.5	
<b>Total Funding for Classrooms</b>			<b>18</b>	<b>12,607.3</b>	<b>55</b>
Funding for Schools	School Facility Operations and Renewal Grant	Supports the costs of operating (heating, lighting, cleaning), maintaining, and repairing school facilities.	2	2,414.0	
	School Foundation Grant*	Provides funding for principals, vice-principals and office support staff, as well as administrative supplies.	4	1,444.1	
	Geographic Circumstances Grant	Provides funding for the higher costs related to the remoteness of rural boards and schools.	3	190.7	
	Declining Enrolment Adjustment	Recognizes that it takes time for boards to adjust their cost structures to reflect declines in enrolment.	2	18.9	
<b>Total Funding for Schools</b>			<b>11</b>	<b>4,067.7</b>	<b>18</b>



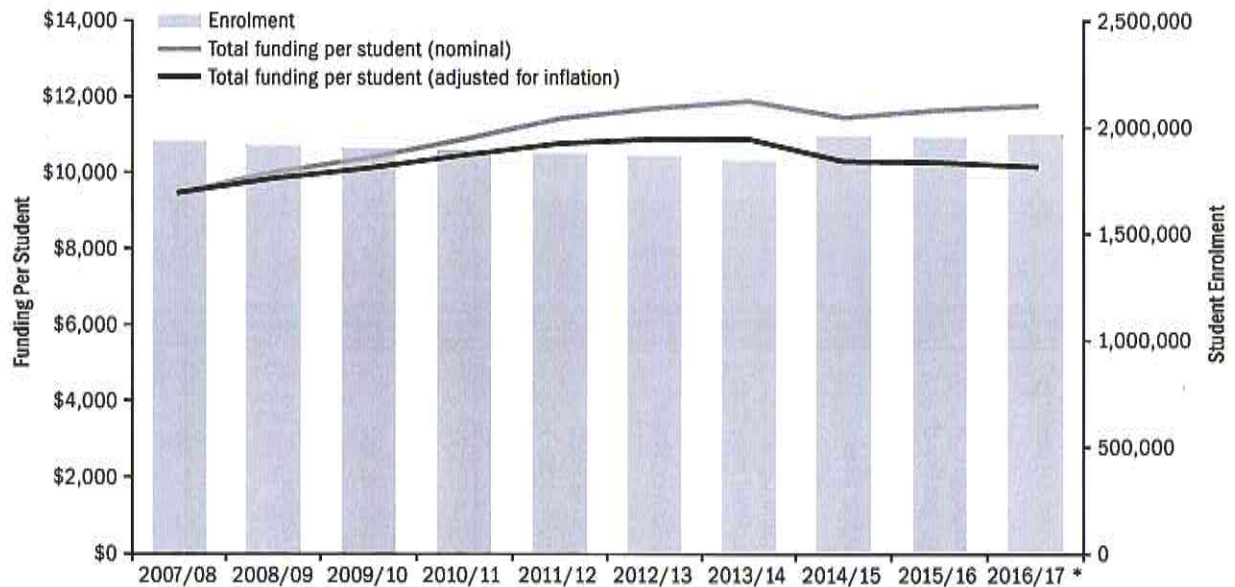
General Funding Categories	Grants for Student Needs	Grant Description	# of Grant Components	Funding Allocation for 2016/17 (\$ million)	% by General Funding Category
Funding for Specific Education Priorities	Special Education Grant	Provides funding for programs, services, and/or equipment for students with special-education needs.	6	2,786.5	
	Language Grant	Provides funding to meet the school boards' cost for language instruction, for example, English as a Second Language and French as a Second Language.	5	714.7	
	Learning Opportunities Grant	Provides funding to help students who are at greater risk of lower academic achievement.	11	531.9	
	Continuing Education and Other Programs Grant	Supports a range of programs aimed at adult learners and day-school students, including secondary students who have completed more than 34 credits and wish to continue their studies.	6	140.7	
	Indigenous Education Grant	Supports programs designed for Indigenous students, such as Native Language and Native Studies.	4	61.4	
	Safe and Accepting Schools Supplement	Funding supports the Safe Schools Strategy and provides targeted support to secondary schools in priority urban neighbourhoods.	2	47.5	
<b>Total Funding for Specific Education Priorities</b>			<b>34</b>	<b>4,282.7</b>	<b>19</b>
Funding for Other Specific Purposes	Student Transportation Grant	Funding to transport students to and from schools.	4	903.6	
	School Board Administration and Governance Grant	Provides funding for board administration and governance costs, including those related to board-based staff and board offices and facilities.	5	594.2	
	Debt Service	Funding to service debt provided to school boards for capital expenditures.	2	477.0	
<b>Total Funding for Other Specific Purposes</b>			<b>11</b>	<b>1,974.8</b>	<b>8</b>
<b>Total</b>			<b>74</b>	<b>22,932.5</b>	<b>100</b>

\* These are classified as Foundation Grants, which are intended to cover the basic costs of education common to all students and schools. All other grants are classified as Special Purpose Grants to address specific needs.



**Figure 2: Student Enrolment and Operating Funding per Student, 2007/08–2016/17**

Source of data: Ministry of Education



Note: Funding includes operating funding provided by the Ministry and municipalities.

\* Funding for 2016/17 based on amount estimated as of December 2016.

track board level graduation rates was the 2008/09 school year, meaning that students would have had to graduate by the end of the 2011/12 and 2012/13 school years to be included in the four-year and five-year graduation rate, respectively. The Ministry has set a provincial target for 85% of students to graduate within five years.

- Credit Accumulation by the end of Grade 10 and by the end of Grade 11—the Ministry measures the percentage of students who successfully complete 16 or more credits by the end of Grade 10 and 23 or more credits by the end of Grade 11. This is an indicator of whether students are on track to graduate with their peers.

## 2.5 Process for School Consolidations or Closures

School boards are responsible for making decisions about closing and consolidating (that is, merging) schools. In cases where a school board requires

capital funding to support the consolidation of schools, it must submit a template business case to the Ministry. The template includes estimated construction costs based on the project scope, historical and one-year forecasted enrolment, the five-year renewal needs for the 10 schools closest to the proposed consolidation, and forecasted enrolment by grade level (primary, junior, high school) for the current situation and under the proposed solution at the expected year of project completion, four years later, and eight years later. School boards may also submit supplementary documents to the Ministry, such as initial and final staff reports, minutes of meetings, and school information profiles. The Ministry reviews the supplementary information provided by boards as part of the project review process.

In March 2015, the Ministry revised its Pupil Accommodation Review Guideline. The guideline, which was last revised in 2009, outlines the minimum requirements, such as timelines, that boards need to follow when consulting with their communities about potential school closures, and



identifies issues that need to be considered as part of the decision-making process.

### 3.0 Audit Objective and Scope

Our objective was to assess whether the Ministry of Education (Ministry) has effective oversight procedures in place to ensure that operating funds provided to school boards are being used by the boards in accordance with legislation, contractual agreements and Ministry policy, and are achieving the desired education outcomes.

Before starting our work, we identified the audit criteria we would use to address our audit objective. These criteria were established based on a review of applicable legislation, policies and procedures, and internal and external studies. Senior management at the Ministry agreed with the suitability of our audit objective and related criteria as listed in **Appendix 3**.

We generally focused on activities of the Ministry in the five-year period ending in 2016/17. We conducted the audit between March 1, 2017, and July 31, 2017, and obtained written representation from the Ministry that effective November 17, 2017, it has provided us with all the information it was aware of that could significantly affect the findings or the conclusion of this report.

We did our work primarily at the Ministry's head office in Toronto. In conducting our audit work, we reviewed applicable legislation, regulations, Ministry policies and relevant files, and interviewed staff of the Ministry. As well, we met with a representative of the Council of Senior Business Officials (an organization comprising all superintendents of business operations at all school boards) to understand issues related to how school boards are funded and how funding is used. We also spoke with the external auditors of select school boards to understand whether procedures are conducted

to substantiate enrolment numbers and Education Property Tax amounts remitted by municipalities.

We researched funding models used in other jurisdictions. As well, we surveyed all 72 school boards to determine amounts spent on special purposes and whether the school boards conduct any procedures to gain assurance over enrolment numbers received from their schools. We received a 46% response rate to our survey.

We also reviewed the Ministry's summary of discussions occurring during the annual funding consultations and written comments submitted by individual stakeholders. We also reviewed the 2002 report of the Education Quality Task Force, entitled, *Investing in Public Education: Advancing the Goal of Continuous Improvement in Student Learning and Achievement*. This was the most recent review undertaken on the funding formula.

In addition, we reviewed the relevant audit reports issued by the Province's Internal Audit Division in determining the scope and extent of our audit work.

This audit on Ministry funding and oversight of school boards complements the audit we conducted on School Boards' Management of Financial and Human Resources in **Chapter 3, Section 3.12**. That report covers areas including school board use of special purpose grants, special-education services, procurement, and employee absenteeism and performance appraisals.

## 4.0 Detailed Audit Observations

### 4.1 Funding Formula May Not Be Meeting the Needs of Students

#### 4.1.1 Comprehensive Review of the Funding Formula Is Overdue

Although the Grants for Student Needs (GSN) funding formula has had some periodic adjustments since it was first introduced in 1998, it is in need of



a comprehensive external review. Without such a review, the Ministry cannot be sure that the funds it is providing school boards are adequately allocated to meet students' needs. Nor can it have assurance that students with similar needs living in different parts of the province will receive the same amount of services and support.

Since the GSN funding formula was introduced in 1998 it underwent one comprehensive external review four years later and none since. The 2002 review, by the Education Equity Funding Task Force, was entitled, *Investing in Public Education: Advancing the Goal of Continuous Improvement in Student Learning and Achievement*. At that time, one of the key recommendations of the review was that:

“... the Ministry of Education in consultation with school boards and other members of the education community, develop mechanisms for annually reviewing and updating benchmarks in the funding formula and for conducting a more comprehensive overall review of the funding formula every five years.”

As will be explained in more detail in Section 4.1.2, the benchmarks are not reviewed and updated annually. Nor has there been a comprehensive overall review every five years. Instead, the original funding formula, already considerably complex when created, has simply been added to when the Ministry identifies new grant categories. Since 2013, the Ministry has undergone an annual consultation process with stakeholders to update the funding formula, but these consultations do not take the place of a fully comprehensive review.

The need for such a review has been echoed by the Minister of Education, think tanks and educators. To illustrate:

- In February 2005, moving for a second reading of the *Education Amendment Act, 2005*, the Minister of Education stated, “We’re working our way toward a very transparent and very accountable funding formula, which we can’t say has existed in the recent past and which will take some time yet to bring about.”

- In 2009, the Canadian Centre for Policy Alternatives issued a report, entitled *No Time for Complacency: Education Funding Reality Check*, which stated, “Ontario needs a permanent, independent third-party commission to provide an ongoing assessment of the appropriate level of funding and programming Ontario requires to meet its educational objectives. A special task force or review every five to 10 years simply isn’t good enough.” The report cited problems with the formula under various categories, including the Ministry’s failure to recognize and reflect differences in needs among students and cost drivers among school boards; and its failure to distinguish appropriately between fixed costs and costs that vary with changes in enrolment.
- In 2016, the Elementary Teachers’ Federation of Ontario issued a news release “urging the... government to make good on its 2010 promise to review the education funding formula.” The primary concerns noted in the news release were that:
  - the number of special-education students identified as requiring individualized plans and support has continued to increase and outpace the grants to support special education. At least 14 public boards are struggling with cuts to special education and some are laying off education assistants, who are crucial in assisting teachers to meet the needs of all students; and
  - 73% of English-language elementary schools now have ESL students compared with 43% in 2002/03, and the number is growing with the arrival of refugees from war-torn nations, such as Syria. Provincial grants for ESL students are inadequate and overall shortfalls in the funding formula have led school boards to use their second language grants for other purposes.
- In a written submission during the 2016/17 education funding consultation process, the Ontario Public School Boards’ Association



noted that it recognizes that in recent years the Ministry has reviewed and updated several components of the funding model, such as board administration funding and special education funding, but continues to advocate for a full review of the current funding model involving consultation with all stakeholders to ensure that the model meets the needs of all students in the province.

As mentioned in Section 2.2.3, over the last 10 years Ministry funding to school boards has increased at a faster rate than the increase in student enrolment. That is, using constant dollars, funding has increased 9% compared to a 2% increase in enrolment. Therefore, it is unclear that the sector is underfunded. However, it is important to evaluate how funds are allocated among school boards.

We asked the Ministry why it has not undertaken a comprehensive external review of the funding formula, including a review of all grants, since 2002, even though its own task force originally recommended reviews every five years. The Ministry told us that the decision to not conduct an extensive review of the funding formula is a policy decision made by Cabinet. Further, the Ministry's view is that "over the years, new reforms have been introduced that better support student achievement and well-being, the implementation of new policies and programs, and updates to the model to better align with board cost structures and drive efficiencies." A review can inform the decision making on how funds are allocated among school boards.

#### 4.1.2 Benchmarks Used in the Funding Formula Often Out of Date

Some cost benchmarks used in the funding formula to determine how much GSN funding each school board receives are often not regularly updated, meaning that school boards may not be receiving the level of funding for particular purposes that was originally intended. Moreover, the Ministry uses out-of-date census data—often more than ten

years old—to calculate significant amounts of funding, even though the relevant demographics may have changed.

In calculating the amount of funding each school board will receive in each of the individual grants and grant components that make up the overall GSN, the Ministry has established cost benchmarks. Benchmarks have two parts: benchmark factors and benchmark costs.

- *Benchmark factors* are the attributes or activities of a school board that trigger costs, such as the intended number of staff per 1,000 students to calculate teacher funding, or the number of eligible pupils who entered Canada in the previous five years, used in the English as a Second Language allocation in the Language Grant. Benchmark factors also take into account regulated standards, such as class size restrictions.
- *Benchmark costs* are the dollar amount assigned to each factor intended to represent a standard or average cost for a particular factor.

As school board costs change over time due to reasons, such as inflation or increases in the costs of goods and services beyond inflation, benchmark factors and costs may not reflect current circumstances unless they are regularly updated to reflect changes in the actual cost of goods and services.

All benchmarks associated with negotiated labour costs are updated regularly as part of contractual negotiations; however, many others based on socio-economic and demographic factors are not regularly updated. For example, we noted that the benchmark for computer hardware, which forms part of the Pupil Foundation Grant, has not been updated since 2009/10, at which time it was reduced from \$46.46 to \$34.52 per elementary pupil and from \$60.60 to \$45.03 per secondary pupil.



### Ministry Using Census Data from 2006 to Assess School Boards' Needs in 2016/17

We also found that in allocating funding for special purpose grants, the Ministry is using census data from Statistics Canada that is more than 10 years old. Given that demographics in Ontario may have significantly changed since 2006, using this data may not fairly and equitably reflect how funding should be distributed so that students who need it most are receiving it.

Census data from Statistics Canada was used in 2016/17 to allocate \$1.146 billion for portions of special purpose grants that are intended to help close the achievement gaps for specific groups of students; these included portions of the Special Education Grant, Language Grant, Indigenous Education Grant, Learning Opportunities Grant, the Safe and Accepting School Supplement, and the Geographic Circumstances Grant.

The Ministry uses census data to estimate the relative need among boards, in order to distribute the funding to school boards that need it most. In 2016/17, only 7%, or \$83.3 million, of the special purpose grant funding that is determined using census data was based on information provided through the 2011 Census—the latest information available at the time the allocations were determined. A further 10%, or \$111.7 million, is being phased in by 2018/19 using 2011 census data. The remaining 83%, or \$951 million, was determined using 2006 census data, despite more current data being available.

Census data is collected every five years by Statistics Canada. In 2011, Statistics Canada information that was previously collected by the mandatory long-form census questionnaire was collected as part of a voluntary National Household Survey (NHS). The Ministry told us that it did not use the more up-to-date 2011 census data because the move to a voluntary survey raised concerns with data quality.

However, despite this explanation, five years after the 2011 Census was taken, the Ministry began using the 2011 census data to calculate cer-

tain allocations under the Special Education Grant, the Indigenous Grant and the Language Grant for the 2016/17 GSN allocation. Changes resulting from the use of the 2011 census data are being phased in over three years to minimize fluctuations in funding.

Statistics Canada returned to using the mandatory long-form census in 2016; results are being released throughout 2017. This will provide the Ministry an opportunity to use even more current census data.

## RECOMMENDATION 1

To ensure that funds are allocated in a manner that supports school boards in providing a high standard of education to all students, we recommend the Ministry of Education:

- conduct a comprehensive external review of the funding formula, including all grant components and benchmarks, as recommended by the Education Equity Funding Task Force in 2002;
- regularly review the formula and update all benchmarks to reflect the province's changing demographics and socio-economic conditions; and
- use the more current census data available when determining allocations for grants.

## MINISTRY RESPONSE

Several new committees are planned for this school year to discuss various parts of the Grants for Student Needs (GSN) in addition to the annual engagements currently under way.

The Ministry also agrees to regularly review Statistics Canada data to ensure any appropriate updates are reflected in the allocations associated with socio-economic and demographic factors, as well as engage in targeted external reviews of the factors that determine key inputs of the funding formula as needed.

Reforms have been made in the past to the GSN funding formula. Some of these



changes include the introduction of full-day kindergarten into the Pupil Foundation Grant; adjustments to a number of grants to reflect the School Board Efficiencies and Modernization initiative; a revised School Board Administration and Governance Grant; a new funding model within the Special Education Grant; the creation of a Student Achievement envelope in the Learning Opportunities Grant; and the introduction of the 34<sup>th</sup> Credit Threshold into the Continuing Education and Other Programs Grant.

In total, 87% of the grants in the GSN have been reformed since 2012/13, to varying degrees of significance.

#### 4.1.3 Grants for Specific Education Priorities Not Always Allocated According to Actual Student Needs

We reviewed the Ministry's GSN funding formula to determine whether the basis of particular grant components was reasonable, given the objectives of providing the funding or the specific group of students the funding was intended to serve. We found that some grants are allocated in ways that do not reflect the number of students per school board that have the particular need the grant is intended to address.

Allocation of the Special Education Grant, for example, is heavily weighted toward total student enrolment, resulting in boards receiving more or less than they would have if the Ministry allocated funding according to the actual number of students receiving special-education services. Allocation of the Learning Opportunities Grant is heavily weighted on 2006 socio-economic data rather than numbers of students actually at greater risk of poor academic achievement.

##### Special Education Grant

The Special Education Grant is intended for students who need special-education programs and

services. However, we found that half of special-education funding is allocated based on a school board's average daily enrolment of all its students, as opposed to only the number of students who are receiving special-education programs and services. Under the current allocation method, boards that have a high number of students who need these programs and services but lower total enrolment levels compared with other boards would be penalized, while boards that have a low number of students that receive these services but high total enrolment would get more funding than they do not necessarily need.

Many school boards that participated in the 2016/17 annual education funding consultation also felt that using a board's total enrolment might not be the best approach to allocate special-education funding because, they noted, special-education needs are generally growing faster than total enrolment. We found this to be the case: over the 10-year period ending 2015/16, total student enrolment decreased 5% provincially while special-education enrolment increased by 21%.

For the portion of funding based on total enrolment, we calculated the amount each board would have received if it was funded instead on the actual number of special-education students it reported, and compared this amount with the funding provided by the Ministry. We found that if the Ministry had allocated the funding based on the actual number of students receiving special-education programs or services, \$111 million would have been allocated differently across the boards. Based on our calculation, 39 boards would have received an average of \$2.9 million more in funding, and 33 boards would have received an average of \$3.4 million less. One board would have received \$10.4 million more, while another board would have received \$16.1 million less.

##### The Learning Opportunities Grant

The Learning Opportunities Grant (LOG) provides school boards funding for a range of programs intended to help students who are at greater risk of



poor academic achievement. Although the grant is intended to help students who have a higher risk of academic difficulty, we found that it is not allocated to school boards based on the actual number of students at risk. Instead, the majority of funding is based primarily on 2006 socio-economic census data identifying numbers of students who come from low-income households, have recently immigrated to Canada, have a single parent, or whose parents have less than a high school diploma. The Ministry recognizes that the total number of students predicted by the census data to be at risk will not all require additional resources.

The Ministry does not have a standard definition for “risk,” leaving this to the school boards to determine. Risk could be based on a number of academic, social or emotional factors, or a combination of these. Determining which students are at risk is based on the professional judgment of schools’ student success teams; some students are deemed to be at risk only for a relatively short period of time, while others may have several risk factors and remain at risk for longer periods.

The Ministry does have data on secondary school students considered at risk of poor academic achievement because school boards report this information to the Ministry three times each year. However, the Ministry told us it does not use this data to allocate the LOG funding to school boards because the criteria for determining students at risk varies from school board to school board, and could even be different from school to school.

In our 2011 audit of student success initiatives, we recommended that the Ministry and the school boards establish a common definition for reporting Grade 9 and Grade 10 students considered at risk of not graduating. At the time of our follow-up of the recommendations from this audit, the Ministry had updated its guidelines to provide more consistency in identifying students at risk, but had not set a common definition.

Going back fifteen years, in its 2002 report, the independent task force that reviewed the funding formula recommended:

- The Ministry should review the current allocation model for the demographic component of the LOG to ensure that the distribution of the funds is fair and equitable; and
- The Ministry require school boards that receive funds through the LOG to report publicly on how the expenditures of these funds is contributing to continuous improvement in student achievement and to the reduction of the performance gap between high and low achievers in their schools, while maintaining high standards.

At the time of our audit, the Ministry had taken little action to address these recommendations.

As recently as the 2016/17 annual education funding consultations with school boards and other stakeholders, the Ministry asked for suggestions on sources of data that could be used to allocate the LOG. Stakeholders suggested additional types of data to help identify need and to determine where more resources are needed. Suggestions included local health and mental health information, such as birth rates, teenage pregnancies, drug use, addiction, student and parent mental health, access to urgent care, Children’s Aid Society referrals, and data used by police.

Stakeholders also noted that the existing funding formula has a 25% weighting factor for students who recently immigrated to Canada. There were concerns that those students, while they may need language resources, are actually highly motivated to perform well. Conversely, northern boards typically have fewer immigrants but do have many Indigenous students, who are often high-risk.

In 2014/15, the Ministry announced its intention to review the LOG in order to determine whether stronger accountability mechanisms are required to ensure that funding is meeting provincial policy objectives. At the time of our audit, the Ministry could not demonstrate to us that it had undertaken any significant work in this area.

Without incorporating into the allocations the type of information suggested during the consultations, or by not basing funding on the actual



number of students identified as being at risk, it is difficult to determine whether the funding provided to school boards is in fact providing the appropriate level of support to students across the province who are actually at risk, and meeting one of the primary objectives of the funding formula—that it is equitable.

### RECOMMENDATION 2

In order to provide funding in a more equitable manner and ensure the funding meets the actual needs it is intended to address, we recommend the Ministry of Education assess whether the funding of grants intended to serve the needs of a specific group of students or for a specific purpose is achieving that purpose.

### MINISTRY RESPONSE

The Ministry will continue to assess the design of the grants in relation to their purpose, and make improvements as appropriate. In the funding engagements to inform the 2018/19 school year, the Ministry is seeking feedback on a range of programs to help students who are at a greater risk of poor academic achievement to ensure funding is responsive to school boards' needs.

The Ministry continues to review and refine the Special Education Grant. The Ministry has introduced a revised need-based component that was fully implemented in 2017/18. This component is derived in part from board-reported data, and addresses a board's likelihood of having students with special education needs, and ability to meet those needs.

## 4.2 Ministry Does Not Ensure Funding for Specific Education Priorities Is Spent as Intended

When the Ministry provides funding to school boards for specific purposes, it does not ensure that the total amount is actually spent as intended. There are two reasons for this.

First, the Ministry gives school boards considerable discretion in how they spend the funding they receive following the principle that school boards are each governed by an elected board of trustees to make autonomous decisions based on local needs and priorities.

Second, the Ministry requires school boards to report back on their spending in a way that does not match up with how the Ministry allocated the funding, thus making it impossible for the Ministry to know how much money was spent for the intended purposes. We further found that the Ministry does not validate or audit the amount of expenses reported for restricted purposes by school boards to verify their accuracy.

### 4.2.1 Only 35% of Total \$10.9 Billion in 2016/17 Special Purpose Grants Must Be Spent on Specified Purposes

In 2016/17, \$10.9 billion—almost half of the funding provided to school boards through the GSN—is categorized as being for Special Purpose Grants. However, the majority of grants allocated for a specific purpose or a specific group of students is being used at the discretion of school boards, creating a potential disconnect between the Ministry's stated purposes for providing the funding and how school boards choose to spend it. **Appendix 2** highlights amounts for which funding is restricted under each grant.

About 20% (\$2.2 billion) of the Special Purpose Grants can be considered top-ups to the foundation grants because they are intended to recognize the additional costs or pressures facing school boards. These include:

- Geographic Circumstances Grant—helps cover the costs of operating small schools in remote areas;
- Declining Enrolment Grant—relieves pressure of adjusting to reduced allocations where enrolment is declining; and
- Teacher Qualification and Experience Grant—addresses situations where the cost of



teachers' salaries is higher than the average amount provided to school boards through the Pupil Foundation Grant.

However, the remaining 80% (or \$8.7 billion) of the special purpose grant funding is allocated based on a specific purpose (for example, student transportation) or for a specific group of students (for example, students with special needs). But not all this special purpose funding is restricted. That is, although the allocations are described as being for specific purposes or groups of students, the Ministry allows school boards to spend the money as they choose.

Only one grant, the Special Education Grant, is restricted in its entirety under legislation. In other words, school boards are required to spend allocations received under this grant only for purposes specific to special education.

Some special purpose grants have partial restrictions in that some individual components are restricted while others are not. For example, 34% of the Learning Opportunity Grant and 19% of the grant for Indigenous Education must be spent for purposes related to those grants while the remainder of the allocations can be spent for any purpose the school board chooses.

For many of the special purpose grants, no restrictions at all are placed on how school boards spend the funding. It is entirely at the school boards' discretion how they spend their allocations under, for example, the Language Grant (intended for English- and French-language learners), the Student Transportation Grant, and the Continuing Education and Other Programs Grant, which is designed to support programs aimed at adult learners.

The Ministry told us that this is acceptable because it is the responsibility of school boards to allocate these funds for staffing and program delivery according to their local policies while respecting the Act and any relevant regulations and policies. The Ministry indicated that school boards' accountability to it must be balanced against the need for flexibility to address local conditions.

Our concern, however, is that this can lead to inequity in services provided to students depending on where they live in the province. For example, a student requiring ESL support attending a school in one district might receive less support than a student with the same needs living in a different district simply because his or her school board has chosen to allocate some of its Language Grant allocation for other purposes. We further discuss the inequity in ESL funding in our report on School Boards' Management of Financial and Human Resources in **Chapter 3, Section 3.12**.

#### 4.2.2 School Boards' Reporting of Spending of Special Purpose Grants Does Not Allow the Ministry to Assess Reasonableness of Allocations

The Ministry cannot track whether school boards have spent funds from special purpose grants according to the intended purpose of these grants (with the exception of amounts restricted in use) because it requires the school boards to report on their expenses using categories that do not match the original allocations. Rather than report expenses back to the Ministry in the same manner in which they were allocated, school boards are required to report all expenses to the Ministry under five main expense headings: instruction, administration, pupil transportation, pupil accommodation, and "other."

This means that where funding was provided for a specific purpose, such as to support ESL students or Indigenous students, its use is reported back to the Ministry split between the defined categories noted above rather than for the purpose for which it was provided.

Further, in reporting expenses to the Ministry, school boards report the total amount of expense incurred in each of the defined categories from all sources of funding, not only what was provided by the Ministry. The amounts reported by the school boards also include amortization of past expenses, as required by accounting standards. The combined



effect is that the expense per student (as discussed in Section 4.3) is much higher than the amount of funding allocated per student (as noted in Section 2.2.3).

The Ministry informed us that requiring school boards to report expenditures based on the source of funding would not be practical. However, requiring reporting in the way it does prevents the Ministry from understanding whether its funding allocations, particularly special purpose grants, reflect the actual spending needs of school boards or whether boards have different priorities in spending these funds.

The exception to this is funding for special education and other restricted funds, where school boards are required to report their actual expenses to the Ministry. However, even in the case of restricted funds, the Ministry does not compare the funding allocated for these restricted amounts to expenses reported by school boards to determine the reasonableness of the funding provided.

We compared school boards' actual expenditures submitted to the Ministry to allocated funding for the 2015/16 school year for all restricted operating grants and found that, for many of these grants, there was a substantial difference between what boards were allocated and what they actually

spent. See Figure 3 for percentages of boards that spent at least \$100,000 more or less than allocated for restricted funds. The more significant differences included:

- Almost 80% of school boards spent at least \$100,000 more than was allocated to them by the Ministry for special education, ranging from \$108,000 to \$81 million for those boards that overspent. Of those boards, nine overspent by at least \$5 million. Fourteen percent of school boards spent at least \$100,000 more than provided on special equipment for students with special education needs. Three of these boards overspent by more than \$500,000. The amount for special equipment is a restricted component within the Special Education Grant. Although boards can carry forward unspent amounts to future years, we noted that 59% of the boards that spent more than allocated in 2015/16 also spent more than allocated in the prior year.
- About three-quarters of school boards spent at least \$100,000 less than the Ministry allocated to them through the School Renewal Allocation, ranging from \$105,000 to \$13.9 million less than allocated. Two boards spent at least \$10 million less than what they

**Figure 3: Percentage of Boards that Spent at Least \$100,000 More or Less than Amount Allocated for Restricted Funds, 2015/16**

Source of data: Ministry of Education

Restricted Funding	Total Restricted Amount Allocated for 2015/16 (\$ million)	Boards that Spent More than Allocated Amount by \$100,000 or More			Boards that Spent Less than Allocated Amount by \$100,000 or More <sup>1</sup>		
		#	(%)	Range (\$)	#	(%)	Range (\$)
Special Education	2,642	57	79	108,000–81 million	3	4	146,000–873,500
Special Education Equipment	71	10	14	125,600–1.5 million	23	32	100,700–2.1 million
School Renewal	365	13	18	172,800–1.1 million	53	74	105,000–13.9 million
Programs for Students at Risk <sup>2</sup>	141	13	18	125,900–614,000	5	7	113,700–1.1 million

1. School boards are required to spend the funding for the restricted purpose in future years.

2. Relates to a portion of funding restricted under the Learning Opportunities Grant for six specific programs to help students who are at greater risk of poor academic achievement.



were allocated. This allocation supports the costs of repairing school facilities. According to the Ministry, the reason a large number of school boards underspent this funding was because the Ministry allocated an additional \$40 million for school repairs and maintenance to school boards as the end of the school year approached. However, even without this additional funding at year end, school boards would still have spent \$43 million less than what they were allocated in this area. We would expect school boards to be spending all of this funding, as the latest assessment of the physical conditions of schools in the province identified \$15.2 billion in needed repairs by 2020.

- Eighteen percent of school boards spent at least \$100,000 more than they were allocated in the restricted portion of the Learning Opportunities Grant (LOG), while 7% spent at least \$100,000 less. However, when we surveyed school boards on their use of the entire amount of funding provided through the LOG, of which two-thirds is unrestricted, 71% of respondents told us that they spent at least 10% less than they were allocated for students at risk of poor academic achievement.

The Ministry does not follow up with school boards to determine why variances exist. Such significant discrepancies between the Ministry's assessment of the school boards' needs—as determined under the funding formula—and the school boards' actual expenditures are a further indicator of the need for a comprehensive review by the Ministry of its funding formula.

#### 4.2.3 Ministry Not Validating Reported Expenses for Restricted Purposes

For some restricted grants, the Ministry requires the school boards to report considerably detailed financial information, yet it does not validate or audit these expenses to verify the accuracy of the amounts reported for the restricted purpose or that

they were used for the restricted purpose for which they were intended.

The Program Implementation Branch, for example, receives information on the funding allocated for the Specialist High Skills Major program—a restricted fund under the Learning Opportunities Grant—by requiring boards to report financial information to the Ministry three times a year. Boards must submit an initial report in November that outlines the proposed expenses, an interim report in February of the actual expenses incurred during the first semester, and a final report in July of the actual total expenses according to six specific categories, such as capital equipment, teacher training and partnership development.

Nevertheless, we confirmed with the Ministry division that oversees all financial reporting, as well as individual program areas, that it does not validate or audit these expenses to verify that they were used for the restricted purpose for which they were intended.

Some funding is based on claims submitted by school boards. Such is the case for funding to purchase special-education equipment, such as hearing and vision support equipment, personal care support equipment and sensory support equipment. Funding for special-education equipment (both claims based and formula based) amounted to \$104.4 million in 2016/17. We noted that the Ministry reviews the listing of claims submitted by school boards to determine whether the claims reflect allowable items, but it does not verify the existence and/or use of the equipment. According to Ministry guidelines for such claims, the Ministry may review documentation and conduct classroom, school or board visits to verify the existence and use of the equipment. We confirmed with Ministry staff that they had not conducted any of these verification procedures for at least the last five years.

Further, although school boards submit audited financial statements each year to the Ministry, the Ministry cannot obtain assurance that school boards used restricted funds for the required purposes. This is because these financial



statements are not prepared using fund accounting (that is, grouping expenses by distinct function or purpose), and do not include a more detailed breakdown of expense information in a note to the financial statements.

### RECOMMENDATION 3

In order for the Ministry of Education to provide funding in proportion to a school board's need, we recommend it:

- determine to what extent school boards are spending funds for specific education priorities (such as supports for ESL students and Indigenous students) on those specific purposes, and where it finds significant discrepancies, follow up with school boards to understand the reason for the discrepancies and better align funding with actual needs; and
- design and conduct validation procedures to verify the use of restricted funds.

### MINISTRY RESPONSE

The Ministry agrees some funds should be restricted for specific purposes, and agrees it should continue to review and assess whether these grants meet the needs of students. Students, schools and school boards across the province are not uniform. Each has unique circumstances, different geography, unique student compositions and needs and different local policies and priorities.

The Ministry will continue to assess and review the need for validation procedures to ensure the use of funds, reporting and procedures of school boards is reasonable.

#### 4.2.4 High Administration Costs Required to Review a Small Portion of School Board Funding

The Ministry devotes twice as many resources to administer less than 1% of its total funding allo-

cated to school boards than it does to administer the remaining 99%.

Ministry funding for Education Programs—Other (EPO) grants is made through transfer payments; school boards receiving this funding are to abide by the requirements set out in the relevant transfer payment agreement. This generally includes providing the responsible Ministry branch with an expenditure report and reporting regarding the use of funds.

For operational funding, the Grants for Student Needs (GSN) is administered by one branch, whereas EPO funding is administered by 14 branches. The Ministry estimated that 8.9 full-time equivalent (FTE) staff are required to administer the GSN, whereas 17.9 FTE staff are required to administer EPO transfer payments. Therefore, about twice the amount of resources are used to administer EPO transfer payments than GSN funding, yet in 2015/16, EPO grants accounted for less than 1% of total Ministry funding allocated to school boards.

Further, the Ministry identified issues with administering EPO grants in its business plan for transforming the management of EPO grants. Specifically, the Ministry noted that the various branches or divisions that oversee individual transfer payment programs do not always co-ordinate with each other, resulting in different branches requesting the same or similar data from school boards when they are following up on incomplete information received. This wastes administrative time at the school boards and creates duplicated efforts at the Ministry.

In November 2015, the Ministry began a multi-year project to transform the financial administration, contract management, and reporting process for transfer payments through EPO grants. By 2019—within four years of the start of the project—the Ministry expects to establish a single process for administering all EPO grants, including integrating reports coming back to the Ministry's various branches from school boards, contract management and funding management.



#### 4.2.5 Ministry Funding through Transfer-Payment Agreements Not Temporary as Intended

According to the Ministry, the reason it provides some funding to school boards through transfer payment agreements (EPO funding) is to allow for targeted investments and flexibility in implementing new or time-limited programs and initiatives, or initiatives announced mid-year. Funding in this way allows the Ministry to pilot a program or provide temporary funding for initiatives without the need to adjust legislation, since the GSN is established by legislation annually.

However, we noted many instances in which EPO grant programs had been funded through transfer payments over a long term. We found that, during the seven-year period from 2009/10 to 2015/16, which is as far back as the Ministry had available data, the same 18 EPO grant programs had been funded through transfer payments for the entire period. Total funding for these grants over the seven years amounted to \$483 million. Examples of EPO grant programs that have been in place for at least seven years include:

- Autism Supports and Training—all boards receive funding to support training on Applied Behaviour Analysis instructional methods, for teachers and other educators working with students with Autism Spectrum Disorder; and
- School Support Initiative—focuses on building principals' leadership capacity.

There is no clear reason why programs such as these should be funded through transfer payments year after year rather than being incorporated into the GSN, given that funding through transfer payments is significantly more expensive to administer than funding through the GSN.

#### RECOMMENDATION 4

To reduce the overall administrative burden on both the Ministry of Education (Ministry) and school boards, we recommend that the Ministry:

- regularly review grant programs funded under Education Program—Other (EPO), and where program funding is expected to continue beyond the short term, incorporate the funding into the Grants for Student Needs; and
- complete the project to transform the financial administration, contract management, and reporting process for funding considered necessary by way of transfer payments through EPO grants.

#### MINISTRY RESPONSE

The Ministry will continue to evaluate opportunities to streamline and strategically bundle additional EPO programs into the GSN.

The Ministry recognizes the value in continuing to improve the EPO transfer payment management process and increase program efficiency and effectiveness. The Ministry has undertaken, and will continue to evolve, various EPO improvement initiatives to enhance accountability while minimizing administrative burdens for school boards and the Ministry.

#### 4.3 Ministry Does Not Know Whether Additional Funding for Some Students Is Achieving Intended Results

Although the Ministry allocated significantly more money per student to some school boards rather than others, it does not know whether this additional funding is achieving the intended results as described in Figure 1 for each of the Grants for Student Needs.

In the 2015/16 school year, the provincial cost per student was \$12,500. This varied from a low of \$11,100 per student at a mainly urban school board primarily serving a densely populated area, to \$27,800 per student at a school board in Northern Ontario.



The Ministry has no way of knowing how and to what extent the higher funding it provides to serve the needs of students facing challenging learning conditions has benefited them. We do know that overall academic achievement in rural Northern Ontario is lower than elsewhere in the province, even though expenditures are highest there. Given this, we would expect the Ministry to analyze what impact those grants designed to level the playing field are actually having on student success, and to use that information to make the grants more effective.

### 4.3.1 Trend in Students' Performance Results is Positive, with Exception of Mathematics

In the five years ending 2015/16, the trend in performance results for student achievement has generally been positive, except in the areas of mathematics and Grade 3 writing, as shown in Figure 4.

We reviewed past math EQAO results to determine how long students have been performing below the provincial standard. We noted that students have been performing below the standard in Grades 3 and 6 math and Grade 9 applied math since at least 2008/09 (see Figure 5). However, the Ministry has not acted quickly enough to bring

**Figure 4: Student Achievement Results for All Students for Five Years, 2011/12–2015/16**

Source of data: Ministry of Education, and the Education Quality and Accountability Office (EQAO)

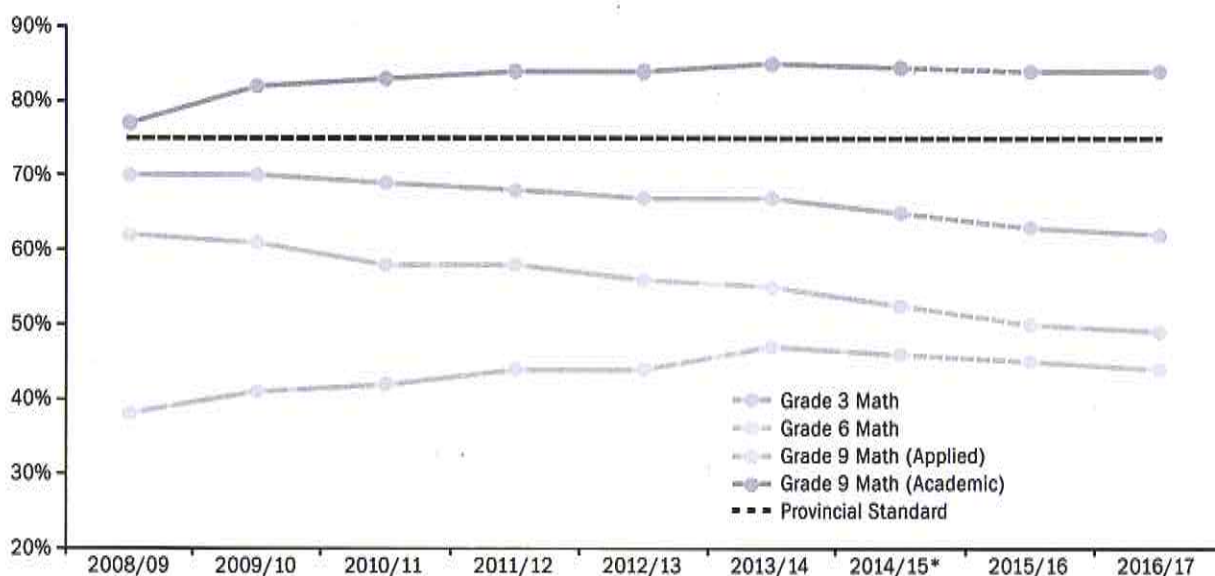
	Student Achievement Results (%)						Change over Five Years
Performance Indicator	Target	2011/12	2012/13	2013/14	2014/15¹	2015/16	
EQAO Results²							
Grade 3 Reading	75	66	68	70	n/a	72	6
Grade 3 Writing	75	76	77	78	n/a	74	(2)
Grade 3 Math	75	68	67	67	n/a	63	(5)
Grade 6 Reading	75	75	77	79	n/a	81	6
Grade 6 Writing	75	74	76	78	n/a	80	6
Grade 6 Math	75	58	57	54	n/a	50	(8)
Grade 9 Academic Math	75	84	84	85	n/a	83	(1)
Grade 9 Applied Math	75	44	44	47	n/a	45	1
Ontario Secondary School Literacy Test³	75	76	76	77	77	76	0
Graduation Rate⁴							
4-Year	n/a	75	76	78	80	n/a	n/a
5-Year	85	n/a	83	84	86	86	n/a
Credit Accumulation⁵							
Grade 10	n/a	76	78	78	79	79	3
Grade 11	n/a	78	80	81	81	82	4

1. Due to labour negotiations taking place during the 2014/15 school year, English public school boards did not participate in the EQAO testing; therefore, provincial data for 2014/2015 is unavailable.
2. EQAO results measure percentage of students to achieve a level 3 or 4—equivalent to a B grade or better.
3. OSSLT results for students to achieve provincial standard have been combined for first-time eligible and previously eligible writers.
4. Graduation rates are based on the rates of the four cohorts of students to begin Grade 9 from 2008/09 to 2011/12, graduating between 2011/12 and 2014/15 for the four-year rate and 2012/13 and 2015/16 for the five-year rate.
5. Percentage of students who successfully complete 16 or more credits by the end of Grade 10 and 23 or more credits by the end of Grade 11.



Figure 5: EQAO Math Results, 2008/09–2016/17

Source of data: Education Quality and Accountability Office (EQAO)



\* No EQAO testing was performed in 2014/15.

about improvement in math results. In fact, the elementary level math results have gotten worse.

To address the performance results in math, the Ministry informed us that in November 2014, it endeavoured to understand the root cause of the issue by inviting over 100 people representing stakeholders, such as academics, curriculum leads, directors of education, school administrators and teachers, to submit hypotheses with supporting evidence of the causes contributing to the decline in math achievement. The Ministry informed us it received 44 submissions in response to the invitation.

The main root causes brought forward through the submissions included the need for educators to increase their knowledge of the mathematics curriculum, related pedagogy (effective teaching strategies), and effective assessment and evaluation practices.

This process led to the development of the Ministry's 2015 Mathematics Action Plan, which outlines strategies around seven key principles: a school board focus on mathematics; co-ordination

and strengthening of math leadership; building an understanding of effective math instruction; supporting collaborative professional learning in math; designing a responsive math learning environment; providing assessment and evaluation in math that supports student learning; and facilitating access to math learning resources.

Starting in September 2016, the Ministry announced \$60 million to help support students achieve better results in math. Key elements of the strategy include:

- 60 minutes each day dedicated to teaching math in Grades 1 to 8;
- up to three math lead teachers in all elementary schools;
- coaching for principals of select secondary schools to lead improvement;
- support for learning at home through parent resources;
- better access to online math resources and supports;
- math support for Grades 6 to 9 outside of the school day; and



- opportunities for educators to deepen their knowledge, including a dedicated math Professional Development Day.

Further to this issue, we noted that elementary schools have single-subject teachers for certain subjects, including French, physical education and music, but generally not mathematics. A teacher who is specialized in mathematics should be knowledgeable on the curriculum and on effective teaching strategies.

### RECOMMENDATION 5

In order to improve students' performance in mathematics, we recommend that the Ministry of Education:

- assess the effectiveness of its 2016 math strategy and take corrective action where little or no improvement is noted; and
- assess the costs and educational benefits of having elementary school students taught mathematics by a teacher with math qualifications.

### MINISTRY RESPONSE

The Ministry has contracted with external consultants to evaluate the design, implementation, process and impact of the Renewed Mathematics Strategy.

The Ministry is committed to continuing to assess the costs and educational benefits of having elementary students taught mathematics by a teacher with math qualifications.

In Ontario, educators have the opportunity to obtain Additional Qualifications (in mathematics and in other subjects). Since spring 2014, approximately 9,000 teachers and other school staff have received a subsidy from the Ministry for successfully completing a Math Additional Qualification, Math Additional Basic Qualification or pre-requisite undergraduate course. The Renewed Mathematics Strategy, which launched in fall 2016, provided newly designed subsidies that had also been provided

to principals and vice-principals for successfully completing a Math Additional Qualification course alongside teachers from their school as a team.

### 4.3.2 Ministry Does Not Analyze Expense Variations or Unit Costs between School Boards

The Ministry does not compare and analyze expenditures of school boards on a per-unit basis, such as per student or per school, as appropriate. Doing so would aid it in understanding where school boards are feeling financial pressures and areas where the funding, as calculated by the formula, does not meet the needs of school boards.

The Ministry does prepare a summary on each school board that includes information such as trends in student achievement results (e.g., EQAO results), class size, staffing, in-year surplus/deficit and accumulated surplus. In addition, the document summarizes the variance between the number of teachers the Ministry funds and the actual number of teachers the school board employs. It also summarizes historical spending trends in the areas of classroom teachers, supply teachers, textbooks and supplies. In some cases, information is compared with a provincial average, but the Ministry does not compare one board with another—even if boards share similar attributes, such as operating in the same geographic area (e.g., a public and a Catholic board serving the same district), or serving the same type of demographics (e.g., boards serving primarily rural areas). The Ministry informed us that these individual board summaries are prepared to provide a snapshot of the financial situation for each school board.

Ministry senior management stated that comparing the cost per student ignores factors that affect both how a board must structure its costs and the performance of students. This includes demographic and geographic circumstances, such as being in a more remote area or in a large urban centre, and the negotiated teacher salaries between individual boards and regions.



The Ministry also noted that regional circumstances and socio-economic factors affect student performance and the spending of individual school boards reflects this. For example, the EQAO measures the quality of the delivery of the curriculum, but spending is also necessary for student well-being and other much broader outcomes. However, the funding formula allocates grants that are intended to address these factors.

When we analyzed school boards' expenses for the 2015/16 school year, we noted that the total cost per student was 5% higher on average for Catholic boards compared with public boards, and 35% higher on average for French-language boards compared with English-language boards.

According to the Ministry, French-language school boards have higher costs because they typically cover a larger geographic area (that is, 12 French-language school boards cover the same geographic area as 60 English-language school boards) and have fewer schools in each board. This difference will increase in 2017/18, as the Ministry adjusted the funding formula to provide more funding to French-language boards through the school foundation grant.

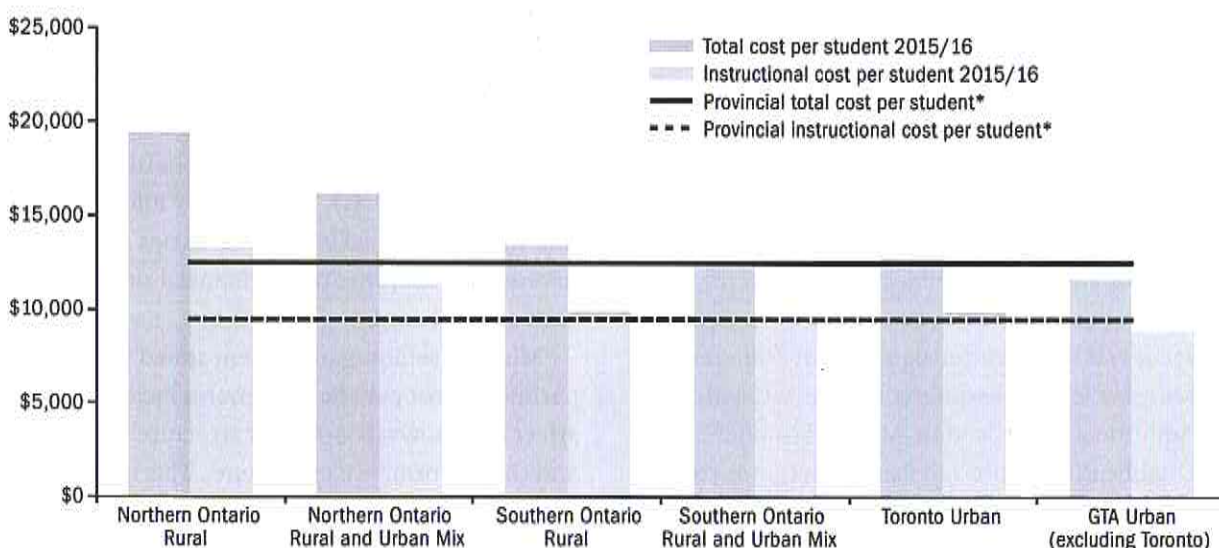
The variations in unit cost were more evident when compared regionally. For example, the five-year (2011/12 to 2015/16) average total expenses per student ranged from about \$11,400 in the Greater Toronto Area, excluding Toronto, to about \$19,500 in rural Northern Ontario. We also analyzed instructional costs separate from administrative and transportation costs—given that northern rural areas may have higher administrative and transportation costs—but found that similar regional variations existed. Refer to Figure 6 for the 2015/16 average expenses per student by region.

We looked at the five-year average unit costs in the Ministry's five overarching expense categories—instruction, administration, transportation, pupil accommodation, and other—and noted that northern regions had the highest per-unit costs in all expense categories except accommodation, as illustrated in Figure 7.

However, when we analyzed the five-year average costs in the five expense categories of boards within each region, we noted significant variances in the per-pupil or per-school cost between boards even when in the same region of the province (see Figure 8).

**Figure 6: Regional Average Cost per Student to School Boards, 2015/16**

Source of data: Ministry of Education



\* The difference between these two costs per student are the costs for accommodation, administration, transportation and other.



**Figure 7: Five-Year Average Per-Unit Costs to School Boards by Region, 2011/12–2015/16**

Source of data: Ministry of Education; calculated by Office of the Auditor General of Ontario

	Administration Costs per School (\$)	Accommodation Costs per School (\$)	Instruction Costs per Student (\$)	Transportation Costs per Student (\$)	Other Costs per Student (\$)	Total Costs per Student (\$)
Northern Ontario rural	143,095	479,729	12,899	983	756	18,638
Northern Ontario rural/ urban mix	123,428	534,555	11,049	1,003	480	15,688
Southern Ontario rural	101,910	492,654	9,669	935	442	13,285
Southern Ontario rural/ urban mix	120,412	660,186	9,136	527	393	12,142
Toronto urban	136,313	746,602	9,700	254	419	12,563
GTA urban excluding Toronto	157,576	997,018	8,610	312	292	11,270
<b>Province-Wide</b>	<b>129,868</b>	<b>714,302</b>	<b>9,229</b>	<b>467</b>	<b>377</b>	<b>12,245</b>

Although many of these cost drivers likely are associated with differences due to geography and negotiated collective bargaining agreements, completing this type of analysis by regional unit costs and following up with the boards on the variances would allow the Ministry to understand where the funding formula may need to accommodate for various financial pressures and where savings could be found.

#### Correlation between Instructional Spending and Student Performance

We compared average five-year spending for classroom instruction with average performance results for the same five-year period (2011/12 to 2015/16) by board, to determine whether there is a correlation between instructional spending and student performance. We considered the following indicators for student performance: Grades 3 and 6 EQAO assessments in reading, writing, and math; Grade 9 EQAO assessments in academic and applied math; combined results of first-time and previously eligible writers of the Ontario Secondary School Literacy Test (OSSLT); credit accumulation by end of Grade 10; and the four-year graduation rate (results only available for 2011/12 to 2014/15).

The provincial target set by the Ministry for EQAO is that 75% of students will achieve a level three or four (equivalent to a B grade or better). The Ministry has not set a target for the Grade 10 credit accumulation indicator or the four-year graduation rate. Therefore, to be consistent with the target for EQAO, we used 75% as a proxy. According to our analysis, we found that:

- French-language school boards (both public and Catholic) spent more per student on classroom instruction, and French-language students (in both public and Catholic boards) outperformed English-language students. The average instructional cost per student in a French-language board was about \$3,000 more than an English-language board. The Ministry told us that French-language boards have higher costs associated with French language instruction, such as the cost of translating textbooks. In terms of student performance, French boards on average achieved the provincial target in eight of the nine EQAO tests, whereas English-language boards on average achieved the provincial target in only six of the nine EQAO tests. As well, the four-year graduation rate in French-language boards was 89% in the public system and 82% in the Catholic system, compared



**Figure 8: Five-Year Average Per-Unit Costs to School Boards within Regions, 2011/12-2015/16**

Source of data: Ministry of Education; calculated by the Office of the Auditor General of Ontario

	# of Boards in Region	Administration Costs per School (\$)			Accommodation Costs per School (\$)			Instruction Costs per Student (\$)			Transportation Costs per Student (\$)			Other Costs per Student (\$)		
		Min	Max	Variance	Min	Max	Variance	Min	Max	Variance	Min	Max	Variance	Min	Max	Variance
Northern Ontario rural	7	89,900	311,800	247	368,000	680,200	85	11,800	17,000	44	740	1,100	49	350	1,052	200
Northern Ontario rural/urban mix	15	93,000	231,800	149	341,000	699,000	105	9,800	19,200	97	670	1,600	131	0	1,600	—
Southern Ontario rural	10	83,700	195,700	134	353,800	578,100	63	9,100	11,400	25	750	1,200	60	300	1,000	233
Southern Ontario rural/urban mix	30	86,100	156,600	82	449,200	876,300	95	8,500	11,100	31	0	1,200	—	260	1,500	477
Toronto urban	2	113,800	144,200	27	694,700	764,700	10	9,500	9,800	3	200	300	50	300	700	133
GTA urban excluding Toronto	8	131,000	175,000	34	724,000	1,052,900	45	8,400	9,000	7	220	1,300	491	0	470	—
<b>Province-Wide</b>	<b>72</b>	<b>83,700</b>	<b>311,800</b>	<b>272</b>	<b>341,100</b>	<b>1,052,900</b>	<b>209</b>	<b>8,400</b>	<b>19,200</b>	<b>129</b>	<b>220</b>	<b>1,600</b>	<b>625</b>	<b>0</b>	<b>1,600</b>	<b>—</b>



with 81% and 70% respectively in the English-language system.

- Boards in Northern Ontario also spent considerably more per student on instruction: \$12,800 compared with \$9,300 in the south. This is a factor of the number of students enrolled. However, performance results are much lower in the northern boards, which on average achieved the provincial target in three of the nine EQAO tests, whereas southern boards on average achieved the provincial target in six of the nine EQAO tests. As well, the four-year graduation rate was 73% for boards in Northern Ontario, compared with 79% for boards in southern Ontario.

### RECOMMENDATION 6

To further understand cost drivers, we recommend that the Ministry of Education regularly analyze costs being spent by individual school boards with similar characteristics to identify areas where fiscal restraint or a review of their expenditures is needed.

### MINISTRY RESPONSE

The Ministry will continue to analyze costs drivers and how they compare to funding. The Ministry works regularly with school boards to identify funding requirements for special purpose grants; however, cost structures vary between boards due to several factors that are unique to each school board. These factors affect the cost per student across the province such as, but not limited to, the following: demographic circumstances, geographic area of each school board, socio-economic factors, teaching experience, negotiated collective bargaining agreements and performance of students.

## 4.4 Sick Days for School Board Employees Up 29% over Last Five Years

In 2016, a study commissioned by 56 Ontario school boards found that over a five-year period the average number of sick days per school board employee increased 29% overall: from nine days in the 2011/12 school year to 11.6 days in the 2015/16 school year.

This study excludes absences related to Workplace Safety and Insurance Board and long-term disability benefits. According to the study, the average number of sick days has increased province-wide for each employee group, such as teachers, custodians, educational assistants and early childhood educators.

Aside from the financial costs associated with absenteeism, the report also identifies indirect costs, such as reduced productivity and decreased morale for both staff and students. For more information on this issue, refer to our audit on School Boards' Management of Financial and Human Resources in Chapter 3, Section 3.12.

### RECOMMENDATION 7

To reduce the rise in the number of sick days by school board employees, we recommend that the Ministry of Education ensure that school boards develop and implement effective attendance support programs.

### MINISTRY RESPONSE

The Ministry agrees that this is an important issue. While attendance support programs are a local bargaining matter for school boards, the Ministry of Education is committed to encouraging practices that support staff attendance and well-being.



## 4.5 Ministry Places Moratorium on School Closures

The Ministry has taken action in recent years to support school boards facing issues of declining enrolment—resulting in many schools operating at less than 50% capacity—coupled with the deteriorating conditions of many schools that need to be repaired or replaced. However, more action is necessary to help school boards wrestling with decisions about closing or consolidating schools, or finding alternative solutions.

### 4.5.1 Ministry Measures to Address Underutilized Schools

The 2013 provincial Budget announced that the Ministry would consult with education stakeholders on efficiencies and modernization measures beginning in the 2014/15 school year. According to the Ministry's summary of the consultations that took place with stakeholders, "participants agreed that there are a number of ways of addressing unused space. One is to consolidate schools, which can involve closures and, sometimes, the building of a new school for the consolidated enrolments. Another is to share unused space in a school with another school, service provider and/or partner."

Since the consultations, the Ministry has taken steps through the development of the School Board Efficiencies and Modernization Strategy. These include the following changes to operating funding that began in 2014/15 and are to be phased in over four years:

- eliminating base top-up funding for the School Renewal and School Operations Allocations. At the time the strategy began, schools with underutilized space could receive additional funding beyond what their actual utilization rate would warrant. This could be as much as 30% top-up for schools with a utilization rate of 65% or less. The Ministry has announced it will phase out this top-up funding over the four years 2014/15 to 2017/18, which suggests that schools will no longer

receive money to maintain unused space. This in turn will require school boards to decide which schools to close or consolidate; and

- providing additional funding for staffing where boards make the most use of space by combining elementary and secondary schools in the same building. Previously, a school that housed both an elementary and a secondary school was treated as a secondary school for funding purposes. Under the new approach, these schools are provided funding for elementary and secondary teachers separately, based on a school's corresponding elementary and secondary enrolment. This should result in more overall funding.

Beginning in 2014, capital initiatives and funding were also increased, including a four-year, \$750-million School Consolidation Capital program to encourage boards to manage their school space more efficiently. At the time of our audit, 60 schools have been closed and 130 consolidated across 43 school boards. In addition, 69 schools from school boards within the same geographic boundaries shared facilities; in one case, schools from three boards share a facility. In the cases where facilities were shared, about half involved French-language schools sharing space with English-language schools, and half involved Catholic and public schools sharing premises.

### Ministry Reviewing Process of School Closures

In June 2017, however, the Ministry of Education announced plans to overhaul the process school boards use when considering school closures. While it completes the assessment, school boards will not be allowed to initiate any new reviews. The process of closing or consolidating schools is permitted to continue for schools for which the process was under way at the time the Ministry made this announcement.

The Ministry's reasoning for initiating an assessment of its school closure process was to address issues brought forward during the engagement sessions held in 10 rural and northern communities



**Figure 9: Percentage of Schools with Utilization Rates at 50% or Less by School Board Type, as of December 2016**

Source of data: Ministry of Education

School Board Type	Elementary		Secondary		Total	
	#	(%)	#	(%)	#	(%)
English Public Boards	192	33	146	25	338	58
English Catholic Boards	100	17	11	2	111	19
French Public Boards	22	4	30	5	52	9
French Catholic Boards	50	9	32	5	82	14
	364	63	219	37	583	100

in spring 2017, along with an online survey conducted to inform the Province's Plan to Strengthen Rural and Northern Education. Representatives at the sessions included parents, students, community members, municipal governments and school boards.

Issues the Ministry is planning to address include making the process more inclusive of community and student perspectives, and establishing principles and goals for student achievement and well-being to use when deciding on school closures and consolidations, rather than just cost savings.

The Ministry has stated that its plan is to consider revisions to its Pupil Accommodation Review Guideline, such as to provide longer minimum timelines and more recommended pupil accommodation options; clarify roles for school board trustees and municipal governments; and support an increased student voice. The Ministry also plans to develop new resources for school boards to standardize and validate data, and develop templates for stakeholders to engage school boards.

The Ministry's assessment of the physical condition of schools in the province, conducted between 2011 and 2015, found that \$15.2 billion in repairs are needed by 2020. Based on the Ministry's estimated replacement value, 19 school facilities would cost more to repair than replace. In addition, more than half a billion in repair needs over the next five years are required in school boards with less than 50% utilization. This adds to the need to make proper decisions regarding school closures and consolidations.

#### 4.5.2 Schools across Province Are Operating at Less than 50% Capacity

Despite these ongoing measures and initiatives, many schools in the province are still underutilized.

As of December 2016, 38% of schools in Ontario—1,852 schools—had utilization rates of 75% or less; 13%, or 583, of these schools were operating at a utilization rate of 50% or less.

We analyzed the utilization data and found that most schools operating at 50% capacity or less were English-language schools within the public school sector; 63% were elementary schools, while 37% were secondary schools (see Figure 9).

Every region of the province had underutilized schools, with the Greater Toronto Area having the highest percentage of underutilized schools: 29%. See Figure 10 for a regional comparison of those with a utilization rate under 50%.

### RECOMMENDATION 8

To work toward achieving the appropriate level of physical infrastructure required to meet current and future needs, we recommend that the Ministry of Education complete its review of the process school boards use when considering school closures and work with school boards to address the issues uncovered in the review.

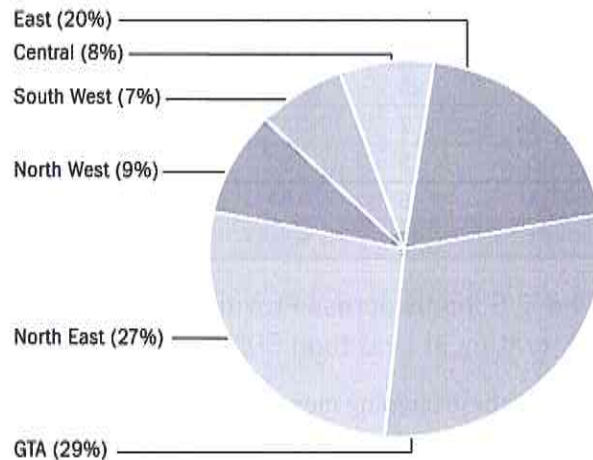
### MINISTRY RESPONSE

In June this year, Ontario launched its Plan to Strengthen Rural and Northern Education. The plan comprises process improvements



**Figure 10: Regional Distribution of Schools with Utilization Rates at 50% or Less**

Source of data: Ministry of Education



and funding enhancements designed to better support quality rural education, sustainable use of school space in rural communities, and decision-making around school closures.

While the spring engagement and the plan focused on Rural and Northern communities, the Ministry heard that the pupil accommodation review process requires an overhaul for all school boards across the province. The Ministry therefore began the process of revising its Pupil Accommodation Review Guideline (PARG) to promote inclusion of community impact alongside the focus on student achievement and well-being. The Ministry will also be revising the Community Planning and Partnerships Guideline (CPPG) to encourage joint responsibility for integrated community planning, with a focus on communication between school boards, municipal governments and community partners about boards' capital plans. The Ministry is currently seeking feedback on our proposed revisions to the PARG and CPPG online until December 6, 2017. In addition, we will be engaging with school board, municipal and other stakeholders at in-person meetings throughout the fall and will work with school boards to implement changes after engagements are completed in late winter 2018.

## 4.6 Enrolment Audits Insufficient to Show that Reported Enrolment Numbers Are Accurate

### 4.6.1 Ministry Audits Few School Boards' and Schools' Enrolment Numbers

Each year, the Ministry selects to audit a sample of school boards and schools from each of the selected boards. The number of schools audited depends on the number of schools within the board. The Ministry's goal is to have all 72 boards audited within an eight-year period.

The Ministry informed us that it used a risk-based approach to select school boards for enrolment audits. However, it only began formally documenting how school boards ranked against the risk factors considered beginning in 2016/17.

Risk factors considered include: the number of enrolment adjustments in previous audits; the school board's proximity to a provincial border; the size of the school board; the number of years since the board underwent an enrolment audit; and the school board's financial circumstances.

Over the six-year period from 2011 to 2016, only 260 or 6% of schools have been audited for enrolment purposes; that is, about 3% of all elementary schools in the province and 18% of all secondary schools. Figure 11 provides a breakdown of the audits conducted over this period. However, the Ministry does not know when each school last underwent an audit as it does not maintain a list of which schools were audited and when.

At the time of our audit, the Ministry had ten full-time staff involved with enrolment audits. These staff also performed other duties.

The Ministry told us it stopped performing enrolment audits on elementary schools in fall 2015 to focus on secondary schools, which it considers to be of higher risk of inaccurate enrolment information. This higher risk of inaccuracy is due to the mobility and attendance of secondary students and alternative programs offered at the secondary level. Given the Ministry's available resources, this approach may be reasonable. However, the



**Figure 11: Enrolment Audits Conducted from 2011 to 2016**

Source of data: Ministry of Education

Year Audited	# of School Boards Audited	# of Elementary Schools Audited	# of Secondary Schools Audited
2011	8	23	28
2012	9	13	24
2013	18	34	26
2014	14	27	33
2015	12	4	26
2016	9	0	22
<b>Total audited *</b>	<b>65</b>	<b>100</b>	<b>158</b>
<b>Provincial Total</b>	<b>72</b>	<b>3,712</b>	<b>878</b>
<b>% Audited</b>	<b>90</b>	<b>3</b>	<b>18</b>

\* Unique count as five school boards and two schools were audited twice in the six-year period.

number of audits in secondary schools actually decreased since the Ministry stopped auditing elementary schools.

Enrolment audits are conducted not only by Ministry staff, but also by school boards' internal and external auditors. However, the results of the school boards' own audits are not shared with the Ministry. Specifically:

- School boards' regional internal audit teams may also conduct enrolment audits if requested by the school boards' audit committees. These audit findings are only reported internally to school board management and the audit committee and are not shared with the Ministry. As a result, these audits do not provide any assurance to the Ministry. According to the school boards that responded to our survey, 63% have internal audit staff audit enrolment data.
- External auditors of school boards who audit the boards' financial statements also perform some procedures to gain assurance of the accuracy of student enrolment numbers recorded and reported to the Ministry. According to the school boards that responded to our survey, 61% have their external auditors

conduct some verification procedures on their enrolment data. However, no separate audit opinion or report is prepared. Although the procedures do aid school boards in gaining assurance that they are recording and reporting enrolment data correctly, the procedures are not as extensive as those conducted by the Ministry.

#### 4.6.2 Ministry Does Not Audit Enrolment of All Student Groups Used in Calculating Funding

The Ministry does not audit the enrolment of some student groups, such as those receiving special-education programs, even though such enrolment is used to calculate the amount of funding a school board receives under special purpose grants.

Enrolment audits conducted by the Ministry cover regular day-school students and ESL students. However, it does not audit enrolment in special education, Indigenous and French-language programs.

Enrolment of students receiving special-education programs and services was used to calculate 2% (or \$61.5 million) of the Special Education Grant in 2016/17. Enrolment of students in Indigenous language or Indigenous studies programs was used to directly calculate 52% (or \$32.1 million) of the Indigenous Education Grant in 2016/17. And enrolment of students in French-language programs was used to calculate 36% (or \$259.1 million) of the 2016/17 language grant.

#### 4.6.3 Significant Funding Adjustments Resulting from Enrolment Audits

We reviewed a sample of enrolment audit files completed during the three school years 2013/14 to 2015/16, and found that they noted weaknesses in schools' internal control systems over the enrolment recording process, across many school boards. We found the following common errors made by the schools audited in our sample:



- 14% incorrectly reported students enrolled in programs that provide courses through independent learning on the regular day-school register instead of on the independent-study day-school register;
- 49% did not have appropriate documentation available to support having on the enrolment register students who were absent for more than 15 consecutive days;
- 59% did not remove students from the enrolment register after the last day they attended classes due to changing schools or leaving the school system altogether; and
- 37% did not have appropriate documentation to support students who were not removed from the enrolment register, even though they were absent for 15 or more consecutively scheduled classes. This is the maximum number of consecutive classes a student is permitted to miss without providing medical documentation.

The Ministry tracks errors in the number of full-time equivalent students resulting from enrolment audits, but prior to fall 2016 it did not track the financial impacts of those errors. Upon our request, the Ministry calculated the financial impact of audit adjustments for the enrolment audits we reviewed. Based on 22 school board audits on 71 schools (1.5% of schools in the province) conducted from 2013/14 to 2015/16, we noted that the Ministry had reduced operating grants to school boards by \$4.6 million in total. Six of these boards each had their operating grants reduced by at least \$400,000.

However, the Ministry informed us that, as a matter of practice, it does not verify or follow up on whether school boards have implemented recommendations resulting from its enrolment audits.

### RECOMMENDATION 9

To increase assurance of the reliability of enrolment data used in calculating Grants for Student Needs funding to school boards, we recommend that the Ministry of Education:

- set specified audit procedures for enrolment audits that include auditing enrolment numbers of student groups used in calculating funding, such as Indigenous students and students receiving special-education programs or services; and
- assess the costs and benefits of requiring school boards to have these audits performed annually by their external auditors.

### MINISTRY RESPONSE

The Ministry agrees that it should review its current audit cycle in order to try to reduce the number of years between review periods; however, this review will need to also take into consideration additional administrative costs of this approach.

The Ministry will do the following:

- review the scope of its compliance audits to assess the financial impact of all allocations that are student driven. This review will be guided by the existing Ministry risk-based approach to drive the audit selection process for all future compliance type audits; and
- assess the costs and benefits of requiring school boards to have enrolment audits performed annually by their external auditors.

### RECOMMENDATION 10

To address errors found during enrolment audits and to mitigate the risk of future errors, we recommend that the Ministry of Education follow up with school boards to ensure that recommendations resulting from enrolment audits have been implemented.

### MINISTRY RESPONSE

The Ministry agrees to introduce a follow-up process with school boards regarding the implementation of enrolment and teacher qualifications and experience audit recommendations.



## 4.7 Ministry Often Does Not Follow Up When Deficiencies Found

### 4.7.1 Ministry Conducted Reviews of School Board Operations but Does Not Know If Recommendations Implemented

Between September 2008 and June 2011, the Ministry commissioned operational reviews of all 72 school boards. The purpose of the operational reviews was to assess the extent to which school boards have implemented leading practices in four functional areas set out in the Operational Review Guide for Ontario District School Boards: governance and school board administration; human resource management and school staffing/allocation; financial management; and school operations and facilities management. School boards were reviewed on 145 leading practices. At the end of the review, each board received an individualized report that included an assessment of its performance related to these leading practices.

Figure 12 summarizes the level of adoption of the 145 leading practices within each of the four functional areas by all school boards combined that the reviewers felt were in place at the time of the review.

Consultants also conducted a follow-up review 12 to 18 months after the school boards received their reports. These took place between 2009 and 2012, depending on when the original board review took place. The review teams followed up with each board only on selected recommendations to deter-

mine whether further progress had been made in adopting leading practices. No additional follow-up on progress has occurred since.

### RECOMMENDATION 11

In order to ensure that leading practices identified during the operational reviews of school boards have been adopted, we recommend that the Ministry follow up with school boards to identify the implementation status of key recommendations outlined in their operational reviews, and work with school boards to put best practices in place, where it has not been done.

### MINISTRY RESPONSE

The Ministry will continue to engage with school boards to encourage adoption of best practices. All Operational Review Reports, leading practices guides and sector summary reports are posted and available on the School Business Support Branch's website. In addition, the Ministry, in collaboration with school boards and using the Council of Senior Business Officials Effectiveness and Efficiency Advisory Committee, has developed a library of resources to assist school boards in adopting many of the best practices identified in the Operational Reviews. These resources are also available on the School Business Support Branch's website.

**Figure 12: Percentage of School Boards Adopting Leading Practices in Four Categories**

Source of data: Ministry of Education

Category	# of Leading Practices Reviewed	Adopted Status (%)				Total
		Fully	Significantly	Partially	Not	
Financial Management	47	1	79	19	1	100
Governance and School Board Administration	15	0	64	29	7	100
Human Resources Management and School Staffing/Allocation	33	2	81	17	0	100
Operations and Facilities Management	50	3	56	33	8	100



#### 4.7.2 Ministry Not Following Up with School Boards that Do Not Report in Accordance with Transfer Payment Agreements

We found that school boards' reporting as required under transfer payment agreements was often incomplete. In many instances, the missing information undermined the Ministry's ability to know if the allocation was spent as intended.

We selected 10 Education Program—Other (EPO) grants provided to school boards for the 2015/16 year and tested three transfer-payment agreements for each selected grant, for a total sample of 30 contracts. The grants were administered by five different Ministry branches, and represented almost half of total EPO funding provided to school boards in that school year.

In 30% of files reviewed, we found that the required reporting was incomplete. Although these school boards had submitted portions of what was required, they did not provide all required information. For example, a report submitted by one board, which received \$817,000 in funding for the Outdoor Education Program, did not report the number of students who participated in the program. Hence, the Ministry did not know the extent to which this program was serving students.

In another case, all three boards we tested for compliance with transfer payments for the Library Staff program had failed to report in their annual reports, as required, the number of staff hired. These three boards received a combined \$380,000 in funding for this program.

We asked the Ministry if it had followed up with the relevant school boards to receive the missing required information. It stated it had not done so.

Further, in all cases where the school board failed to provide the full required reporting, the boards received funding in the following year for the same program.

### RECOMMENDATION 12

Where the Ministry of Education determines that the best form of funding a program is through transfer payments, we recommend that the Ministry develop procedures to ensure the required reporting is fulfilled, and that if reporting requirements are not met, that additional funding not be provided the following year.

### MINISTRY RESPONSE

The Ministry agrees with the recommendation. As part of our modernization strategy for school board transfer payments, we will refine processes to ensure that transfer payments meet the requirements set out in the Transfer Payment Accountability Directive and Cash Management Directive. The Ministry's controllership and internal audit function will continue to provide advice and knowledge transfer to the Ministry via key forums and targeted compliance review and support.

#### 4.8 Concerns with Class Size Requirements

The Ministry has identified smaller class sizes as a key factor in student success. Class size restrictions for all grades that were in place at the time of our audit are outlined in O. Reg. 132/12 to the *Education Act, 1990* (Act) (see Figure 13). These class size restrictions determine the number of teachers needed by a school board.

On June 30, 2017, the regulation was updated to include a cap on the maximum class size for students in full-day kindergarten. In the 2017/18 school year, the board average for kindergarten class size remains at 26 students, but classes will be capped at 30 students, this drops to 29 students beginning in 2018/19 with the exception that 10% of a board's classes will be permitted to have up to 32 students. In addition, the cap on the average class size per board for Grades 4 to 8 was set at 24.5 or fewer by the 2021/22 school year.



**Figure 13: Class Size Restrictions per Grade**Source of data: *Education Act, 1990, O. Reg. 132/12*, effective until June 29, 2017

Grade	Class Size Restrictions
Full Day Kindergarten (Junior and Senior Kindergarten)	<ul style="list-style-type: none"> <li>• Average class size per school board not to exceed 26.</li> </ul>
Primary classes (Grade 1–3)	<ul style="list-style-type: none"> <li>• Maximum class size of 23 students.</li> <li>• At least 90% of classes in a school board should have 20 or fewer students.</li> </ul>
Grade 4–8	<ul style="list-style-type: none"> <li>• Regulation outlines average class size for 36 school boards ranging from 18.5 to 26.4.</li> <li>• Remaining 36 school boards are restricted to an average class size of 24.5 students per class.</li> </ul>
Mixed classes (Primary and Grade 4–8)	<ul style="list-style-type: none"> <li>• Maximum class size of 23 students.</li> </ul>
Secondary school	<ul style="list-style-type: none"> <li>• Average class size per school board not to exceed 22 students per class.</li> </ul>

#### 4.8.1 Class Size Requirements Not Enforced Throughout the School Year

The regulation that restricts class sizes for all grades requires school boards to report compliance on pre-determined dates. For elementary schools, boards can select any day in September to calculate their class sizes. For secondary schools, boards submit data on the number of classes and students per secondary school twice, once as of October 31 and then as of March 31.

The reported data is used by the Ministry to calculate secondary class size averages for each board. The four boards visited as part of the audit of school boards (see **Chapter 3, Section 3.12**) interpreted the requirement to mean that they had fulfilled the regulation as long as they met the class size restrictions on the reporting date. School boards indicated that maintaining the class sizes throughout the year would be difficult because enrolment numbers fluctuate, and the board might not have the money to add extra classes.

The boards said that the risk that class sizes will get too large is mitigated by the fact that teachers or their unions could contact the board if the class sizes do not comply with the class sizes negotiated with the local union. However, the negotiated class size caps may be different from the Ministry's. Although negotiated class sizes are generally less

stringent than those imposed by the Province, boards are aware that the unions enforce those restrictions throughout the school year.

#### RECOMMENDATION 13

To monitor whether class sizes are maintained throughout the year, and not just on the reporting dates, we recommend that the Ministry of Education:

- inform school boards that class size restrictions should be in effect throughout the school year, and not just on the reporting dates; and
- verify class sizes at select schools at various times throughout the year.

#### MINISTRY RESPONSE

The Ministry agrees to explore a process to verify class sizes at select schools throughout the year using a risk-based approach.

The Ministry expects school boards to make best efforts to maintain class size limits throughout the year while keeping the best interest of students in mind. However, stability is critical to student success. Should a few students move into or out of a particular neighbourhood later in the school year, changes that boards make to remain compliant could result in significant



disruption, as students are required to establish new relationships with teachers and classmates. It could also require that students change schools mid-year in situations where limited space is available.

The Ministry is committed to using the current September count date to determine school board compliance with class size requirements. This reporting date helps boards make staffing and class organization decisions based on actual enrolment in the first few weeks of school and to minimize further disruption to students.

#### 4.8.2 No Maximum Cap on Classes in Grades 4 to 12

As of the 2017/18 school year, only classes for full-day kindergarten and Grades 1 to 3 have a maximum class size restriction. For all other grades (Grades 4 to 8, and secondary school), school boards are restricted to an average class size. This means that not all students will be benefitting from smaller class sizes.

At the time of our audit, there was a cap on the average class size for Grades 4 to 8 per board. For half of the school boards, the average class size per board was capped at 24.5 students. And for the other half, the cap on the average class size ranged from 18.5 to 26.4 students (22 boards were above 24.5 and 14 boards were below). When the Ministry introduced the average Grades 4 to 8 class size restrictions in June 2012, it set the caps to match individual board's average class size at that time. A similar cap on the average class size among boards would promote equity across the system.

In April 2017, the Ministry announced that average class size restrictions for all 22 boards that were previously above 24.5, will be reduced to 24.5 by the 2021/22 school year, and the regulation was updated to reflect the change as of June 30, 2017.

However, there is no maximum class size for these grades. All other elementary school grades have a regulated class size maximum that ensures all Ontario students benefit from smaller class sizes.

### RECOMMENDATION 14

In order for all students in the province to benefit from smaller class sizes, we recommend that the Ministry of Education assess the costs and benefits of implementing maximum class size restriction caps for Grades 4 to 12, similar to ones in place for kindergarten and Grades 1 to 3, to complement the restrictions on average class size.

### MINISTRY RESPONSE

The Ministry agrees to continue to regularly review its policies on class sizes, in collaboration with school boards and education partners, to ensure the best outcomes for students. Changes to class size averages or limits can represent substantial financial impacts requiring extensive review.

## 4.9 Ministry Generally Ensuring School Boards Are Complying with Regulations

The *Education Act, 1990* has 81 regulations associated with it. We reviewed key regulations and followed up on those where the Ministry was required by the regulation to collect, review and approve information, or where we thought it would be prudent for the Ministry to provide oversight due to the potential impact on funding or student well-being. We examined Ministry processes for select regulations to determine the extent of assurance the Ministry obtains to ensure school boards are compliant.

We noted cases where the Ministry's oversight was effective in providing confidence that school boards were compliant with the requirements of the regulation. For example:

- **Budgeted deficits:** School boards can budget for an in-year deficit limited to the lesser of the school board's accumulated surplus from the preceding year or 1% of the current year's funding allocation. For deficits in excess of



this amount, school boards are required to get approval from the Minister of Education. For the period 2014/15 to 2016/17, 17 school boards budgeted for a deficit in excess of the stated limit in at least one of those years, and in all cases the proper ministerial approval was received.

- *School boards on financial recovery plans:* We reviewed the financial status for the 2016/17 school year of all eight school boards that have been on a multi-year financial recovery plan for at least one year to determine whether their financial health has improved. Based on the most recent budget information, in six of the eight cases the financial position reported by school boards has improved.
- *Special-Education Plans:* School boards are required to submit a special-education plan indicating the special-education programs and services that will be offered and how they will be delivered. The regulation also requires that the plan be reviewed and approved by the Minister. To accomplish this, the Ministry sets the standards for special-education plans and collects and analyzes the plans. For a sample of special education plans we reviewed, we noted that they had been submitted and approved by the Ministry as required.
- *School Board Audit Committees:* School boards are required to have functioning audit committees with a specified member composition. The Ministry ensures compliance through the annual submission by school board audit committees of their annual audit committee report, which lists the audits completed during the past year and those planned for the coming year. We reviewed submissions to the Ministry from all 72 school boards for each of the last five years ending 2015/16 and noted the requirements had been met in all cases.

#### 4.9.1 Legislated Spending Caps on Governance and Administration Expenses Increased When Compliance Not Achieved

School boards are required to report governance and administration expenses in the Ministry's education finance information system, which the Ministry uses to determine whether school boards are compliant with the legislated spending cap on board governance and administration.

Based on information submitted by school boards for the 2015/16 school year, we found 13 school boards were not in compliance with the cap, meaning the boards spent in excess of the allowable limit. Seven were French-language boards and six were English-language boards. For those boards that spent in excess of the limit, the median amount overspent was \$250,300. The Conseil des écoles publiques de l'Est de l'Ontario, whose cap was \$5.9 million, overspent by \$927,000.

We also noted that of the 13 boards that were not compliant in 2015/16, 11 were also non-compliant in the prior year.

The Ministry did not penalize any of these boards for being non-compliant. Rather, for the 2017/18 school year, it increased the spending cap on board governance and administration for most school boards. The overall increase since 2015/16 was 8%, with the highest increases provided to all 12 French-language boards—their limit increases ranged from 32% to 73%. We noted that if the 2017/18 caps were applied to actual spending in 2015/16, only one board would have exceeded its limit instead of the 13 previously noted. The Ministry informed us that the adjustment to the administration and governance limit was higher for the French-language school boards in order to acknowledge the additional costs of operating in a minority language.



#### 4.10 No Assurance Municipalities Remitting Correct Amount of Education Property Tax to School Boards

The Ministry of Education (Ministry) determines the total amount of funding each school board is entitled to receive in the year under the Grants for Student Needs (GSN). A portion of the GSN funding is remitted to school boards by municipalities through the Education Property Tax. The entire amount of funding is provided to them by the Ministry, as it is responsible for providing all remaining funding not provided through the Education Property Tax. The boards therefore have little incentive for ensuring the complete and accurate amount of Education Property Taxes is received.

The Ministry currently has no way of verifying that the amount of Education Property Taxes remitted by municipalities to the school boards is accurate. School boards submit audited financial statements to the Ministry; however, the statements are not detailed enough for the Ministry to confirm whether the education property tax revenues recorded by the boards are accurate. As part of the Ministry's validation of information submitted by school boards, finance officers perform a year-over-year variance analysis to assess the reasonableness of the amounts reported by school boards, but are unable to actually verify the amounts.

Education property tax rates are set centrally by the Ministry of Finance. However, as noted by the Ministry of Education, the collection and distribution process is cumbersome with over 400 municipalities remitting to the four school board types, four times per year, which adds up to 7,000-plus transactions per year.

In 2013, the Ministry of Education assessed other options for collecting and distributing the education portion of property tax. It noted that in British Columbia, the education portion of property tax is remitted by municipalities to the provincial government for distribution to school boards.

However, the Ministry of Finance told us there were concerns that any changes could result in less transparency and greater confusion about Educa-

tion Property Tax, as taxpayers could perceive that these taxes no longer support the education system.

#### RECOMMENDATION 15

To simplify the administrative process of remitting Education Property Tax funding to school boards and to ensure that all Education Property Taxes collected from taxpayers are being remitted, we recommend that the Ministry of Finance:

- assess whether there is benefit to collecting Education Property Taxes centrally on behalf of the Ministry of Education to distribute through the Grants for Student Needs; and
- develop procedures to verify the accuracy and completeness of Education Property Tax received.

#### MINISTRY OF FINANCE RESPONSE

The Ministry of Finance agrees that it is critical to ensure that all Education Property Taxes are being appropriately remitted.

The Auditor General's recommendation related to verifying the accuracy of Education Property Tax payments is consistent with efforts already underway by the Ministry of Finance to enhance the tracking and analysis of Education Property Tax transfers. The Ministry of Finance is committed to expanding its capacity to accurately track and verify the remittance of Education Property Taxes from municipalities to school boards, as well as between individual taxpayers and municipalities.

In response to the Auditor General's recommendation related to the collection of Education Property Taxes centrally, the Ministry of Finance will assess whether it would be beneficial to collect these revenues centrally.

When assessing options and developing additional procedures for tracking Education Property Tax revenues, the Ministry of Finance recognizes that it will be important to ensure that approaches are efficient and minimize any additional administrative burden for the Province as well as school boards and municipalities.



## Appendix 1: Additional Information on School Board Funding and Oversight

Source of data: Ministry of Education

### Allocation and Use of Grants For Student Needs

The amount of Grants for Student Needs (GSN) funding to be allocated to each school board is based to a large extent on overall student enrolment. But funding also takes into account many different factors, such as schools that are small, isolated, or have large numbers of students requiring special education programs or services, or who are without English or French as a first language.

Funding provided through the foundation grants can be used at the board's discretion for any purpose. A little over one-third of the funding provided through the special purpose grants is "restricted" in that it must be used for that special purpose. In some cases, funding must be spent on the specific purpose of the specific grant component; for example, funding for special equipment for students receiving special-education services or programs must be spent on such equipment. In other cases, funding for certain grant components can be spent for other purposes, as long as they are within the overall grant category. But in nearly two-thirds of cases, funding for specific components can be used for any purpose—it is not restricted to uses related to the grant category under which it is allocated. **Appendix 2** outlines whether special purpose funding for each grant component is restricted to the component, to its overall grant category, or is entirely unrestricted.

### Funding Source for the Grants for Student Needs

The amount of GSN funding calculated by the Ministry of Education (Ministry) for each school board represents the maximum amount the school board is entitled to from both the Province and the school board's municipality or municipalities.

The Ministry of Finance sets education property tax rates for the entire province. Municipalities collect the Education Property Tax and distribute it to school boards in their jurisdiction. No municipality generates enough Education Property Tax to cover the entire GSN allocation to the school boards operating in their areas. In 2016/17, the range was as low as 5% for a school board with a low tax base (such as the Conseil scolaire de district catholique des Aurores boréales) to as high as 54% for a school board with a large tax base (such as the Toronto District School Board). The Province provides funding for the difference between the Education Property Tax collected and the total allocation as determined by the GSN funding formula.

Every December, municipalities provide school boards with a statement that indicates the amount of Education Property Tax remitted to the school board in the prior calendar year and a forecast for the next calendar year. Municipalities generally remit the Education Property Tax to school boards on a quarterly basis. School boards report to the Ministry the amount of the Education Property Tax expected to be received from municipalities through budget estimates at the beginning of the school year. Any adjustment resulting from a year-end reconciliation is applied to the Ministry's payments in the following school year.

### Ministry's Processes for Updating the Funding Formula

Each fall, the Ministry holds annual consultations on education funding for the following school year with school boards and other stakeholders, such as school board trustee associations, teacher unions, and parent and student groups. The annual consultations provide an opportunity for school boards and stakeholders to advise the Ministry on their



concerns about education funding and provide suggestions on how to improve the funding mechanism.

Because Grants for Student Needs (GSN)—the main source of operational funding for school boards—is so large and diverse, the Ministry normally focuses on specific areas or themes of education funding each year. For example, the 2016/17 consultations focused on ways to improve specific grants intended to help close the achievement gap for specific groups of students. These included the Special Education Grant; the First Nations, Metis and Inuit Education Supplement; the Language Grant; the Learning Opportunities Grant; and the Safe and Accepting Schools Supplement. In 2017/18, the Ministry is seeking input on areas such as the renewed math strategy, digital education, Indigenous education, and compliance with the School Board Administration and Governance spending limit.

The Ministry summarizes consultation discussions in an annual document. Based on the information from the in-person discussions and any written submissions received from school boards and stakeholders, the Ministry may decide to make changes to education funding.

## Ministry Oversight Practices

### Budgeting and Reporting Cycle for the 2017/18 School Year

The school year runs from September 1 to August 31. In March, the Ministry releases the regulatory changes to the funding allocation to school boards for the next school year. Each school board then submits a budget estimate to the Ministry by June 30. Based on the estimates, the Ministry begins to remit funding to school boards on a monthly basis beginning in September. School boards submit revised budget estimates by December 15, and final actual expenses by November 15, following the end of the school boards' fiscal year of August 31.

The Ministry conducts a review of these estimates and actual expenses when submitted to

evaluate the accuracy, completeness, and reasonableness of the information provided. For example, staff review certain expense schedules submitted by boards, such as for school operations and maintenance and for salaries and benefits, to ensure boards have completed them. Additionally, staff compare prior years' closing balances to the current year opening balances to ensure boards have accurately inputted the data.

Staff also review year-over-year variances, such as for tax revenue and enrolment figures reported, to assess the reasonableness of the data submitted. The Ministry also assesses whether each school board is complying with the limit set on how much of an in-year deficit it can run and whether school boards are in compliance with the cap set on board administrative spending. The cap requires boards to spend on administration only what they are allocated under the School Board Administration and Governance Grant under the GSN, plus a portion of other GSN grants that support expenditures for board administration.

School boards submit all financial information to the Ministry electronically through its financial IT system. The financial IT system has built-in validation checks that are used to detect potential errors or variances in the numbers that the boards input into the system to create the financial reports. School board officials are not able to submit a report until all errors have been corrected in the system and explanations provided in response to warning messages that result from the validation checks. The Ministry's checking procedures include reviewing warning message explanations and verifying that the board's Director of Education has signed off on the submission.

After the school year ends, school boards submit audited financial statements to the Ministry by November 15. Upon receipt of these statements, the Ministry verifies that certain balances reported in the audited financial statements, such as total assets, total liabilities, total revenue and total expenses, agree with what is reported in the financial IT system.



School boards are required to report all expenses to the Ministry in defined expense categories under five main expense headings: instruction (classroom expenses and school administration costs); administration (school board administrative costs and trustees' expenses); pupil transportation; pupil accommodation (costs to operate and maintain the school); and other. The exception to this is the reporting required for restricted funding, such as for special education. For this funding, school boards must report the amount of their allocation spent for the restricted purpose.

### Other Specific Reporting Requirements under the GSN

Some GSN special-purpose grants have accountability mechanisms requiring boards to report financial and non-financial information to various branches within the Ministry.

For example, in 2016/17, \$59.8 million was allocated for Student Success, Grades 7 to 12. This funding was intended to enhance preparation for students to pass the Grade 10 literacy test, and to increase opportunities for students to participate in successful school-to-work, school-to-apprenticeship, or school-to-college pathways. Boards are asked to complete a report indicating strategies used to improve literacy and numeracy, and other ways students will be supported, plus a report detailing actual spending compared with budgeted amounts submitted at the beginning of the school year.

### Deficit Approvals

According to the Act, school boards are expected to submit a balanced budget for the year. However, they are permitted to have a budgeted in-year deficit. That deficit is limited to the lesser of the school board's accumulated surplus from the preceding year or 1% of the current year's operating funding allocation. The Minister of Education's approval is required if a school board's deficit exceeds this amount. If a school board has an in-year deficit—

projected or actual—that exceeds this amount or an accumulated deficit, the Ministry may order the school board to prepare a financial recovery plan.

The Financial Analysis and Accountability Branch reviews budget submissions to ensure compliance with the balanced budget requirements. It may provide school boards with external consultants to help them develop financial recovery plans. At the time of our audit, eight boards were on a recovery plan and one board was working with an external consultant to develop a recovery plan.

### Enrolment Audits Conducted by the Ministry

Student enrolment numbers play a significant role in determining the amount of funding the Ministry provides school boards. It is therefore important for the Ministry to ensure that enrolment numbers reported by school boards are accurate, both in total and by groups of students.

Funding for the majority of the GSN grant components (51 of a total of 74 grant components in 2016/17) is based to a large extent on student enrolment data. For example, the largest component of the GSN, the Pupil Foundation Grant—which in 2016/17 was \$10.6 billion or 46% of the entire GSN—is based directly on school boards' reported average daily enrolment.

As well, portions of some grants are based on enrolment of specific groups of students, such as English as a Second Language (ESL), French as a Second Language (FSL), and Indigenous students. For example, in 2016/17, the number of ESL students determined 31% of the Language Grant.

Student enrolment numbers for the current school year are reported by school boards through the Ministry's student information system (OnSIS) on October 31 and March 31.

The Ministry conducts enrolment audits to ensure accurate reporting of student enrolment data by reviewing school board records and student files at select schools. In addition to total enrolment in day school, the audits are also supposed to verify enrolment numbers in ESL, FSL in French-language



boards and alternative programs. The enrolment registers are audited in the fall and spring.

Key procedures during enrolment audits include, among other things, reviewing documentation to ensure that students are correctly recorded as full-time or part-time; that students transferring schools or leaving the publicly-funded school system were taken off the register on the correct date; that students absent for 15 or more consecutive school days have been removed from the register; and that ESL students are actually eligible for ESL funding.

### Reviews of School Board Operations

The Ministry commissioned external consultants to conduct operational reviews and follow-up reviews for all 72 school boards from 2008 to 2012. The Ministry's goal was to enhance management capacity within school boards by encouraging good stewardship of public resources and by leveraging and sharing best practices in the areas of govern-

ance and school board administration; human resource management and school staffing/allocation; financial management; and school operations and facilities management. The reviews cost the Ministry almost \$5.7 million in total.

The Ministry also conducted a follow-up review 12 to 18 months after the school boards received their reports. The review teams followed up with each board on selected recommendations based on the board's initial review and determined the level of adoption of the recommendations.

In 2013, the Ministry released a final report, *The Road Ahead: A report on continuous improvement in school board operations*. Although the report noted that school boards as a whole were functioning at acceptable standards of operational performance, it did identify areas of improvement needed in many school boards, such as the need to develop comprehensive attendance-support programs. The individual board reports and *The Road Ahead* are publicly available on the Ministry's website.



## Appendix 2: Restrictions on Spending of Special Purpose Grant Components, 2016/17

Source of data: Ministry of Education

Name of Grant	Funding (\$ million)	Name of Grant Component	Funding Restricted to Specific Component (\$ million)	Funding Restricted to Grant (\$ million)	Funding Fully Unrestricted (\$ million)
<b>Fully Restricted</b>					
<b>Special Education Grant:</b> Provides funding for programs, services, and/or equipment for students with special education needs	2,786.5	Special Education per Pupil Amount		1,437.9	
		Differentiated Special Education Needs Amount (Formerly High Needs Amount)		1,050.0	
		Special Equipment Amount	104.4		
		Facilities Amount		98.2	
		Special Incidence Portion		84.3	
		Behaviour Expertise Amount		11.7	
<b>Total</b>	<b>2,786.5</b>		<b>104.4</b>	<b>2,682.1</b>	
<b>Partially Restricted</b>					
<b>School Facility Operations and Renewal Grant:</b> Supports the cost of operating, maintaining and repairing school facilities	2,414.0	School Operations			2,053.0
		School Renewal	361.0		
<b>School Board Administration and Governance Grant:</b> Funding for administrative costs such as board-based staff, board offices and facilities, trustee compensation, parent engagement, consolidated accounting and internal audit	594.2	Board Administration			568.7
		Trustees Amount			11.2
		Reporting Entity Project			6.1
		Internal Audit	5.0		
		Parent Engagement Funding			3.0



Name of Grant	Funding (\$ million)	Name of Grant Component	Funding	Funding	Funding
			Restricted to Specific Component (\$ million)	Restricted to Grant (\$ million)	Fully Unrestricted (\$ million)
<b>Learning Opportunities Grant:</b> Provides funding to help students who are at a greater risk of lower academic learning	531.9	Demographic			353.0
		Student Success, Grades 7 to 12*	59.8		
		Grade 7 and 8 Literacy and Numeracy and Student Success Teachers*	21.5		
		Specialist High Skills Major*	18.7		
		School Effectiveness Framework*	18.3		
		Outdoor Education*	17.1		
		Literacy and Math Outside the School Day*	16.2		
		Library Staff	9.8		
		Mental Health Leaders	8.7		
		Ontario Focused Intervention Partnership Tutoring*	8.2		
		School Authorities Amalgamation Adjustment			0.6
<b>First Nations, Metis, and Inuit Education Supplement:</b> Supports programs designed for Aboriginal students, as outlined in the Ontario First Nation, Metis, and Inuit Education Policy Framework	61.4	First Nation, Métis, and Inuit Studies Allocation			23.2
		Per Pupil Amount	11.9		11.6
		Native Languages			8.9
		Board Action Plans			5.8
<b>Total</b>	<b>3,601.5</b>		<b>556.4</b>		<b>3,045.1</b>
<b>Not Restricted</b>					
<b>Student Transportation Grant:</b> Funding to transport students to and from school	903.6	Enrolment Adjustment			903.6
		Cost Update Adjustment			
		Fuel Escalator and De-escalator			
		Funding for Transportation to Provincial or Demonstration Schools			
<b>Language Grant:</b> Provides funding to meet school boards' costs for language instruction	714.7	French as a Second Language (English school boards)			259.1
		English as Second Language/ English Literacy Development			256.3
		Actualisation linguistique en français (only French school boards)			114.4
		French as a first language (for French School Boards)			79.7
		Programme d'appui aux nouveaux arrivants (only French school boards)			5.2



Name of Grant	Funding (\$ million)	Name of Grant Component	Funding Restricted to Specific Component (\$ million)	Funding Restricted to Grant (\$ million)	Funding Fully Unrestricted (\$ million)
<b>Interest Expense and Non-Permanently Financed Capital Debt:</b> Funding to service debt provided to school boards for capital expenditures	477.0	Interest on Capital Debt	411.3		
		Non-permanently Financed Capital			65.7
<b>Continuing Education and Other Programs Grant:</b> Supports programs aimed at adult learners and day-school students including secondary students who have completed more than 34 credits and wish to continue their studies	140.7	Continuing Education			56.7
		Summer School			32.5
		International Languages			26.8
		Adult Day School			16.6
		High Credit Day School			6.4
		Prior Learning Assessment and Recognition			1.7
<b>Safe and Accepting Schools Supplement:</b> Supports the Safe Schools Strategy and provides targeted support to secondary schools in priority urban neighborhoods	47.5	Safe and Accepting Schools			37.5
		Urban and Priority High Schools			10.0
<b>Total</b>	<b>2,283.5</b>		<b>411.3</b>		<b>1,872.2</b>
<b>Top-up Funding</b>					
<b>Cost Adjustment and Teacher Qualifications and Experience Grant:</b> Provides additional support for classroom staff who have qualifications and experience and average salaries above the benchmark provided through the Pupil Foundation Grant	2,019.5	Teacher Qualification and Experience			1,762.5
		Early Childhood Educator Qualification and Experience			127.7
		Labour Items and Benefits Trust			68.9
		Cost Adjustment for Non-Teaching Staff			56.6
		Non-Union Staff Reduction			(10.0)
		New Teacher Induction Program	13.8		
<b>Geographic Circumstances Grant:</b> Provides funding for higher costs due to remoteness of rural boards and schools	190.7	Remote and Rural			119.5
		Supported Schools			69.8
		Rural and Small Community			1.4
<b>Declining Enrolment Adjustment:</b> Available to school boards that adjust their costs downward	18.9	First-year component			18.9
		Second-year component			
<b>Total</b>	<b>2,229.1</b>		<b>13.8</b>		<b>2,215.3</b>
<b>Total Special Purpose Funding</b>	<b>10,900.6</b>		<b>1,085.9</b>	<b>2,682.1</b>	<b>7,132.6</b>
<b>Restricted and Unrestricted (%)</b>			<b>35%</b>		<b>65%</b>

\* Boards have flexibility in how they spend these allocations as long as in total they are spent on these seven programs marked with an asterisk.



## Appendix 3: Audit Criteria

Prepared by the Office of the Auditor General of Ontario

1. The allocation of funds by the Ministry of Education (Ministry) to school boards through the Grants for Student Needs (GSN) or transfer payment agreements (Education Programs—Other) should be equitable and reflect education needs across the province.
2. The Ministry should have effective procedures in place to ensure that its funding for the operation of school boards is being used as intended, particularly enveloped funding and funding through contractual agreements. Where necessary, corrective action should be taken on a timely basis.
3. The Ministry should have effective procedures in place to be able to accurately calculate the Ministry's portion of GSN funding. (e.g., School Board Operating Grant vs municipalities' Education Property Tax).
4. The Ministry should have effective oversight procedures to ensure that school boards operate in compliance with key legislated and Ministry policy requirements.
5. The Ministry should have processes in place to measure school board operating performance against established expectations, including those in the Ministry's strategic plan and mandate letter. Where necessary, corrective action should be taken on a timely basis.