

February 22, 2022

The Honourable Stephen Lecce  
Ministry of Education  
438 University Ave., 5th Floor,  
Toronto, ON M5G 2K8

Dear Minister Lecce,

The Ministry of Education has asked for feedback from interested parties on its proposed changes to PPM 81 (Provision of health support services in school settings). At the Board meeting held February 17, 2022, the following motion was passed unanimously:

**Be it resolved that the Chair write a letter to the Minister of Education about PPM 81 (provision of health support services in school settings) noting support for the letters written by SEAC and HDSB staff and expressing concern regarding the short timeline for stakeholder engagement and the short timelines and challenges regarding implementation..”**

Broad changes, such as those proposed in the consultation documents for PPM 81, require thorough, authentic engagement, and consideration of staffing, long-term financial, and operational risks on those who will be expected to implement these changes, centred on the well-being of all students.

The Ministry is not providing adequate time for authentic engagement or meaningful feedback. These changes will impact students, families, educators, support staff, and the school community as a whole. We are extremely concerned about the severe and negative implications that will accompany these changes, if the PPM is implemented as proposed and on the timelines proposed. The implementation timeline of September 2022 for these sweeping and fundamental service changes is extremely short. As this PPM covers vital day-to-day and life-saving services to students, it deserves a deeper discussion and analysis.

The SEAC Committee at the Halton District School Board has provided an outline of some of the key concerns that we share as a board. These include:

- the downloading of medical services to educational staff.
- the inequity in service that will be seen in our classrooms going forward. Students with certain exceptionalities will be able to use funding allocated for home services to provide support in the classroom, however students with other exceptionalities who do not receive funding will need to consider paying for it privately.

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- lack of additional funding to accompany such extensive changes. If Educational Assistants will be pulled from the classrooms to provide medical care for students, and administrators required to oversee private care providers in school settings, and ensure compliance with all regulations, additional staff will be required to undertake existing tasks.

We fully support and reinforce the messages that both HDSB staff and SEAC have shared and strongly urge the Ministry of Education:

- To plan for additional, meaningful and authentic engagement with relevant, education system stakeholders.
- To reconsider the implementation timelines of the proposed changes to PPM 81. Getting this correct for all students, families and staff is more important than an arbitrary timeline.
- To recognize that any increases to existing staff workloads must be considered within the context of existing labour agreements, and that the required funding, training and staffing be provided in advance of such changes.

On October 29, 2021, a [memo](#) citing the key objectives of the review identified strengthening evidence-based practices, improving access to health and rehabilitation services in schools; and clarifying roles and responsibilities to address gaps in services. It is important when considering these objectives that change be undertaken in partnership with those who will be implementing this PPM, so that we do our best work to support students who require these vital services and all students.

In closing, we request that the Minister consider the context in which these changes will occur. School staff and students have been profoundly impacted over two years of consistent change and stress due to the pandemic.

Thank you for considering the requests of the HDSB Staff, SEAC and Board of Trustees.

Sincerely,



Margo Shuttleworth  
Chair of the Board of Trustees, Halton District School Board

Cc: Hon. Ted Arnott, MPP  
Stephen Crawford, MPP  
Hon. Parm Gill, MPP  
Hon. Jane McKenna, MPP  
Effie Triantafilopoulos, MPP  
Ontario School Board Chairs (English Public, English Catholic, French Public, French Catholic)  
Cathy Abraham, President, Ontario Public School Boards' Association  
Alison Brindle, HDSB SEAC Chair