

February 10, 2022

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

RE: Feedback on PPM 81

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). The Special Education Advisory Committee (SEAC) of the Halton District School Board (HDSB) reviewed this document and, at its committee meeting on February 8<sup>th</sup>, 2022, carried the following motion:

*"That the HDSB SEAC Chair write a letter to the Minister of Education expressing the committees' unanimous opposition to the changes to PPM 81 in its current form."*

HDSB SEAC does not feel that the Ministry has provided adequate time for authentic engagement with all relevant stakeholders to provide meaningful feedback on the changes to PPM 81. As this PPM covers vital day-to-day and life-saving services to students, it deserves a fulsome discussion and analysis of the impacts that these changes will have on affected students, families, educators, support staff, and the school community as a whole. This has not been possible within the three-week timeline that we have been given to provide feedback on this PPM. We are extremely concerned that the short time frame will allow PPM 81 to be pushed through to implementation without a full understanding of the implications and will negatively impact the lives of all affected individuals going forward.

As a SEAC, mandated to represent the needs of all students with exceptionalities, and in this case of some of our most medically fragile students, we are highly concerned about the apparent downloading of medical services to educational staff. We believe that this is inappropriate, both ethically for medical professionals to be allowed to delegate their tasks to non-medical staff, and morally for the system to require Educational Assistants to undertake

services which are not in their job descriptions, they have not been medically trained for and which may impact the life of a student. We foresee huge difficulties in reaching an agreement for these changes to PPM81 with our union partners, which could lead to wider implications for an already stretched educational system.

Another major concern that the HDSB SEAC has about these changes is 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. This will not be the case for students with other exceptionalities who do not receive funding, unless their families are willing to pay for it privately. This is directly in opposition to the aims of HDSB and the Ministry of Education in promoting equitable access to support for all students.

The HDSB SEAC is also extremely concerned about the funding that must be provided to accompany such an extensive change in PPM81. If Educational Assistants will be pulled from the classrooms to provide medical care for students, and administrators will be required to oversee private care providers in a school setting and ensure compliance with all regulations, additional staff will be required to undertake their existing tasks. As a SEAC required to provide informed input on the HDSB special education budget in a few months, we are concerned that, by that time, we will have no information on the presence or lack of funding related to changes to PPM81 and the impact that this will have on special education services throughout our board. This makes it extremely difficult to perform our fiduciary duties in reviewing the budget.

In unanimously approving this motion, the HDSB Special Education Advisory Committee (SEAC) would urge the Ministry of Education to reconsider the implementation of the proposed changes to PPM 81, until there is meaningful and authentic engagement with relevant stakeholders to

address these concerns. This cannot be undertaken without an extension to the deadline for feedback. Without this opportunity to provide proper feedback, the HDSB SEAC unanimously opposes these changes.

Sincerely,

*Alison Brindle*

Alison Brindle, Chair - Halton District School Board Special Education Advisory Committee

Cc: Margo Shuttleworth, Chair - Halton District School Board