

# AGENDA – SEAC MEETING

## SPECIAL EDUCATION ADVISORY COMMITTEE

Wednesday, March 23, 2022 – 5:30 PM

Limestone Education Centre

220 Portsmouth Avenue, Kingston, ON

Virtual Meeting Link: <https://bit.ly/LDSBSEACMtgMar23>

Acknowledgement of Territory: “The Limestone District School Board is situated on the traditional territories of the Anishinaabe and Haudenosaunee. We acknowledge their enduring presence on this land, as well as the presence of Métis, Inuit and other First Nations from across Turtle Island. We honour their cultures and celebrate their commitment to this land.”

1. **WELCOME**
2. **ADOPTION OF AGENDA**
3. **DECLARATION OF CONFLICT OF INTEREST**
4. **APPROVAL OF MINUTES**
  - 4.1 **SEAC Minutes – February 16, 2022 (Pages 3-8)**
5. **BUSINESS ARISING FROM MINUTES**
6. **EDUCATIONAL SERVICES UPDATE**
  - 6.1 **Presentation: Educational Services Data Presentation – Educational Services Research Analyst Ellyn Clost-Lambert**

Limestone District School Board

Limestone District School Board is situated on traditional territories of the Anishinaabe & Haudenosaunee.

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## 7. CORRESPONDENCE

- 7.1 **Renfrew County Catholic District School Board** – Letter to Minister of Education and Minister of Health regarding the nursing shortage, dated February 11, 2022. (Pages 9-10)
- 7.2 **Thunder Bay Catholic District School Board** – Letter to Minister of Education endorsing Bill 172, the Education Statute Law Amendment Act in relation to Fetal Alcohol Spectrum Disorder (FASD), dated February 15, 2022. (Page 11)
- 7.3 **Durham District School Board** – Letter to Minister of Education regarding Change to definition of “Disability” and supporting Bill 172, dated February 22, 2022. (Pages 12-13)
- 7.4 **Durham District School Board** – Letter to Minister of Education regarding Comments with respect to PPM No. 81, dated February 25, 2022. (Pages 14-16)

## 8. ASSOCIATION UPDATES

### Helen Simson, Learning Disabilities Association of Kingston

The Learning Disabilities Association of Kingston will be holding our annual Speak Up for Ability forum on Saturday April 23rd. It will be a virtual event. We are honoured to have two of the lawyers who produced the Ontario Human Rights Commission's Right to Read Report provide a discussion of the report's primary findings and their implications for teaching literacy in Ontario's schools, with a particular focus on the implications for students with learning disabilities. The event is free and registration will open soon. The OHRC presentation will be followed by a panel of local literacy experts and then a moderated discussion including educators from both local school boards, parents, and other experts. Please check our website, [ldakingston.com](http://ldakingston.com) by the end of March to register.

## 9. OTHER BUSINESS - Administrative Report: Superintendent's Report (Pages 17-94)

- 9.1 **Ministry Updates** - Superintendent Scot Gillam
- 9.2 **Ontario Human Rights – Right to Read Inquiry** – Superintendent Scot Gillam
- 9.3 **Educational Services Update – Presentation: Enhancing Special Education Services in our District – March 2022 Monitoring Report** – Principal Michael Blackburn and Vice-Principal Jen Grasse

## 10. NEXT MEETING DATE

April 20, 2022

## 11. ADJOURNMENT

Limestone District School Board

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## SPECIAL EDUCATION ADVISORY COMMITTEE MEETING MINUTES

February 16, 2022

### PUBLIC MEETING

#### Roll Call:

<b>Trustees:</b>	<b>Members:</b>
<p>B. Godkin K. McGregor (Chair)</p>	<p>Present: S. Henderson-Todd, Lennox and Addington Resources for Children A. Martin, Member-at-Large (Queen's University) Z. Rogers, Community Living Kingston H. Simson, Learning Disabilities Association of Kingston C. Carriere-Prill, Member-at-Large C. Roberts, Easter Seals Ontario C. Norwich-Stevenson, Member-at-Large C. Tooley, Down Syndrome Association Kingston</p> <p>Regrets: N. Carson, Epilepsy South Eastern Ontario</p>
	<b>Staff:</b>
	<p>M. Blackburn, Principal of Educational Services H. Box, Special Education Program Coordinator L. Conboy, Mental Health Lead W. Fisher, Educational Services and Safe Schools Coordinator S. Gillam, Superintendent, Learning for All J. Grasse, Vice-Principal of Educational Services C. Snider, Special Education Program Coordinator T. Bonham Carter, Special Education Program Coordinator</p>
<b>Guests:</b>	<b>Recorder:</b>
<p>E. Carlin, Accessibility Lead, Itinerant/Resource Teacher</p>	<p>J. Senior, Administrative Assistant</p>

Limestone District School Board

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## 1. WELCOME

Chair McGregor called the meeting to order and welcomed everyone to the meeting. Superintendent Scot Gillam welcomed Tagget Bonham Carter, Special Education Program Coordinator, who is joining us while Tiiu Vail, Special Education Program Coordinator is on leave.

Chair McGregor read the Acknowledgement of Territory:  
“The Limestone District School Board is situated on the traditional territories of the Anishinaabe and Haudenosaunee. We acknowledge their enduring presence on this land, as well as the presence of Métis, Inuit, and other First Nations from across Turtle Island. We honour their cultures and celebrate their commitment to this land.”

## 2. ADOPTION OF THE AGENDA

*MOVED BY: Trustee Godkin that the agenda be approved.*

## 3. DECLARATION OF CONFLICT OF INTEREST

None at this time.

## 4. APPROVAL OF MINUTES

**4.1** SEAC Minutes – January 19, 2022

*MOVED BY: Trustee Godkin that the January 19, 2022, SEAC Minutes be approved.*

## 5. BUSINESS ARISING FROM MINUTES

None at this time.

## 6. EDUCATION SERVICES UPDATE

**6.1 Presentation: Accessibility in LDSB** – Superintendent Scot Gillam and Eva Carlin, Accessibility Lead, Itinerant/Resource Teacher began with a Mission Statement with respect to Accessibility in Limestone District School Board (LDSB).

### Accessibility in LDSB:

- LDSB provides environments that foster independence, dignity, and respect.
- LDSB is committed to providing services that are free of barriers and biases to our students, parent/guardians, the public and our staff.
- LDSB strives to ensure that the principle of equity of opportunity is reflected and valued in our learning and working environments.

A major way that we promote, sustain, and improve accessibility is through our Accessibility Planning Committee.

### Accessibility Planning Committee

- Advises on the preparation, implementation, and effectiveness of the LDSB Multi-Year Accessibility Plan.
- Reviews and advises on accessibility issues related to Board facilities.
- Advises on other accessibility related issues within LDSB buildings.
- Committee members consist of staff, community members, union partners, Educational Services Leadership Staff, administration within the Board, Facility Services personnel and an LDSB student representative.
- The Accessibility Planning Committee meets 3-4 times a year.

### Accessibility Resources

Please find below a list of key resources, which are found on our website to support students, families, and staff in helping to access or provide accessible services:

- [LDSB Accessibility Plan 2018-2022](#)
- [Accessible Formats and Communication Supports Process](#)
- [Accessible Formats and Communication Supports Request Form](#)
- [Accessible Formats and Communication Supports Reference Table](#)
- [Process for Barrier-Free/Student Accessibility Requests](#)
- [Resources to support teaching, learning and well being for all students and staff](#)
- [School Libraries - Accessible Document Access Reference Table](#)

### The LDSB Multi-Year Accessibility Plan

- Guided by the Board's Accessibility Standards Policy Statement – Policy 19.
- Developed in accordance with the Integration Standards Regulation under the Accessibility for Ontarians with Disabilities Act, 2005.
- Describes the measures that the Board will take over the five-year period from 2018 to December 2022 to identify, remove and prevent barriers to people with disabilities who work, learn, and participate in the Board community, which includes students, staff, parents/guardians, volunteers, and visitors.
- Next Plan will take us from January 2023 to December 2027.

Eva Carlin, Accessibility Lead, Itinerant/Resource Teacher, explained the steps that are completed when an accessibility issue is identified:

- Accessibility issue is communicated to Accessibility Lead and the student's school principal through community member (i.e., KidsInclusive, Early Expressions).
- Facility Services is contacted with service request.
- Accessibility Lead follows up with Facility Services to ensure that the service request is completed.
- The completed service request is recorded and updated on the Multi-Year Accessibility Plan each school year.

### Future Plans

- Review Level 1 – 3 Schools.
- Review and connection with Facilities Improvement Plans (FIP).
- Barrier Free washrooms – number and location.
- Accessible doorways – front and other key access points.

Chair McGregor called upon SEAC Members for questions regarding the Accessibility in LDSB Presentation.

## 7. CORRESPONDENCE

**7.1 Renfrew County Catholic District School Board** – Letter to Minister of Education expressing concerns regarding Online Learning Supports and Universal Design for Learning in provincial online learning resources and the platforms used to access these resources, dated January 13, 2022. Provided for information.

**7.2 Algoma District School Board** – Letter to Minister of Education endorsing Bill 172, the Education Statute Law Amendment Act (Fetal Alcohol Spectrum Disorder), dated January 11, 2022. Provided for information.

**7.3 Durham District School Board** – Letter to Minister of Education regarding Special Incidence Portion Claim Funding, dated February 3, 2022. Provided for information.

## 8. ASSOCIATION UPDATES

### **Candice Roberts, Easter Seals**

COVID-19 has put a hold on any in-person events we had planned. Our Snowarama is still happening, but we are changing the venues to virtual and online events. They can be shared at: <https://www.snowarama.org> We are at the preparation stages for March, as it is Easter Seals Month and when the Easter Seals Telethon occurs.

### **Helen Simson, Learning Disabilities Association of Kingston**

Learning Disabilities Association of Kingston will be holding our annual Speak Up for Ability Forum on Saturday, April 23, 2022. The theme will be literacy, as the Right-to-Read Report should be available at that point. Participants will include parents/families, educators, and other professionals. Attendance at the forum tends to be high and offers the opportunity to promote information to a broad local audience.

## 9. OTHER BUSINESS – Administrative Report: Superintendent’s Report

### 9.1 Ministry Updates:

#### **PPM 81: Invitation to Engagement**

On October 29, 2021, the government announced that it would be revising Policy/Program Memorandum 81: Provision of health support services in school settings (PPM 81). Some of the key objectives of the review are:

- Strengthening evidence-based practices;
- Improving access to health, rehabilitation, and other community-based clinical services for students with special needs in schools; and
- Clarifying roles and responsibilities to address gaps in services.

A roundtable discussion took place with English school boards on February 7, 2022. Superintendent Scot Gillam and Principal Michael Blackburn took part in this discussion. Limestone Speech and Language Pathologists have also provided input and Educational Services Leadership will also be submitting feedback prior to February 11, 2022. The draft PPM 81 has been included in the SEAC package and members are encouraged to submit their feedback as per the instructions on the draft copy.

### 9.2 Educational Services SEAC Update:

#### **Educational Services – Support Staff PA Day Sessions – February 2, 2022**

On February 2, 2022, Educational Services Staff provided ten workshops that Support Staff could access, based on 45-minute sessions throughout the day. Over 100 Support Staff enjoyed presentations that included:

- Supporting Students with Executive Functioning Needs – Jessi Lalonde
- Simple Strategies to Build Success for Secondary Students with ASD – Tagget Bonham-Carter, Hugh Box and Julie Burrows
- Person-Centred Care for Students with Complex Needs – Tiiu Vail, Jennifer St. Onge, Rachel Doornekamp and Kate Mann (KidsInclusive)
- Tech Tools, Strategies, and Platforms – Joseph Hamilton
- Essential for Some, Good for ALL! Making Instructional Decisions with a UDL Lens – Jessi Lalonde and Cheryl Snider
- Simple Strategies to Build Success for Elementary Students with ASD – Katherine Coles, Nancy Gourdier-Golle and Stephanie Waitson
- Building and Strengthening Relationships with Vulnerable Children and Youth – Sabrina Tripolitano
- Part One: Self Regulation – A Starting Point – Christa Cox
- Part Two: Supporting Students with Fetal Alcohol Syndrome Disorder (FASD) – Catherine Hudson
- Equity 101 – Laura Conboy and Rachael McDonald

### **Student Support Teacher (SST)/Learning Program Support (LPS) PD**

The February 8, 2022, SST/LPS Professional Development session focused on Numeracy/Literacy Intervention, Universal Design for Learning (UDL), and Multi-Disciplinary Teams. The SST/LPS course is facilitated by Educational Services Consultants and Coordinators and the Leadership Team. The SST/LPS Course is ongoing, and this was the third session.

### **Behaviour Management Systems (BMS) Training**

BMS Training took place in-person on Wednesday, February 2, 2022 (PA Day) for new Educational Assistants (EAs) and Student Support Counselors (SSCs). This allows all of our new EAs and SSCs to immediately enter the system and have the skills necessary to de-escalate situations as they arise.

## **10. NEXT MEETING DATE**

Wednesday, March 23, 2022

## **11. ADJOURNMENT**

*MOVED BY: Trustee Godkin that the meeting adjourn.*

*The meeting adjourned at 6:14 pm.*



**RECEIVED**  
Limestone District School Board

**FEB 24 2022**  
**Scot Gillam**

11 February, 2022

Honourable Christine Elliott  
Minister of Health  
5<sup>th</sup> Floor, 777 Bay Street  
Toronto, ON M7A 2J3  
[Christine.elliott@pc.ola.org](mailto:Christine.elliott@pc.ola.org)

Honourable Stephen Lecce  
Minister of Education  
Mowat Block, 900 Bay Street  
Toronto, ON, M7A 1L2  
[minister.edu@ontario.ca](mailto:minister.edu@ontario.ca)  
[Stephen.lecce@pc.ola.org](mailto:Stephen.lecce@pc.ola.org)

Honourable Christine Elliott and Honourable Stephen Lecce:

We are aware that the Province of Ontario is currently challenged by a shortage of nurses. Both the health and education sectors are experiencing the impact of these shortages. Currently, there are hundreds of students across the province awaiting nursing care that is required for them to attend school safely and meaningfully. We acknowledge that school staff cannot perform the duties of a nurse/registered health care professional, but stress that it is also imperative that we take every reasonable step to ensure that all students have access to education.

Though this shortage is not the responsibility of school boards, many school districts have advised they are committed to being part of a temporary solution for student and families affected. Boards have supported students requiring health care services in our schools by allowing parents/guardians or a temporary health care service provider, designated by the parents/guardians, to visit the school, adhering to all safety protocols, to provide the health care services, where possible, for their child. Furthermore, many schools are creatively engaging with and providing academic support to students who are at home awaiting nursing care. We are aware that updates to the Ministry of Health "*Family-Managed Home Care/Self-directed Care*" program eligibility requirements now include parents/guardians of students with complex medical needs that prevent them from attending school due to the shortage of school nurses. Boards are reporting that funding for this program is exceedingly difficult to access, and few families receive support, likely due to the extensive and complex process required to procure the funding.

It is a clear and widespread fact that in-person learning is the best learning environment for students. With support from the province and significant planning, commitment and efforts by District School Boards, schools opened this fall. Tragically, however, many students are unable to attend school with their

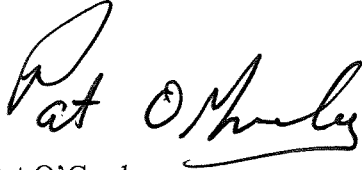
*...as an inclusive Catholic  
educational community, we  
are called to express our  
mission as church, to pass  
on the Good News of Jesus  
Christ, to make it relevant in  
the world today, and to be  
the hope for the future*

*Schools to believe in!*

peers, and their families are bearing much of the burden in managing the care of students who do not have at-school nursing support secured at this time.

While we acknowledge that there are ongoing provincial level discussions occurring across various ministries regarding the nursing shortage, we stand with other boards and request that this government makes it a top priority to develop a solution that allows all children access to the learning they require and deserve.

Sincerely,

A handwritten signature in black ink that reads "Pat O'Grady". The signature is written in a cursive style with a large initial "P" and a long horizontal stroke at the end.

Pat O'Grady

Chair, SEAC

Renfrew County Catholic District School Board SEAC

Cc: Chairs of all Ontario Special Advisory Committees



February 15, 2022

Honourable Stephen Lecce  
Minister of Education  
315 Front Street West  
Toronto, Ontario, M7A 0B8

Dear Minister Lecce,

Members of Thunder Bay Catholic District School Board's Special Education Advisory Committee would like to express our support for Bill 172, the Education Statute Law Amendment Act in Relation to Fetal Alcohol Spectrum Disorder (FASD).

It is imperative that all staff directly involved with students, such as principals, teachers, student support persons and early childhood educators, are aware of FASD, are able to recognize the early signs and are trained to provide appropriate accommodations for the success and well-being of our students. Inclusion of FASD in all Board of Education policies and guidelines is a vital step towards achieving equitable education for all of Ontario's students.

The members of the Thunder Bay Catholic District School Board's Special Education Advisory Committee ask that you acknowledge our support for Bill 172 in the pursuit for equitable education for all Ontario students.

Sincerely,

Hanni Vale  
Chair, Special Education Advisory Committee  
Thunder Bay Catholic District School Board

cc: Chairs of all Ontario Special Education Advisory Committees

February 22, 2022

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

Dear Minister Lecce,

**Re: Change to definition of "Disability" and supporting Bill 172**

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

Over the years, SEACs have engaged with the Ministry of Education to support a variety of amendments to the *Education Act* to include various disabilities or disorders. The most recent letters received by our committee are to support Bill 172 the *Education Statute Law Amendment Act* for Fetal Alcohol Spectrum Disorder.

The DDSB SEAC fully supports Bill 172; however, we see this process of proposing piecemeal changes to legislation for each new diagnosis or disorder as a perpetual colonial cycle that does not address student need in a timely matter nor through a Human Rights and equity lens.

For example, there is no common definition of disability between the *Education Act*, *Accessibility for Ontarian's Disability Act* (AODA) and the *Accessible Canada Act*. This difference are reflective of when these various pieces of legislation were enacted/amended. It is also important to note that much of the *Education Act* was written before the adoption of the Human Rights Code and has not had a thorough review through a human rights or equity lens.

The definition of disabilities under the *Education Act* is a narrow, medical one in which disability is viewed as a problem that exists in a person's body that requires treatment or care to fix the disability so a student can approximate "normal" functioning, failing which the student is to adapt and learn to function despite their disability. But we now know that disabilities are caused, not only by physical issues that exist in a person's body, but by environmental factors and barriers.

This is the view of the World Health Organization which states that "a disability results from the interaction between persons with impairments and attitudinal and environmental barriers that hinder their full and effective participation in society on an equal basis with others". The definition of disability under a social model emphasizes environmental factors in creating disability and that "disability" is not an attribute of the person.

In the 2019 legislative review of the AODA, the Honourable David C. Onley made a recommendation to update the definition of disability. He wrote,

From consultations and research, the Review learned that the trend internationally has been to shift from the medical model of disability to a social model that focuses on environmental barriers rather than individual health. The Review also heard that people with non-visible disabilities feel left out of the AODA.

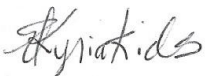
I am confident that the current definition of disability in the AODA is comprehensive and does in fact cover non-visible disabilities, or invisible or non-evident disabilities, as they are sometimes called. However, I also believe that the law should serve as an educational tool and it would be helpful to mention non-visible disabilities explicitly in the definition. I would suggest that Ontario consider adopting the definition in the pending\* Accessible Canada Act, which does this. The federal definition also aligns with the international emphasis on the social model of disability. It reads as follows:

“disability means any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment – or a functional limitation – whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person’s full and equal participation in society.”

\*Note: pending at the time of this report was released. The *Accessible Canada Act* received Royal Assent in June 2019.

DDSB SEAC fully supports the adoption of this recommendation from the Honourable David C. Onley in the context of the Education Act, or at the very least the Ministry adopt the same definition of disability as written in the AODA. We believe the implementation of this recommendation would curtail, if not completely stop, the number of requests to change the legislation as it covers current environmental, visible, non-visible or non-evidence disabilities or disorders. It also creates a more equitable and inclusive focus on our students so they can receive the support and programming necessary to ensure success in and beyond their school careers.

Sincerely,



Eva Kyriakides

SEAC Chair

Durham District School Board

cc: Chairs of Ontario Special Education Advisory Committees  
Hon. Marit Stiles, MPP  
Hon. Kathleen Wynne, MPP

February 25, 2022

VIA EMAIL: [specialeducation@ontario.ca](mailto:specialeducation@ontario.ca)

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

Dear Minister Lecce,

**Re: Comments with respect to PPM No. 81**

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

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

**Timelines and consultation process**

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

**Timelines for implementation**

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

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

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

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

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

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

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

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**Inclusion/exclusion of services**

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

**Roles of families**

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

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

Sincerely,



Eva Kyriakides

SEAC Chair

Durham District School Board

cc: Chairs of Ontario Special Education Advisory Committees



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## ADMINISTRATIVE REPORT: SUPERINTENDENT'S REPORT

### SPECIAL EDUCATION ADVISORY COMMITTEE

03/23/2022

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#### 9.1 Ministry Updates:

##### 2022-2023 Grants for Student Needs Funding (GSNs) Highlights

###### COVID-19 Learning Recovery Fund

The Ministry is providing \$304.0 million in time-limited and temporary additional staffing supports to continue to hire teachers, early childhood educators, educational assistants and other education workers to address learning recovery, the implementation of the first year of a fully de-streamed Grade 9, the delivery of remote learning, supports for special education, and maintaining enhanced cleaning standards. As part of this grant, school boards will be required to provide the option for remote learning in the 2022-23 school year. School boards are permitted to establish one virtual school per elementary and secondary panel based on local demand, where the funding can support the hiring of principals, vice-principals, school-based administrative support and/or Information Technology support.

###### Student Mental Health Investment

Recognizing the importance of promoting positive mental health, especially in light of the COVID-19 pandemic, an increase of \$38.3 million is being provided for student mental health within the Mental Health and Well-Being Grant. This amount includes an increase of \$25.2 million<sup>2</sup> through the Supporting Student Mental Health Allocation, transferred from Priorities and Partnerships Funding (PPF). This funding will continue to support student mental health to foster the continued learning and well-being of students. The base amount is increasing to \$301,723 per school board and the per-pupil amount is increasing to \$6.67. Starting this year, this allocation is enveloped meaning that it must be utilized for school or school board-based mental health staffing, programs, and initiatives. A new investment of \$10.0 million is being provided, of which \$5.0 million is to be used for evidence-based mental health programs and resources to support student resilience and mental well-being. The ministry will provide more details on the use of these funds in advance of the 2022-23 school year.

### **Local Special Education Priorities**

Funding of \$16.3 million to enhance support for students with special education needs, previously provided through PPF, is being provided through the Differentiated Special Education Needs Amount (DSENA) Allocation as a new Local Special Education Priorities amount. In alignment with the prior year, school boards may use this funding to address local priorities such as retaining additional educational and/or professional and paraprofessional staff (e.g., special education resource teachers, educational assistants, speech-language pathologists, occupational therapists, and psychologists, among others) and other local priorities such as evidence-based programs and interventions, as well as transition supports.

### **Increased Special Equipment Amount (SEA) Per-Pupil Amount**

Funding of \$7.4 million is being provided through the SEA Allocation to support more assistive technology for students with special education needs. In the SEA Per-Pupil Amount component, the base is increasing to \$20,000 and the amount per pupil is increasing to \$39.461.

### **Priorities and Partnership Funding (PPF) Transfers to GSN**

To further support the ministry's efforts to streamline funding while also reducing administrative burden for transfer payment recipients, the following PPF allocations are being transferred into the GSN:

#### **Well-Being and Mental Health Bundle**

Funding of \$3.0 million for the Well-Being and Mental Health Bundle is moving from PPF into a new Well-Being and Positive School Climates Allocation within the Mental Health and Well-Being Grant as previously noted above. This new Well-Being and Positive School Climates Allocation, funded through a base amount of \$10,000 per district school board and a per-pupil amount of \$1.14, supports school boards in meeting local needs and priorities that promote and support well-being and inclusive education, including strengthening positive school climates. This funding enables school boards to support activities in their improvement and multi-year strategic plans.

### **2022-23 Priorities and Partnerships Funding (PPF)**

#### **Summer Learning for Students with Special Education Needs**

The ministry will provide \$10 million for the 2022-23 school year school boards to deliver transition programs and additional staffing during the summer for students with special education needs.

**Supporting Students with Special Education Needs/ Students with Disabilities**

Application-based funding for school boards to implement initiatives to prevent and remove accessibility barriers experienced by students with special education needs and/or disabilities. Applications would be submitted to fund projects that related to Awareness & Training, Curriculum-Instruction-Assessment, Digital Learning & Technology, and Organizational Barriers.

**Special Education Additional Qualification (AQ) Subsidy for Educators**

Funding will support educators' participation in approved Schedule C and Schedule D special education Additional Qualification (AQ) courses.

**Developmental Disabilities Pilot: Student Transitions**

Funding to support select school boards to explore and implement successful practices in transitioning students with developmental disabilities to work through an intensive job-placement program.

**Early Intervention in Math for Students with Special Education Needs**

The funding is intended to support school boards in implementing early interventions in Math for students with special education needs. Funding may be used to support elementary students with a goal of increasing student engagement, preventing learning gaps, and supporting students to prepare for de-streamed Grade 9 math.

**Mental Health and Well-Being PPFs****School Mental Health Ontario (SMH-ON)**

As part of the government's commitment to build a comprehensive and connected multi-year mental health and addictions system across the lifespan, funding for School Mental Health Ontario (SMH-ON) will continue. SMH-ON will receive \$6.5 million in 2022-23 to provide implementation support to all 72 district school boards through clinical expertise, evidence-based resources/practical tools for educators, the delivery of consistent professional learning to school-based mental health clinicians and cross-sectoral work with partners in other sectors to ensure alignment with the broader provincial system of mental health services.

**Health Resources, Training and Supports**

This funding is used to develop new resources and supports, and to deliver local training to principals/vice-principals, educators and other school staff related to current and emerging health and safety issues. In past years, this has included supports connected to cannabis use, vaping, gaming, and nutrition. For school year 2022-23, school boards are encouraged to continue using funds to support effective implementation the ministry's Policy Program Memorandum (PPM) on anti-sex trafficking.

### **Tutoring Supports Program**

In order to address the impacts of the COVID-19 pandemic, the ministry is making an historic investment of approximately \$175 million over the current and next school year for a new Tutoring Supports Program to be administered by school boards. Boards will receive amended 2021-22 PPF transfer payment agreements (TPAs) with 50% of the allocation to be spent by August 31, 2022. The remaining 50% will be included in 2022-23 school board PPF TPAs at the start of the school year. Program implementation can begin immediately and must begin no later than the first week of April based on the following criteria:

- An average group size of 5 students
- Smaller average group size, including 1:1 individual tutoring, for students who would benefit from more attention based on student need
- Options will be provided to students to access tutoring during a variety of time slots to meet student need (i.e., before and after school, during the school day, on weekends, and during the summer)
- Tutoring programs will prioritize math and literacy and other foundational learning skills
- Programs may be offered in collaboration with community partners

## **9.2 Ontario Human Rights Right to Read Inquiry**

On February 28<sup>th</sup>, the Ontario Human Rights Commission released the Executive Summary of the Right to Read Inquiry.

You can access that summary at this link: [Right to Read Executive Summary](#).

A copy was also included in the SEAC package. Further information will be brought to SEAC as this report and other documentation from the Ministry are discussed with Senior Team and Trustees.

## **9.3 Educational Services SEAC Update:**

### **Building Our Vision for the Future: Enhancing Special Education Services in our District**

- March Monitoring Report – Principal Blackburn and Vice Principal Grasse

**Prepared by:** Scot Gillam, Superintendent of Learning for All and Indigenous Education



**EXECUTIVE SUMMARY**

# RIGHT TO READ

**Public inquiry into human rights issues affecting students with reading disabilities**



**Ontario  
Human Rights Commission**  
Commission ontarienne des  
droits de la personne

Brennan

# What the right to read means to me...



**About the artist:** This artwork was submitted by a student, Brennan, who attended one of the Right to Read inquiry public hearings.

# Executive summary

**WARNING:** This summary deals with topics that may trigger some readers. It includes references to bullying, emotional and physical abuse, mental health challenges, self-harm and suicide. Please engage in self-care as you read this material at: [www.ohrc.on.ca](http://www.ohrc.on.ca) under **List of supports**.

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# Introduction

## The right to equal education includes the right to read

On November 9, 2012, the Supreme Court of Canada released a unanimous decision recognizing that learning to read is not a privilege, but a basic and essential human right. The Supreme Court found that Jeffrey Moore, a British Columbia student with dyslexia, had a right to receive the intensive supports and interventions he needed to learn to read. The school board's failure to provide special education programs and services, including intensive intervention, denied Jeffrey Moore meaningful access to education, resulting in discrimination under the British Columbia *Human Rights Code*. The Court said:

...adequate special education...is not a dispensable luxury. For those with severe learning disabilities, it is the ramp that provides access to the statutory commitment to education made to *all* children...

The *Moore v British Columbia (Education)* decision (*Moore*) confirmed that human rights laws in Canada protect the right of all students to an equal opportunity to learn to read. This decision was lauded as a significant victory for students with disabilities, particularly students with reading disabilities. Many hoped that it would act as a catalyst for systemic change in Ontario's education system.

Almost 10 years after the *Moore* decision, the Ontario Human Rights Commission (OHRC) released a report on its public inquiry into the right to read. The right to read applies to ALL students, not just students with reading disabilities. This inquiry found that Ontario is not fulfilling its obligations to meet students' right to read.

Despite decades of multi-disciplinary research on what is most effective for teaching students early reading skills, and after *Moore* affirmed that meaningful access to education, including learning to read, is a human right, Ontario is systematically failing students with reading disabilities and many other students. The promise of *Moore* has not been fulfilled. This leaves many students at risk for significant life-long difficulties. The inquiry is not just about an equal right to read – it is about an equal right to a future.

## Launching a public inquiry

The OHRC has a mandate to protect human rights and the public interest in Ontario and promote compliance with the Ontario *Human Rights Code* (*Code*). The OHRC does this by developing policies, initiating public inquiries, and engaging in strategic litigation. Although the OHRC does not have the same power as the Human Rights Tribunal of Ontario (HRTO) to make legally binding findings of discrimination or to order remedies, it has a unique power to hold systemic inquiries in the public interest (section 31 of the *Code*). This includes the power to request documents, data and information, analyze it with the help of experts and issue findings and recommendations. The information obtained in a section 31 inquiry may be used as evidence in a proceeding before the HRTO.

In October 2019, building on previous work on accessible education, including its intervention in *Moore* and its *Policy on accessible education for students with disabilities*, the OHRC launched a public inquiry into human rights issues facing

### **The science of reading**

This report uses terms like the “science of reading,” “reading science,” “research-based,” “evidence-based” and “science-based” to refer to the vast body of scientific research that has studied how reading skills develop and how to ensure the highest degree of success in teaching all children to read. The science of reading includes results from thousands of peer-reviewed studies and meta-analyses that use rigorous scientific methods. The science of reading is based on expertise from many fields including education, special education, developmental psychology, educational psychology, cognitive science and more.

students with reading disabilities in Ontario’s public education system. The OHRC worked with two experts in reading development and reading disabilities, Dr. Linda Siegel and Dr. Jamie Metsala, to analyze significant information obtained from a representative sample of eight English-language public school boards, all 13 Ontario English-language public faculties of education, and the Ministry of Education (Ministry).

The inquiry also heard from thousands of students, parents, organizations, educators and other professionals through surveys, public hearings, a community meeting, engagements with First Nations, Métis and Inuit communities, artwork, emails, submissions, meetings and telephone calls.

The inquiry, the first of its kind in Canada, combined the OHRC’s expertise in human rights and systemic discrimination with Dr. Siegel and Dr. Metsala’s expertise in reading development, reading disabilities/dyslexia, interventions to improve reading and the extensive body of research science.

## **School boards and faculties of education reviewed for the inquiry**

The eight sample English-language school boards selected for the inquiry were:

1. Hamilton-Wentworth District School Board (Hamilton-Wentworth)
2. Keewatin-Patricia District School Board (Keewatin-Patricia)
3. Lakehead District School Board (Lakehead)
4. London District Catholic School Board (London Catholic)
5. Ottawa-Carleton District School Board (Ottawa-Carleton)
6. Peel District School Board (Peel)
7. Simcoe Muskoka Catholic District School Board (Simcoe Muskoka Catholic)
8. Thames Valley District School Board (Thames Valley).

Ontario's 13 English-language public faculties of education were:

1. Brock University
2. Lakehead University
3. Laurentian University
4. Nipissing University
5. Queen's University
6. Trent University
7. University of Ontario Institute of Technology
8. University of Ottawa
9. University of Toronto
10. University of Windsor
11. Western University
12. Wilfrid Laurier University
13. York University

## **Focusing on early reading**

Literacy goes beyond the ability to read and write proficiently. It includes the ability to access, take in, analyze and communicate information in a variety of formats, and interact with different forms of communication and technologies.

Word-reading and spelling are a foundation for being able to read and write and successfully interact with different forms of communication. Everyone wants and needs to be able to read words to function in school and life. The inquiry heard many accounts of people who could not read a menu in a restaurant, read ingredients on a food label, read street signs, play video games that involve reading, search the Internet, look at websites or access other forms of digital media.

Becoming fully literate also requires more than just the ability to read words. The ability to understand the words that are read and the sentences that contain these are important for strong reading comprehension. A comprehensive approach to early literacy recognizes that instruction that focuses on word-reading skills, oral language development, vocabulary and knowledge development, and writing are all important components of literacy.

The inquiry focused on word-level reading and the associated early reading skills that are a foundation for good reading comprehension. This focus was chosen because of the ongoing struggle for Ontario students to receive evidence-based instruction in these foundational skills; the difficulty in meeting early reading outcomes for many students, often from marginalized or *Code*-protected groups; research recognizing the importance of instruction in these foundational word-reading skills; and the recognition of the rights of students with dyslexia in the *Moore* decision.

Word-level reading difficulties are the most common challenge for students who struggle to learn to read well. Most students who have issues with reading comprehension have word-level reading difficulties.

Despite their importance, foundational word-reading skills have not been effectively targeted in Ontario's education system. They have been largely overlooked in favour of an almost exclusive focus on contextual word-reading strategies and on socio-cultural perspectives on literacy. These are not substitutes for developing strong early word-reading skills in all students. The OHRC's position is that making sure all children are taught the necessary skills to read words fluently and accurately furthers and does not detract from equity, anti-racism and anti-oppression.

Early word-reading skills are critical, but they are not the only necessary components in reading outcomes. Robust evidence-based phonics programs should be one part of broader, evidence-based, rich classroom language arts instruction, including but not limited to story telling, book reading, drama, and text analysis. Evidence-based direct, explicit instruction for spelling and writing are also important to literacy. Many students, including students with reading disabilities, have difficulties with written expression. Explicit, evidence-based instruction in building background and vocabulary knowledge, and in reading comprehension strategies, are all parts of comprehensive literacy instruction. Although the inquiry focused on one most frequent obstacle to students developing a strong foundation in early reading skills, the report also acknowledges the other elements of a comprehensive approach to literacy. These elements must also be addressed when implementing report recommendations.



All photos/Getty Images

## **Focusing on the Ministry of Education, school boards and faculties of education**

The inquiry focused on the Ministry, school boards and faculties of education (faculties) because each has a central role in meeting the right to read. The Ministry has ultimate responsibility for education in Ontario. It sets the curriculum that Ontario teachers must teach. It can set out provincial standards, for example for assessment, evaluation and reporting, data collection and special education services, and require boards to follow them. The Ministry also funds education.

Ontario's 72 public school boards deliver education services, including special education, in accordance with Ministry requirements. They also have significant discretion on how to spend funds and deliver services, including special education services. Faculties have a key role in preparing teachers to teach students early reading skills, and in providing ongoing professional development in areas such as reading and special education.

Other education sector partners have important responsibilities in addressing the rights of students with reading disabilities. The Ontario College of Teachers (OCT) establishes requirements for teacher education programs for future teachers (also called pre-service teachers) and Additional Qualification courses for current teachers (also called in-service teachers). The inquiry makes recommendations about what pre-service and in-service teachers should learn about teaching reading and reading disabilities.



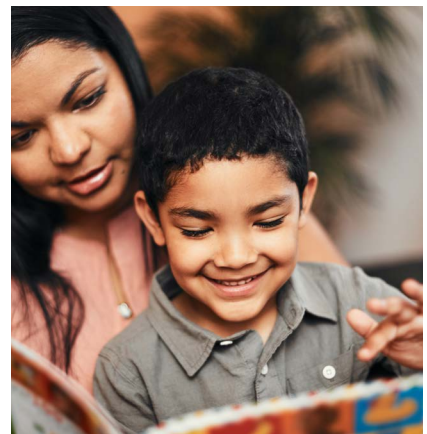
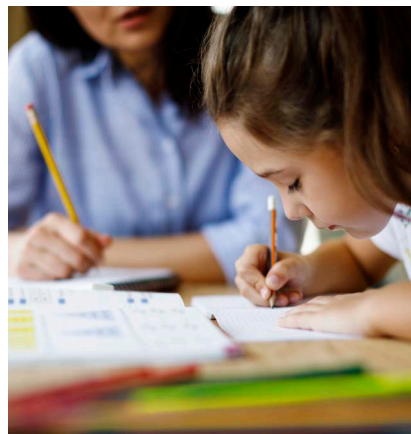
The Education Quality and Accountability Office (EQAO) administers provincewide tests to evaluate the achievement of students with the goal of promoting accountability and continuous improvement in Ontario’s public education system. The inquiry makes recommendations related to EQAO data.

The Ontario Psychological Association (OPA) and the Association of Psychology Leaders in Ontario Schools (APLOS) establish guidelines for diagnosing students’ reading disabilities, and the inquiry makes recommendations to the OPA and APLOS about these guidelines.

The *Right to Read* report sets out the inquiry’s findings and 157 interconnected recommendations for these education sector partners on how to meet the right to read. Because the issues are systemic and require a consistent system-wide response, the report recommends that the Ministry work with an independent expert or experts to implement many of the recommendations. It will also be critical that the recommendations be implemented in their entirety, because together they form a holistic approach to the right to read. The OHRC also emphasizes that sufficient, stable, ongoing funding will be needed to successfully implement these recommendations.

Although the inquiry’s primary focus was on English-language boards and faculties of education, it also identified challenges related to French-language education. Most inquiry findings and recommendations likely apply equally to French-language education and the OHRC expects that the Ministry and French boards will address and implement the recommendations as appropriate for students learning in French.

**The inquiry is not just about an equal right to read –  
it is about an equal right to a future.**



# Background



## Key findings and recommendations

This report uses both the terms reading disability and dyslexia. Currently, the Ontario education system only uses the term learning disability, which typically only includes students who have been formally identified with a learning disability through a process called an Identification, Placement and Review Committee (IPRC). The education system does not identify if the learning disability affects word reading or another area such as mathematics, and does not collect data about students who have not been formally identified. A lot of valuable information for planning and tracking is therefore lost.

The term “dyslexia” is also not used in the Ontario education system. However, the American Psychological Association’s *Diagnostic or Statistical Manual of Mental Disorders* (DSM-5) recognizes dyslexia as an appropriate term for referring to a pattern of learning difficulties characterized by problems with accurate or fluent word recognition, poor decoding, and poor spelling abilities. After the inquiry was launched, the Ontario Psychological Association updated its *Guidelines for Diagnosis and Assessment of Children, Adolescents, and Adults with Learning Disabilities* to recognize the value of psychologists using the term dyslexia when making a diagnosis. Dyslexia is well researched and understood, and there are many helpful dyslexia resources. Some also prefer the term “dyslexia” as it indicates a learning difference, and are concerned about the socially-constructed stigma that may be associated with a “disability” label. Under the *Code*, people’s preferred self-identification should be respected and recognized.

## Recommendations

The OHRC recommends the Ministry of Education, faculties of education and school boards explicitly recognize the term “dyslexia” [Recommendations 51, 54, 55, 56, 114, 126].

## Recommendations

The OHRC recommends that school boards identify and track students by the type of learning disability/academic area that is impaired (for example, identifying that a student has a reading disability instead of a learning disability) [Recommendation 126] and collect data specific to all students with reading disabilities (including students who have not been formally identified through an IPRC) [Recommendations 133, 135, 142, 143, 145, 148].

## Reading disabilities and other barriers to learning to read

Dyslexia or a reading disability in word reading is a specific learning disability characterized by difficulties with accurate and/or fluent word reading and/or poor decoding and spelling abilities. These word-reading difficulties may also result in problems with reading comprehension and can limit learning vocabulary and background knowledge from reading. Dyslexia is the most common learning disability, and learning disabilities are the most prevalent special education exceptionality in Ontario. This means that dyslexia/reading disabilities are the most prevalent disabilities in schools. There are students with dyslexia/reading disabilities in every Ontario classroom.

Although dyslexia is assumed to be neurobiological in origin, there is evidence that with evidence-based reading instruction, early identification, and early evidence-based reading intervention, at-risk students will not develop a “disability.” If the education system is working as it should, a reading disability can be prevented for almost all students.

Students with other disabilities, including intellectual disabilities, autism spectrum disorder and hearing disabilities, may also struggle to learn to read when ineffective approaches are used in the classroom. Because of marginalization and structural inequality, Black and other racialized students, First Nations, Métis and Inuit students, multilingual students, or students from low-income backgrounds are also at increased risk for reading difficulties. Approaches to teaching early reading that build skills for decoding words and language comprehension have been proven to work best for all students, and are essential for many students.



For most students, but particularly vulnerable students, reading outcomes depend on the quality of reading instruction they receive. Nearly all students can learn to read words proficiently with science-based systematic and explicit instruction in foundational reading skills. Identifying and intervening early with the small number of students who may still struggle to learn to read words well, sets them up for future success in school, work and life. But failing to prevent a word-reading disability in the vast majority of cases where this is possible, has serious life-long consequences. The research and lived experience accounts gathered in the inquiry show the negative trajectory of students who do not develop proficient early word reading skills.

## **What happens when students do not learn to read**

Students who don't develop good early reading skills can very quickly begin to experience negative academic consequences, which may only get worse. Reading is necessary for many aspects of learning in school, and initial difficulties can increase over time and impede accessing the curriculum in other subjects. This is one of several reasons why early intervention for struggling readers is essential.

When students have difficulty learning to read, it can affect their confidence in their academic abilities and overall self-esteem, and lead to significant mental health concerns. The inquiry heard many students describe themselves as “stupid” because they cannot read, even though reading disabilities have nothing to do with intelligence. Consistent with findings in the academic research, many students and parents told the inquiry about depression and anxiety, school avoidance, acting out, being bullied or victimized, self-harming, and thinking about or even attempting suicide.

Students with reading disabilities often underachieve academically. They are more likely to drop out of school, less likely to go on to post-secondary education, and tend to take longer to finish programs they enroll in. The effects can continue past their schooling and can have a negative impact on employment, and lead to lower incomes, poverty and homelessness and higher rates of involvement in crime and incarceration. Adults with dyslexia told the inquiry about long-term effects of not learning to read, such as mental health and substance abuse issues and negative impacts on their employment.

**The inquiry heard many students describe themselves as “stupid” because they cannot read, even though reading disabilities have nothing to do with intelligence.**

## **Broader impacts on families and society**

Parents also reported impacts on the family, something that has also been described in the literature. Parents talked about the financial effects when families spent money on private assessments

and tutoring, and gave up or changed their employment to have the time to support their child. Other family impacts included the challenges of navigating the school system, negative effects on relationships and significant mental health burdens.

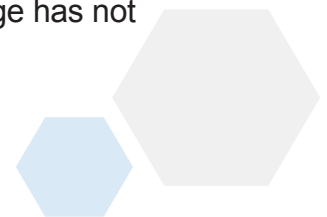


The broader impacts of low literacy on society are also well documented, which is why many organizations advocate for improving literacy in Ontario, with a focus on foundational word reading skills. For example, the Pediatricians Alliance of Ontario (PAO) and the Physicians of Ontario Neurodevelopmental Advocacy (PONDA) have recognized the relationship between literacy and health outcomes, and have called for curriculum and reading instruction that incorporates explicit, systematic instruction in phonics, early screening and early evidence-based intervention. The Canadian Association of Chiefs of Police has identified improving literacy as a tool to combat crime.

## Reducing the social and economic costs of low literacy

Investment in early reading significantly reduces the social and economic costs of low literacy to the individual, their family and society as whole. It also improves equity outcomes. Children from groups protected under the *Code* disproportionately suffer the effects of failing to use evidence-based approaches to teaching reading and supporting struggling readers. Their parents do not always have the same access to resources and private supports as more advantaged parents. These students rely on the public education system to give them a strong foundation in reading to help reduce their historical and social disadvantage. When the education system does not do this, it can worsen their marginalization and risk of inter-generational inequality.

These significant burdens on individuals, families and society are preventable. Dr. Louisa Moats, an expert on science-based reading instruction and teacher education, said in *Teaching Reading Is Rocket Science, 2020* that “the tragedy here is that most reading failure is unnecessary.” Decades of research shows us what we need to do to give all students equal opportunity to learn to read, but this knowledge has not translated into what is happening in schools.



## What is needed to teach all students foundational word-reading skills

The key requirements to successfully teach and support all students are:

1. **Curriculum and instruction** that reflects the scientific research on the best approaches to teach word reading. This includes explicit and systematic instruction in phonemic awareness and phonics, which teaches grapheme to phoneme (letter-sound) relationships and using these to decode and spell words, and word-reading accuracy and fluency. It is critical to adequately prepare and support teachers to deliver this instruction.
2. **Early screening** of all students using common, standardized evidence-based screening assessments twice a year from Kindergarten to Grade 2, to identify students at risk for reading difficulties for immediate, early, tiered interventions.
3. **Reading interventions** that are early, evidence-based, fully implemented and closely monitored and available to **ALL** students who need them, and ongoing interventions for all readers with word reading difficulties.
4. **Accommodations** (and modifications to curriculum expectations) should not be used as a substitute for teaching students to read. Accommodations should always be provided along with evidence-based curriculum and reading interventions. When students need accommodations (for example, assistive technology), they should be timely, consistent, effective and supported in the classroom.
5. **Professional assessments**, particularly psychoeducational assessments, should be timely and based on clear, transparent, written criteria that focus on the student's response to intervention. Criteria and requirements for professional assessments should account for the risk of bias for students who are culturally or linguistically diverse, racialized, who identify as First Nations, Métis or Inuit, or come from less economically privileged backgrounds. Professional assessments should never be required for interventions or accommodations.

## Broader equity issues affecting student outcomes

The OHRC assessed Ontario's current approach against these requirements. It also considered broader systemic issues related to these areas to determine if:

- There are consistent standards and approaches at the provincial and school board levels
- There is monitoring and accountability at the provincial and school board levels
- Boards and the province are collecting data to monitor individual student outcomes, support evidence-based decision-making, and analyze equity gaps based on disability; race; First Nations, Métis, Inuit ancestry; socio-economic status and other identity characteristics
- Boards are transparent in their communication with parents.

The OHRC also considered barriers faced by students with other disabilities and students from marginalized groups such as First Nations, Métis and Inuit students; Black and other racialized students; newcomer students; multilingual students; students from low socio-economic backgrounds; and students facing intersecting barriers (where several of these factors combine to create unique or compounded disadvantage).

## Recommendations

The OHRC makes specific recommendations to address these barriers, for example, to address the unique needs of First Nations, Métis and Inuit learners [**Recommendations 1 to 26, 120**] and multilingual students [**Recommendations 62, 118, 124**].

First Nation, Métis and Inuit children and youth experience unique challenges and barriers in accessing education. The ongoing legacy of residential schools; trauma; oppression, colonialism, racism and disadvantage; poverty (including inadequate housing, food insecurity and lack of access to clean water) and a lack of a feeling of belonging in school are some of the factors that have negative effects on First Nations, Métis and Inuit students' education, including their experience in learning to read.

The inquiry heard that many of the challenges faced by students with reading disabilities and their families are amplified for First Nations, Métis and Inuit:

- Navigating the education system is unnecessarily complex and difficult
- As in-school supports for students with disabilities tend to be limited, it puts the onus on parents to work with their children at home. This may be more difficult for First Nations, Métis and Inuit parents due to an intergenerational lack of literacy or reluctance towards the traditional school system
- The parents may themselves have learning disabilities that were never identified or supported
- First Nations, Métis and Inuit parents may have greater challenges supporting assistive technology accommodations
- First Nations, Métis and Inuit students may face barriers accessing services due to poverty, living in northern or rural locations and stigma.

While many of this report's findings and recommendations will support First Nation, Métis and Inuit students' right to read, particular attention needs to be paid to their intersectional needs to meet their substantive equality rights, treaty rights and their rights under international law (such as the United Nations *Declaration on the Rights of Indigenous Peoples*).



# Inquiry findings on reading outcomes in Ontario



## Key findings and recommendations

Quantitative and qualitative data gathered in the inquiry shows an urgent need to improve reading and other student achievement outcomes in Ontario. Too many Ontario students are not learning to read well. Reading achievement for Ontario students is concerning, but the outcomes for students with special education needs (excluding gifted), learning disabilities, boys, Black and other racialized students, multilingual students, students from low-income backgrounds, and Indigenous students are even more troubling.

With evidence-based word-reading instruction, many more children can learn to read proficiently and enjoy reading in the earliest elementary grades. Built on these foundations and incorporating evidence-based instruction in all components of literacy instruction, they can be meeting provincial testing standards in Grade 3 and 6 and the Grade 10 Ontario Secondary School Literacy Test. They can also get all the other benefits that come from having strong reading skills and comprehension. The assumption that some students – including students with disabilities – will never learn to read well is a form of ableism. It is used to justify maintaining systemic barriers instead of making changes we know will help all students learn to read.

Although the inquiry analyzed some quantitative data, there is a need for improved data collection, analysis and reporting on reading and other student achievement outcomes. EQAO reporting should be more transparent and include more detailed information about students with special education needs, including on their success rates and use of accommodations. Better data is needed to see if other students also experience inequality in reading and other outcomes, to identify and close equity gaps. There is little or inconsistent data at a school board or provincial levels on streaming and post-secondary participation. Other concerns with data collection are discussed in several sections of the report, particularly section 13, Systemic issues.

## Recommendations

The OHRC recommends improving data collection, analysis and reporting in several areas [**Recommendations 23 to 26, 55, 60, 63, 67, 81, 136, 137, 139 to 150**].

### The data confirms change is needed

The inquiry gathered quantitative and qualitative data on reading and literacy outcomes in Ontario. As school boards and the province do not collect other data on reading outcomes, the main source of quantitative data for the inquiry was EQAO reading test scores. The inquiry gathered qualitative data from a variety of lived experience accounts. Both the quantitative and qualitative data show more Ontario students are experiencing reading difficulties than should be.

With science-based approaches to reading instruction, early screening and intervention, we would expect to see only about 5% of students still below grade-level expectations on word-reading accuracy and fluency. However, in 2018–2019, 26% of all Ontario Grade 3 students and 53% of Grade 3 students with special education needs (students who have an Individual Education Plan (IEP), excluding students whose sole identified exceptionality is giftedness) were not meeting the provincial EQAO standard. Although the EQAO tests do not measure word reading accuracy and fluency separately, these significantly impact early reading comprehension. The results improved only slightly for Grade 6 students, where 19% of all students and 47% of students with special education needs did not meet the provincial standard.

The inquiry found similar results in the eight school boards. Far too many students with special education needs in these boards were unsuccessful on the Grades 3 and 6 2018–2019 EQAO reading assessments. When looking specifically at students identified with a learning disability exceptionality, in most boards, only about half of students with a learning disability exceptionality were able to meet provincial EQAO standards, even with a high rate of accommodations.

## The data doesn't show the true extent of the problem

The success rates on EQAO reading assessments are even more troubling when considering that most students with special education needs who meet the provincial standard use accommodations such as assistive technology to have the test questions read to them, and/or scribes to write down their answers. Accommodations are important and necessary for some students to access the curriculum and show their understanding of it. However, when looking at EQAO scores it is important to consider accommodations because when students use assistive technology or scribing, EQAO results do not tell us if those students can read or write unassisted.

Provincial and school board data from the eight inquiry boards shows that very few students with special education needs met the standard unaccommodated. For example, the International Dyslexia Association's (IDA) report *Lifting the curtain on EQAO scores* found that in 2018–2019, only 8.5% of Grade 3 students with an IEP achieved the provincial standard on the EQAO reading assessment without using assistive technology or scribing. This is consistent with the OHRC's findings from the school board data about students with identified learning disabilities. In 2018–2019, very few students identified with a learning disability exceptionality in the eight inquiry school boards met the provincial EQAO reading standard in either Grade 3 or 6 reading without accommodation.

The IDA report found little to no improvement in the unaccommodated pass rate for students with special education needs (excluding gifted) between 2005 and 2019 or for the reading achievement of all students in Ontario. The use of assistive technology and scribing accommodations has also been increasing over time.

In its 2018–2019 provincial report, the EQAO highlighted the underachievement of students with special education needs as a significant concern. It said:

The persistent discrepancy in achievement between students with special education needs and those without requires attention. EQAO data show that students with learning disabilities are the largest group in the cohort of students identified as having special education needs. Historically, students with learning disabilities have had a low level of achievement despite having average to above average intelligence. It would be beneficial to review supports available and strategies for success.

The EQAO data, which is already concerning, likely significantly under-represents the magnitude of reading difficulties among Ontario students. EQAO scores do not reflect whether the education system is equipping students to read independently.



## **Achievement gaps for Indigenous students**

Unique and compounded forms of disadvantage contribute to an achievement gap between First Nations, Métis and Inuit students and other students. Some gains have been made in recent years. However, using EQAO scores, credit accumulation rates and graduation rates as measures, students who have voluntarily identified as First Nations, Métis or Inuit are still behind other Ontario students.

Provincial EQAO data and data from the inquiry school boards showed that students who have self-identified as First Nations, Métis and Inuit were less likely to meet the provincial reading standard. Five-year graduation rates for self-identified First Nations, Métis and Inuit students in provincially funded schools are also lower than provincial rates for all students.

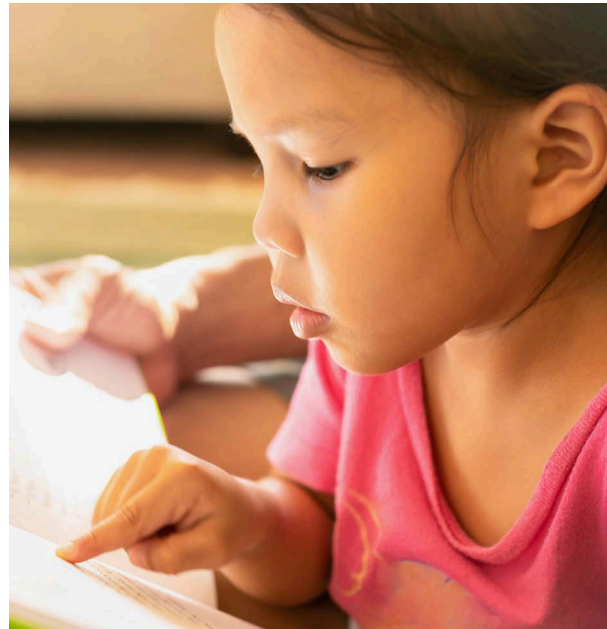


## **First-hand accounts that many students struggle with reading**

Qualitative data collected in the inquiry also included many examples of students failing to learn to read or only learning to read through significant effort and private services, where families can afford them. Students, parents, teachers and other professionals all provided examples of students many years behind in reading skills. Some students entering high school were reported reading at a primary level (Grades 1–3). Many educators acknowledged that this does happen and that when it does, the system has failed the student.



The EQAO also assesses students' engagement with reading using a student questionnaire. In 2018–2019, fewer than half of students (44% in Grade 3 and 42% in Grade 6) reported they like to read. A significant proportion (38% in Grade 3 and 33% in Grade 6) said they do not think they are good readers most of the time. This suggests that current approaches to reading are failing to teach many students to read, and to promote reading confidence and a love of reading in many more.



### **Inequities in other student success indicators**

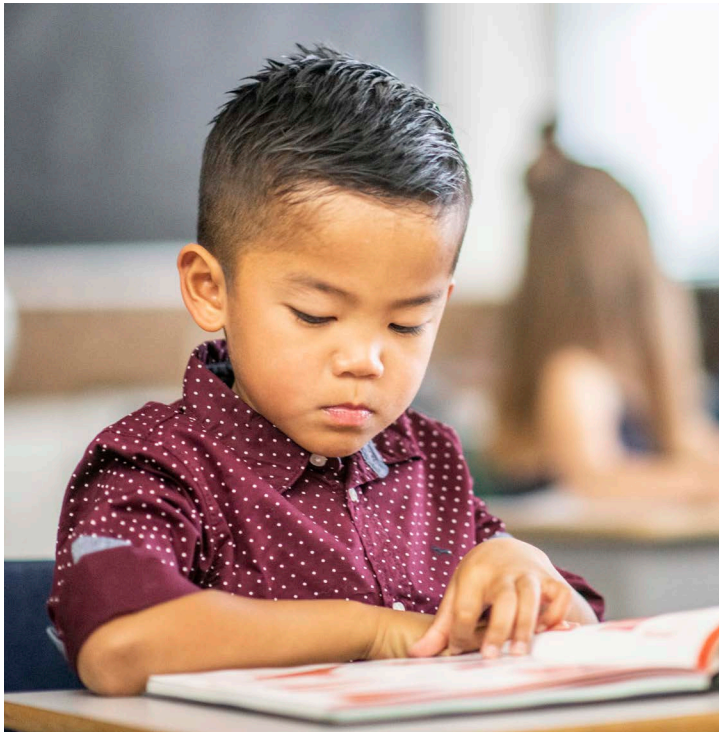
The inquiry examined other student outcomes and found areas of concern. For example, there have been longstanding concerns about marginalized students being disproportionately steered or streamed into applied or locally developed high school courses, instead of academic-level courses. This negatively affects the student's future academic pathways and opportunities.

School boards that collect and analyze demographic data have found that Indigenous, Black and Latin American students as well as students from lower socio-economic backgrounds are disproportionately represented in applied and locally developed classrooms. The inquiry found that students who have been identified with learning disability exceptionalities are also more likely to be streamed. In the inquiry boards, students identified with a learning disability exceptionality were about two to four times more likely to be taking mostly applied courses in Grade 9.

The inquiry also found that streaming happens in other ways and at a younger age. This includes placing students in special education classrooms where they do not receive appropriate interventions for their reading difficulties, or streaming them out of French Immersion programs instead of providing them with accommodations and interventions so they can remain in the regular classroom or in French Immersion.

The inquiry was unable to assess potential inequities in other student outcomes. The inquiry boards were not able to provide any or consistent data on student success outcomes, such as graduation rates and post-secondary participation, for students with identified learning disabilities or other identity characteristics. For example, although the Ministry publishes overall graduation rates by boards, boards do not consistently track potential inequities in graduation rates for historically marginalized students. Boards can only disaggregate graduation data for students who graduate from the same school district they started their secondary schooling in.

Due to a lack of data, the inquiry could not confirm if students with learning disabilities are more likely to leave school without receiving their diploma, a trend found in the research. Only one inquiry board provided a report that analyzed achievement data to measure progress in student learning and to help it identify strategies to improve student achievement and well-being. In terms of accumulating credits and graduating, the report found that specific groups of students, especially Indigenous students and students with special education needs, continue to experience unequal outcomes.



# Curriculum and instruction

## Key findings and recommendations

The goal of reading is to understand and make meaning from what is read. The evidence is clear that good reading comprehension requires being able to read words accurately and quickly, or automatically. It also requires good oral language comprehension, including strong vocabulary and background knowledge.

Strong word-level reading is a key foundational skill for becoming fully literate. It is also the skill where most students with reading acquisition difficulties struggle. Students with dyslexia, and many others, do not develop a strong foundation in word reading, setting them up for further academic struggles and potentially, a lower quality of life.

If classroom instruction is based on an evidence-based core curriculum, most students (80–90%) will learn to read words accurately and efficiently, and few students will need more intensive instruction or intervention. Decades of multidisciplinary research has shown that the best way to teach all students to read words is through direct, explicit, systematic instruction in foundational word-reading skills. Beginning in Kindergarten, this includes explicit instruction in phonemic awareness [the ability to identify and manipulate individual sounds (or phonemes) in spoken words], phonics (which teaches



letter-sound associations, also known as grapheme-phoneme correspondences and using these to “sound-out” words and to spell words). From about Grade 2, explicit instruction focuses on more advanced knowledge and skills, such as increased study of word structures and patterns (for example prefixes, word roots and suffixes), and how word spellings relate to one another. From beginning to teach these decoding skills, students also practice reading words in stories to build word-reading accuracy and speed.

Unfortunately, the current Ontario Curriculum, Language, Grades 1–8, 2006 (Ontario Language curriculum) and teacher education in Ontario’s faculties does not promote these highly effective approaches to early word-reading instruction. Instead, with few

**Decades of multidisciplinary research has shown that the best way to teach all students to read words is through direct, explicit, systematic instruction in foundational word-reading skills.**

exceptions, the main approaches in Ontario are teaching word-solving skills with the three-cueing system and balanced literacy. The three-cueing system encourages students to guess or predict words using cues or clues from the context and their prior knowledge. In balanced literacy (or comprehensive balanced literacy), teachers “gradually release

responsibility” by first modelling text reading, sharing text reading, then guiding students’ text reading, with the eventual goal of the student reading texts independently. These approaches for word reading are rooted in a whole language philosophy which suggests that by immersing children in spoken and written language, they will discover how to read. Given this philosophy, many of the other important literacy outcomes beyond word-reading skills may also not receive adequate explicit, evidence-based instruction.

With few small exceptions, Ontario students are not being taught foundational word-reading skills using an explicit and systematic approach to teaching phonemic awareness, phonics, decoding and word reading fluency. Even where boards or teachers are trying to be more intentional about using direct, systematic instruction, they are constrained by the current Ontario curriculum and emphasis on cueing systems and balanced literacy.

Many leading reading reports, teachers and teacher federations have recognized the need for teachers to be well prepared and supported to deliver an evidence-based core curriculum, including teaching foundational word-reading skills. Currently, teacher education and professional development places little emphasis on how skilled reading develops and how to teach word reading using direct and systematic instruction in foundational word-reading skills. Teachers also learn little about evidence-based early screening and reading interventions, or how to identify and effectively respond to struggling readers.



## Recommendations

The OHRC recommends the Ministry of Education work with an external expert or experts to revise Ontario's Kindergarten Program, Language curriculum and related instructional guides to remove use of cueing systems for word reading and instead require mandatory explicit, systematic and direct instruction in foundational word reading skills [**Recommendations 27 to 30**]. This should be done on an expedited basis while the Ministry and boards simultaneously take immediate steps to align their instructional approaches with the OHRC's findings and recommendations [**Recommendations 31, 33, 39 to 41**].

## Recommendations

The OHRC recommends that teacher education programs address the importance of word-reading accuracy and efficiency for reading comprehension; how accurate and efficient word-reading develops; how to teach foundational word-reading and spelling skills in the classroom and the importance of teaching foundational word-reading skills to promote equality for all students [**Recommendation 48**]. The OHRC further recommends that teacher education programs better equip teachers who are qualified to teach Kindergarten to Grade 6 to deliver the critical components of word-reading instruction and identify, instruct and support students with word-reading difficulties [**Recommendations 49 to 55**].

## Recommendation

The OHRC recommends the Ministry work with an external expert or experts to develop a comprehensive, sustained and job-embedded in-service teacher professional learning and resources that address reading instruction and how to identify, instruct and support students with word-reading difficulties [**Recommendation 56**].

## Recommendations

The OHRC recommends the Ministry provide adequate funding to implement these recommendations [**Recommendations 42, 43, 45, 57, 58**].



### **Curriculum and instruction are the foundation for reading success**

Science-based curriculum and classroom instruction are the foundation for meeting the right to read. In the education field, a widely accepted framework to support student success is a three-tiered approach to instruction and intervention (also referred to as Response to Intervention or RTI or a Multi-tiered System of Supports or MTSS). This approach is intended to maximize outcomes for all students, not just students with reading disabilities. Tier 1 is the core curriculum that all students receive in the classroom. Meeting the right to read requires high-quality tier 1 classroom instruction using an evidence-based, scientifically researched core curriculum. This would meet the needs of about 80 to 90% of students.

Teachers play a vital role in meeting the right to read. In 2003, Ontario's own expert panel on early reading said:

Teachers make a difference in the success of their students when they hold a fundamental belief that all children can learn to read and when they have the skills and determination to make it happen.

Teachers must have sufficient and ongoing professional development to deliver a high-quality science-based tier 1 core curriculum as designed. Many leading reports have stressed the importance of teachers being equipped with the skills and knowledge

to deliver evidence-based reading instruction, including that needed for teaching foundational word reading skills. The American Federation of Teachers (AFT), a union of education professionals, has recognized the importance of preparing teachers to deliver science-based reading instruction both for student outcomes and to empower teachers and support their professionalism and autonomy.

The AFT worked with Dr. Louisa Moats to publish a report, *Teaching Reading Is Rocket Science, 2020*, that translates the latest research in this area into information for educators. Several Canadian studies have shown the power of effective teaching to reduce the number of children experiencing reading difficulties. So, it is vital that faculties of education prepare teachers with these skills, and that teachers receive ongoing support and professional development.

### **Structured literacy is the most effective way to teach early reading**

There is an enormous body of settled scientific research on how children learn to read and the most effective way to teach them. Significant reports summarizing this research include reports from Ontario (the Ontario Expert Panel Report on Early Reading) and Canada (the Canadian Language and Literacy Research Network Report), as well as international reports (the National Reading Panel Report in the United States and the Rose Reports in England). The reports all endorse explicit and systematic instruction in the foundational skills that will lead to efficient word reading: phonemic awareness, phonics, including decoding and spelling words, and practice with reading words in stories to build word-reading accuracy and speed (structured literacy).

The goal of reading is to understand and make meaning from the text. The evidence is clear that one essential component of good reading comprehension is the ability to decode or read words quickly and efficiently. So, for students to understand what they read, they must learn to decode, to turn written words into



the corresponding spoken word. Learning to decode our alphabetic system requires knowing letter-sound relationships (grapheme-phoneme correspondences) and being able to apply that knowledge to blend the individual sounds together to successfully identify written words (decoding).

When students are explicitly taught and practice skills involved in decoding words, the process becomes quicker and with practice, supports automatic word reading.

Poor decoding skills act as a bottleneck to good reading comprehension. When a student must put a lot of time, effort and attention into reading words, it interferes with the flow of language in the text and uses up mental resources making it harder to understand what is read. Vocabulary and background knowledge, the ability to understand spoken language, and the use of reading comprehension strategies are all also critical aspects of reading development. Indeed, the National Reading Panel found critical roles for instruction in each of the Five Big Ideas in Beginning Reading – phonemic awareness, phonics, fluency, vocabulary and reading comprehension.

The best way for students to gain word-reading skills, beginning in Kindergarten, is with explicit and systematic instruction in phonemic awareness, phonics, and word-level decoding, learning grapheme-phoneme correspondences and how to use these to decode words, including blending sounds and segmenting words into sounds to read words and segmenting words into sounds to write words. Explicit instruction includes more advanced skills as children progress, such as studying word structure and patterns (for example prefixes, word roots, suffixes). This explicit, systematic approach based on reading science is also referred to as structured literacy.

## **Ontario’s current approach is based on ineffective cueing systems and balanced literacy**

Ontario’s Kindergarten Program, 2016 and Grades 1–8 Language curriculum, related Ministry guides for reading instruction, board resources, and teacher education provided by Ontario faculties of education emphasize teaching early reading skills using cueing systems for word solving and balanced literacy. Cueing systems encourage students to predict or guess words using cues or clues based on context or prior knowledge. In balanced literacy, or similar comprehensive balanced literacy approaches, teachers “gradually release responsibility” from modelling reading texts or books, to shared reading with students, to guiding students’ text reading, to students being able to read texts independently.

Cueing systems and balanced literacy for word reading are consistent with a whole language philosophy which assumes that children will “discover” how to read through exposure to spoken and written language. In these approaches, students receive little



or no direct, systematic instruction in the building blocks of written language such as phonemic awareness and phonics and how to use these skills to decode words. For example, in Ontario’s current system, it is more likely that a student will be encouraged to predict a word from a picture in the text or guess at a word from the sentence or story context and first letter rather than being taught the sounds that letters and letter combinations represent and how to use that knowledge to “sound out” the word.

Balanced literacy or comprehensive balanced literacy approaches, cueing systems and other whole language beliefs and practices are not supported by the science of reading. They have been discredited in many studies, expert reviews and reports on teaching all students to read words. Cueing systems and balanced literacy approaches are ineffective for teaching a significant proportion of students to read words, and may be most detrimental for students who are at risk. Students most at risk for reading failure, including students with reading disabilities and many students from other *Code*-protected groups, will not develop critical early reading skills when these approaches are used in schools.

When schools fail to teach students how to read words accurately and fluently, students will find it more difficult to understand and make meaning from what they read. They will be at greater risk of future academic difficulties and other negative consequences. Even students who can catch on to early reading when these approaches are used, may benefit in their fluency and spelling from direct and systematic instruction.

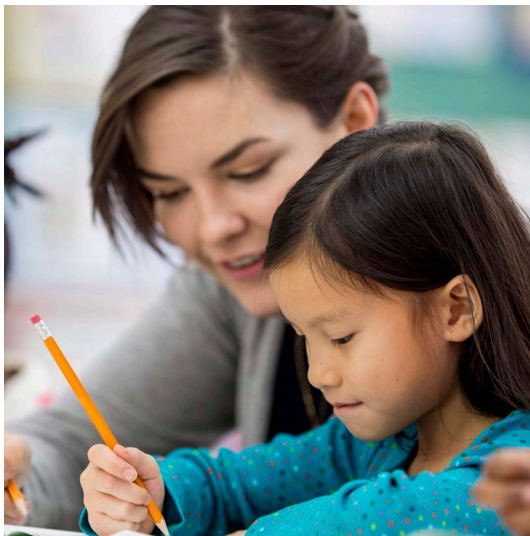
The current core curriculum in Ontario is the Language curriculum. It sets out what all teachers are expected to teach and what every student is expected to learn in each grade. The curriculum is an important tool for establishing mandatory requirements and consistency across the province. Pre-service and in-service teacher education and professional development is largely based on the Ontario curriculum.

The Ontario Language curriculum emphasizes the three-cueing system as the primary approach to teaching students to read words. It explains that this involves looking for clues to predict or guess words based on context and prior knowledge. The overall expectation for each grade is that students will be able to “use knowledge of words and cueing systems to read fluently.”

**When schools fail to teach students how to read words accurately and fluently, students will find it more difficult to understand and make meaning from what they read. They will be at greater risk of future academic difficulties and other negative consequences.**



Although it defines phonological awareness, phonemic awareness and phonics in a glossary, the curriculum does not require these to be taught, or provide guidance on how they should be taught.



The inquiry reviewed the literacy component of Ontario's Kindergarten Program as it relates to decoding and word-reading development and also found it lacking. The program does not pay enough attention to instruction in foundational word reading skills. There are references to phonological awareness, phonemic awareness and phonics in several specific expectations, but there is little discussion of the importance of these skills. There are no clear sets of reading skills that teachers are expected to teach and students are expected to learn. There is not enough information on teaching alphabetic knowledge and decoding skills, including no mention of daily phonics instruction. Also, the Kindergarten program does not discuss the importance of monitoring students' skills in these areas, or supporting students who are struggling in developing these early reading skills.



Ontario's teaching guides such as *A Guide to Effective Instruction in Reading, Kindergarten to Grade 3, 2003* also promote cueing systems as the main way students gain word-reading skills. The guides provide more detail about how cueing systems should be used. Although phonemic awareness, phonics and word study (which the *Guide* defines as an instructional activity where students practise recognizing high-frequency words and learn word-solving strategies) are mentioned, the focus is on three-cueing throughout. Even within the discussion of phonemic awareness, phonics and word study, guessing strategies are promoted.

Board-level resources also emphasize cueing-system and balanced literacy approaches. All boards reported following the Ontario Language curriculum and relying on Ministry resources, particularly *A Guide to Effective Instruction in Reading, Kindergarten to Grade 3, 2003*. The boards said that in addition to cueing systems, they use either a balanced literacy or comprehensive (balanced) literacy approach to teach early reading. In responses to the educator survey, most educators also identified balanced literacy as the predominant approach to teaching reading in Ontario.

With a few small exceptions, boards do not promote an explicit and systematic approach to phonemic awareness, phonics, decoding and word reading fluency. Few board resources referenced phonemic awareness or phonics. Where these were mentioned, there was not enough detail on how to teach and integrate them into an effective approach to early reading instruction. Teachers may deliver some short “mini lessons” on aspects of early reading skills, usually with small groups of students at the teacher’s discretion. However, this *ad hoc* approach is not the same as evidence-based tier 1 systematic and explicit whole class instruction in foundational word reading skills.

A few boards have recognized the need for more science-based early reading instruction. They have tried to incorporate more explicit instruction in some foundational skills. However, even where boards or teachers are trying to be more intentional about using direct, systematic instruction, they are constrained by the current Ontario curriculum and emphasis on cueing systems and balanced literacy. There are other barriers such as a lack of guidance on and consistent access to evidence-based teacher-friendly resources that would help teachers become knowledgeable about and implement a science-based approach in their classrooms. There are also significant issues with ongoing access to effective professional development.

The inquiry also found another barrier is that some people in the education sector are resistant to change and hold strong beliefs supporting whole language philosophies.

## **Teachers are not given sufficient education and support**

Currently, Ontario teachers are required to deliver a curriculum that is inconsistent with a science-based core curriculum that meets the right to read. They also learn very little about how skilled reading develops and how to teach word reading using proven approaches/structured literacy in their pre-service and in-service education and professional development.

Ontario faculties of education are required to prepare teachers to teach the Ontario curriculum and Kindergarten Program. The inquiry found that pre-service teacher education courses and in-service Additional Qualifications (AQ) courses in reading also focus on ineffective cueing systems and balanced literacy approaches (and discovery

and play-based approaches in courses about Kindergarten). There is little time or instruction on making sure pre-service teachers understand general language and early reading development.

Faculties also often emphasize socio-cultural perspectives and culturally responsive pedagogy. These are important in broader discussions about literacy and equity in education, but not a substitute for preparing teachers to deliver direct and explicit instruction in foundational word reading skills. This lack of a strong focus on scientifically supported early reading instruction may be harmful to many historically marginalized student populations and contradict the goal of promoting equity.

The inquiry found that teacher education programs and AQ courses on reading and special education include little about direct and systematic instruction in foundational word reading skills. Future and current teachers are generally not taught how skilled reading develops, including the importance of strong early word-reading skills for future reading fluency and reading comprehension. Teachers do not adequately learn how to teach phonemic awareness, phonics and decoding, and word-reading efficiency. They learn little about early screening to identify at-risk students and about evidence-based interventions. Even teachers who take AQ courses specializing in reading and special education are not learning these skills and how to identify and effectively respond to struggling readers. They are also learning very little, if anything, about reading disabilities and the term dyslexia is rarely used.

Boards said that new teacher graduates have little base knowledge about early reading instruction, so boards must provide this training through New Teacher Induction Programs. Many teachers confirmed they had not learned about effective reading instruction and reading disabilities in their teacher education program or AQ courses. They must seek out this knowledge elsewhere, often by spending their own time and money on research, resources and private training programs.

Boards and teachers also reported challenges with job-embedded professional development. They said that the province's approach to professional learning has shifted away from comprehensive, ongoing, in-person professional development. The inquiry heard that lack of funding and release time from teaching has hampered job-embedded professional learning.

The inquiry reviewed the boards' training on reading instruction and other inquiry areas such as screening, and found it focused mostly on specific board programs, resources or assessment methods that are inconsistent with science-based approaches. The knowledge and expertise to deliver professional development based on reading science is not often found within boards, so when training has been provided it has mostly been on ineffective approaches and programs boards are currently using. Two of the inquiry



boards appear to be trying to broaden their professional development and to support all Kindergarten to Grade 3 classroom teachers in explicit and systematic instruction in foundational word reading skills. However, this should not be left to the discretion of individual boards, and professional development should be consistent across the province. All Ontario boards will benefit from additional resources, direction and support from the Ministry.

Teachers told the inquiry they want a Language curriculum and professional development that will allow them to reach all students. They also want consistent approaches to teaching reading at the board, school and classroom levels. They said that they will benefit, and their students will benefit. Teachers don't want to see their students struggle and want to be empowered and supported in exercising their professional judgment to teach their students within an evidence-based and adequately resourced system. The findings and recommendations in this inquiry are consistent with that goal.



# Early screening

## Key findings and recommendations

A screening measure or instrument is a quick and informal evidence-based assessment that provides information about possible word-reading difficulties. It identifies students who are currently having or are at risk for future word-reading difficulties so they can receive more instruction or immediate intervention. All students should be screened using standardized evidence-based screening measures twice a year from Kindergarten to Grade 2.

Ontario does not currently have universal, systematic, evidence-based early screening to identify at-risk students who need additional instruction and immediate interventions. The current approach is inconsistent, ad hoc and relies mostly on non-evidence-based reading assessments. This leads to many at-risk students not being identified and receiving intervention early enough or at all.

Many students' reading difficulties are not being caught early, which has significant consequences. Age four to seven is a critical window of opportunity for teaching children foundational word-reading skills and is when intervention will be most effective. Many students who are not progressing as expected in reading are falling through the cracks and are not getting timely interventions and supports. Parents who express concerns are sometimes told not to worry as delays are developmentally normal or even expected for some students (for example, boys and students born late in the calendar year). These misconceptions further contribute to harmful delays as the longer schools wait, the harder it is to close reading gaps. Universal screening reduces the potential for misconceptions and biases to affect decisions about students.

Ontario must address its inadequate approach to early screening, which creates unnecessary conflict and confusion between school boards and teachers, and neglects the best interests of at-risk children. The research on screening for early reading skills is advanced, the financial cost is minimal and the impact of current practices on students is harmful.



## Recommendations

The OHRC recommends the Ministry of Education work with its external expert(s) to mandate and standardize evidence-based screening on foundational skills focusing on word-reading accuracy and fluency. The Ministry should require boards to screen every student twice a year from Kindergarten Year 1 (formerly known as Junior Kindergarten) to Grade 2 with valid and reliable screening tools, and provide boards with stable, enveloped yearly funding for screening. The tools that are selected should correspond to each specific grade and time in the year (in other words, they should measure expected knowledge for that grade and point in time in the school year). The selected screening tools should have clear, reliable and valid interpretation and decision rules [**Recommendations 59 to 61**].

## Recommendations

The OHRC recommends that the results of early screening be used to identify students at risk of failing to learn to read words adequately, and to get these children into immediate, effective evidence-based interventions [**Recommendations 60 to 62**].

## Recommendations

The OHRC recommends teachers be given adequate professional development to effectively implement screening [**Recommendation 66**], and given the necessary time to complete these assessments [**Recommendation 67**].

## Universal screening better ensures early identification and intervention

Along with science-based core curriculum delivered by adequately prepared educators, universal evidence-based early screening is a critical part of tier 1. This screening identifies students who are at risk for reading difficulties or are not responding to evidence-based instruction as expected, which means they are not gaining the required reading skills and knowledge. Early screening makes sure students are identified and receive the programming they need before they start to experience significant difficulties. If done properly and combined with evidence-based instruction

and interventions, early screening reduces the likelihood that a student will later need professional assessment by a psychologist or speech language pathologist. Although beyond the scope of the report, early measures can also be used to screen for difficulties in oral language development.

Screening should be universal. Every student should be screened using common and standardized evidence-based screening measures twice a year from Kindergarten to Grade 2. Evidence-based screening measures supported by research have strong internal and external validity, reliability, and have been linked to the science of reading instruction and how students acquire foundational reading skills. Many screening measures have been rigorously developed and studied, and validity and reliability for predicting risk for reading difficulties is known.

Students in each grade should be screened with specific screening instruments that will measure the expected reading development at that point in time. For example, Kindergarten screening should include measures assessing letter knowledge and phonemic awareness, but by Grade 2 screening should include timed word and passage reading.

Universal screening is important to protect the rights of all students, particularly students from many *Code*-protected groups. Mandatory instead of discretionary screening reduces the risk of bias in assessment or selecting students for interventions. It reduces the risk that students will fall through the cracks. Universal evidence-based screening ensures better decisions about which students need additional support and ultimately improves student outcomes. Data collected from screening is also valuable for board planning. Boards can compare results from common screening tools across schools or groups of students and direct resources where they are most needed.

## **Barriers for students learning in French**

All students can learn French given the appropriate supports. However, the inquiry heard that students with reading difficulties do not receive equal access to French-language education. French-language rights-holders reported giving up their right to have their child receive a French-language education and moving their child to an English board because French boards have fewer resources and programs for reading difficulties. Students may be discouraged from enrolling in French Immersion, or be encouraged to withdraw, due to misconceptions that students who struggle to learn to read should not learn English and French at the same time. Some parents reported being told the school board does not offer supports such as accommodations and interventions in French Immersion.

A preventative approach is also needed for students learning in French and at risk for reading disabilities. Early scientifically validated screening and evidence-based interventions should equally be implemented within French-language instruction.

## **Ontario’s approach to early screening is failing many students**

As currently interpreted, the Ministry of Education’s Policy/Program Memorandum (PPM) 155 is a significant obstacle to universal early screening. PPM 155 leaves the frequency, timing and selection of students and screening instruments to each teacher’s professional judgment. It prevents boards from requiring that all students be screened at certain times of the year with a common evidence-based screening instrument. This has led to inconsistencies and gaps and a lack of an effective, student-centred approach to early screening. It has also limited boards’ ability to collect data centrally and use it to make decisions.

The inquiry found that screening practices vary by board, school or teacher. There are also significant issues with current screening approaches which compromise the effectiveness of the school boards’ tiered approaches. A teachers’ association representative said the current approach to who gets screened, when and how is based on “a huge amount of luck.”

Most school boards are not implementing universal screening measures at several points in time from Kindergarten to Grade 2. Typically, screening only happens once, usually in Kindergarten Year 2 (formerly known as Senior Kindergarten). Not all students are screened as some educators only screen students they believe are struggling.

When screening happens in Year 2 it is most often with tests that only measure letter-name or letter-sound knowledge and/or phonological awareness. Only some aspects of phonological awareness are typically evaluated. These skills are very early pre-literacy skills, and only some of what should be assessed. Boards often mistakenly believe these basic Year 2 screeners are complete screening assessments of all the knowledge and skills for word-reading acquisition. A few boards re-administer the same screener or a slightly different one that sometimes includes some more advanced skills at a second and/or third point in time to the same students who performed poorly the first time. This misses students who performed well when screened on early literacy skills, but later struggle with more advanced skills such as reading accuracy or fluency.

After Kindergarten, boards typically assess students using reading assessments associated with commercial reading programs that align with three-cueing and balanced literacy instructional approaches. These are not evidence-based screening instruments. Teachers typically use observational tools such as a miscue analysis or running record

where a student reads aloud from a levelled reader and the teacher observes the student's reading behaviours including the words they read correctly, how they are using the three-cueing system to predict words, and their mistakes. These methods are not useful measures. They only tell the teacher if the student is significantly below grade level in their ability to read levelled readers, not how the student is progressing on foundational word reading skills. These assessments fail to identify many children at risk for word-reading failure.



**Ontario needs to standardize early screening and make it universal and based on the reading science.**

Some boards did include evidence-based screening tools on their lists of “approved” screening tools. However, because of PPM 155, there is no guarantee that teachers will pick these assessments and boards could not confirm if they are being used. Some boards use board-developed assessments which have some good components but not all necessary elements, and they do not appear to have been adequately assessed to make sure they are effective.

The inquiry also found that boards could not provide clear information about how the results of screening are used, or do not know the best way to respond to the information from screening.

### **Establishing a standardized approach for universal evidence-based early screening**

Ontario needs to standardize early screening and make it universal and based on the reading science. This includes stipulating that all students must be screened, when, how often, and with what screening instruments. Educators and other school professionals such as board speech-language pathologists and psychologists should be an integral part of developing this approach.

Educators administering the screening should be given adequate professional learning on the basic principles of early reading screening measures and knowledge about the specific tools that will be used. Experience from other jurisdictions that have implemented successful early screening programs indicates screening students takes 10–15 minutes per student. Educators must be given adequate time to do this important work, including recording the data from screening.

The screening tools selected should be standardized for consistency, and must be evidence-based, include the appropriate measures for each grade, and be administered to every student twice a year from Kindergarten to Grade 2. Boards should use a consistent system to record each student’s screening results. The results should be used to identify and provide immediate intervention for students who need it. Collecting data on early screening is also very important, but the data should not be used for performance management or to blame educators for issues related to reading. Boards must also be very careful not to use or report the data in a way that stereotypes or further marginalizes any student, group of students or school.

Communicating with parents is also a key part of successfully implementing early screening. Parents must understand that the screening is universal, their child is not being singled out, and the purpose of screening is to see if their child may need further supports or interventions. Some parents may be concerned that screening could lead to their child being labelled or stigmatized. Boards must explain that screening helps avoid the risk of a student developing a reading disability or needing more intensive special education supports later on.

Screening is an essential part of a systematic and comprehensive approach to meeting the right to read. The earlier we identify students needing more targeted instruction and intervention in foundational word-reading skills, the better. Investing the time and effort to conduct universal early screening and implement interventions will reduce the need for more costly and intensive services in the long run. Students will have better outcomes and educators will be better off when they have reliable and useful information about their students and are in a better position to respond.





# Reading interventions



## Key findings and recommendations

Many more students will learn to read if we change our current approaches to classroom reading instruction, screen all students and then provide early and tiered evidence-based interventions. Ontario's approach to reading interventions is deficient resulting in many students failing to learn foundational word-reading skills. When this happens, our education system has failed these students.

Many more students need reading interventions because classroom instruction in word reading is not based on reading science. The need for reading interventions exceeds the available spots. So, many students never receive these interventions in school or receive them far too late.

Intervention is most effective when delivered in Kindergarten and Grade 1, and no later than Grade 2. Yet, in Ontario the most effective interventions are only available, if at all, after Grade 3 or much later. Boards' first response to struggling readers is often to provide more of the same ineffective reading instruction that has already failed the student, but in smaller groups or one-on-one. If a more formal intervention program is available in the earliest grades, it is almost always one of the several ineffective



commercial programs that do not have a solid research base in building foundational word reading skills. A critical window of opportunity begins to close, and students fall further and further behind.

There are a few exceptions where boards do have good programs for the youngest students, but once again, demand outstrips supply. The lack of consistency between boards and schools is concerning. Good early intervention programs should be available to all students, regardless of where in Ontario they go to school or which school they attend in a board.

There are some good intervention programs in the older grades, typically after students have struggled and fallen behind for many years. However, boards appear to lack a systematic and fair way for selecting students. Parents who can advocate or can pay for a private psychoeducational assessment are more likely to secure a spot for their child. Although boards may have some measures to assign students to programs, they are typically problematic such as requiring the student to be several years behind based on unreliable book-reading levels. Many students' needs go unmet due to limits on how many can be offered reading interventions.

### Recommendation

Ontario needs to decrease the need for reading interventions by using explicit, systematic instruction in foundational word reading skills in the classroom while simultaneously increasing access to proven interventions beginning in the earliest grades. To do this, the OHRC recommends the Ministry of Education work with an external expert or experts to select appropriate early (Kindergarten and Grade 1) and later (Grades 2, 3 and onwards) interventions that school boards must choose from. These interventions should be evidence-based and include systemic, explicit instruction in phonemic awareness, phonics and building word-reading accuracy and fluency [**Recommendation 69**].

### Recommendation

The OHRC recommends school boards immediately stop using reading interventions that do not include these components or have a strong evidence base for students who struggle with word reading, and students at risk for or identified or diagnosed with reading disabilities or dyslexia and only use interventions from the Ministry's list [**Recommendation 70**].

## Recommendations

To increase and standardize access, the OHRC recommends school boards make sure every school has at least one evidence-based tier 2 and tier 3 (more intensive than tier 2) reading intervention for students in each grade who need them [**Recommendation 73**]. This will require additional stable, enveloped yearly funding and implementation support from the Ministry [**Recommendations 68, 80 and 83**] and adequate professional development and support to make sure there are knowledgeable and skilled educators who can deliver these interventions [**Recommendations 83 to 85**].

## Recommendations

The OHRC recommends removing inappropriate eligibility criteria for interventions, such as requiring a learning disability diagnosis or that the student not have a co-existing disability [**Recommendations 75 to 78**]. Instead, the Ministry should work with external expert(s) to develop consistent research-informed student selection criteria for interventions based on standardized reading test results. To ensure equitable access, ANY student who meets the criteria should receive interventions [**Recommendations 71, 72, 75 to 78**].

## Recommendations

The OHRC recommends making improvements to monitoring individual student progress and overall effectiveness of intervention approaches [**Recommendations 81 and 82**].

## Key components of effective reading interventions

Early, evidence-based interventions that are fully implemented and closely monitored are highly effective in reducing the number of students who fail to learn to read. Students in all grades from Kindergarten to high school should have access to effective interventions for reading difficulties, although early intervention is best. With effective classroom instruction and early intervention, fewer students will need interventions in the later grades, when they are less effective. Any student who struggles should have access to interventions regardless of whether they have been identified with a reading disability.



Evidence-based reading interventions represent tier 2 and tier 3 in a tiered approach to supporting students with reading difficulties. Tier 2 reading interventions are for the approximately 15 to 20% of students who may still struggle with reading after receiving tier 1 science-based instruction. These students receive tier 2 support in smaller groups with increased intensity.

Evidence-based tier 2 interventions in Kindergarten and Grade 1 will be effective for most students. Tier 3 supports are intended for the very small percentage who do not respond as expected with tier 1 instruction and tier 2 intervention. These students are at high risk for failing to learn to read words adequately, or have already experienced time in the classroom without being able to meet the reading demands. Intervention at this level means smaller groups or individual interventions of increased intensity.

Interventions generally occur daily in focused blocks of time. The main difference between tier 2 and tier 3 interventions is their intensity, duration and frequency.

At tier 2, evidence-based interventions/programs must explicitly target the foundational skills of sound-letter knowledge, phonemic awareness, decoding skills and word-reading accuracy and fluency. These areas will be consistent with areas taught in evidence-based tier 1 classroom instruction for foundational word-reading skills. Tier 2 should be implemented with small groups of students, with sufficient time and intensity. Later interventions should also focus on more advanced word-reading skills (including more advanced orthographic patterns, syllables and morphemes) and strategies.

Tier 3 should either use approaches that incorporate more intensive use of tier 2 intervention programs, or more specialized programs. Tier 3 should include more explicit instruction and scaffolded practice, enough cumulative review to ensure mastery of the skills, and more time in the intervention.

Other key components of a successful tiered approach include:

- Clear and appropriate decision-making rules for choosing evidence-based programs for classroom instruction and tiered interventions, and for matching students to intervention programs (for example, using standardized scores on assessments of foundational word-reading skills, rather than vague language about being “significantly” below grade level in reading)
- Valid and reliable progress monitoring and outcome measures for interventions
- Clearly identified rules and guidelines for decisions on individual students, at each point within the multi-tiered system
- Distributing interventions to make sure all students have access to effective interventions
- Rigorous methods for making sure an intervention is delivered as intended, including how and when the intervention is delivered, and for evaluating the program (for example, standardized word-reading, fluency and comprehension measures)
- Adequate resources to implement the interventions, and quality professional development and ongoing coaching for teachers.

Strategies learned in effective intervention programs must be supported and reinforced in the classroom. Once interventions have ended, students will not continue to develop the necessary skills if classroom practices are not evidence-based.

No single reading intervention will completely address every student’s reading difficulties. Approximately 3–5% of students will have word-reading problems that are less responsive to even effective interventions. School boards must have evidence-based interventions at each tier to help reach all students.

## **Ontario’s failure to provide science-based classroom instruction results in more students needing intervention**

Currently in Ontario, many young students need interventions because classroom instruction is based on three-cueing and balanced literacy instead of structured literacy approaches. Many more students need intervention than would otherwise, and there are not enough spots for everyone. This greater need for interventions than availability contributes to a “wait and see” approach where boards wait to see which students fall furthest behind and thus appear to most need intervention. This “triaging” due to limited spots means that students who get interventions often get them too late, and many students never get access to the tier 2 and 3 supports they need.

## **Boards’ earliest interventions are mostly ineffective programs**

The first approach to struggling readers is typically to increase guided reading in the classroom. If the student still struggles, boards provide vaguely defined “extra reading support” or ineffective commercial programs. These programs often use the same instructional approaches used in classrooms, just in a smaller group or one-on-one setting. There are better programs that have a research base. Providing ineffective programs delays student progress.

A few boards have developed their own isolated approaches to intervention, but these are incomplete and *ad hoc* and have not been adequately evaluated to be confident they are effective.

A few inquiry boards reported some access to good programs as their earliest interventions. For example, one board reported starting to use an evidence-based program for some students in Kindergarten and Grade 1. Two other boards had some access to such programs before Grade 3.

## **A lack of provincewide consistency means uneven access for students**

The Ministry of Education does not mandate any approaches to intervening when students are not developing foundational word-reading accuracy and fluency. School boards decide which reading intervention to use, in which grades to provide the interventions, eligibility criteria, and if and how to track student progress. Sometimes boards delegate this responsibility to individual schools.

The inquiry boards reported having at least 16 different commercial interventions, only five of which were evidence-based. However, two of these evidence-based interventions were seldom used. There were six board-developed interventions, but none of them had been rigorously evaluated or included the scope of skills needed to address early or later reading difficulties.

## **Evidence-based interventions are available but there are issues with timing, access and implementation**

Boards are using some evidence-based interventions and some parents reported good results. However, these interventions are often provided too late. Research has clearly shown the benefits from intervening earlier. Students make the most gains when they receive interventions in the earliest grades. After Grade 2, students who are behind in word reading fall further behind their peers who are more successful at reading words fluently and efficiently, and it becomes harder to address these critical skills. When students with weak reading skills do not receive effective early interventions, it is very likely they will continue to have accuracy and/or fluency difficulties throughout their school years.

Most boards are not providing tier 2 or tier 3 evidence-based interventions until Grade 4 and above and sometimes not until Grades 6 to 8. By this time, a critical window of opportunity is lost and it will be much harder to catch these students up.

The inquiry found that even where good programs are available, access is limited and varies widely. There are not enough spots for all students who need them, or they are only available in some schools. Some schools may have access to programs but do not deliver them. School boards and schools often do not have the funds to buy interventions or to provide adequate professional development and coaching for educators to deliver them. Having sufficient staff who are skilled to deliver an evidence-based program is one of the essential components of effectively implementing tier 2 and tier 3 interventions.

Even when boards deliver evidence-based interventions, the full program, including the earliest interventions, may not be available in all schools. In some boards, only a relatively small percentage of schools were delivering early interventions (for example, only 30–40% of schools). One board did not have any evidence-based interventions for students until Grade 5.

The inquiry also heard that students in an intervention program may not receive it as intended (for example, only receiving it a few days a week instead of every day or not receiving the full program).



Generally, boards do not have clear procedures or valid, objective criteria for selecting students for interventions. Most boards rely partly on unreliable or invalid assessments to determine who receives interventions. These assessments look at students' book-reading levels at certain points in each grade (which are unreliable for assessing students' foundational word-reading skills).

Boards also set cut-offs that may not be valid, such as the student having to be a certain number of years behind in their reading. Both educators and parents told the inquiry that the selection process is unsystematic, with parents' ability to advocate often determining whether a child is selected. Although all but one board said that psychoeducational assessments are not required, the inquiry heard that they often do help secure an intervention. Of concern, one inquiry board requires an assessment and learning disability diagnosis and others give preference to students who have this, which makes interventions inaccessible to many students. Current approaches to student selection are susceptible to bias and inconsistent implementation. Finite resources mean that not all students who need interventions can receive them.

### **Better student progress monitoring and program evaluation**

School boards are not adequately monitoring individual student progress or the overall effectiveness of intervention programs. This data is needed for decisions about individual students, and at the board level.

Ontario boards do not currently have a consistent system to measure students' response to the intervention, or to monitor long-term effects. School boards should collect valid and reliable data on students' immediate and long-term outcomes, to inform their decisions about individual student programming. For example, reliable information about response to interventions should be used to determine if a student needs more intensive interventions or referral for a professional assessment.

Boards are not using reliable and valid methods to examine the effectiveness of interventions. Most boards reported assessing a student's book-reading levels before and after an intervention. This is a problematic approach for gauging progress in an intervention. Instead, standardized measures of multiple aspects of reading should be used.

Reliable data on progress and outcomes for an intervention should also be tracked and analyzed at a system level, but this not consistently happening. Many of the same issues with student progress monitoring also apply to how school boards examine program effectiveness. Boards need better data, based on standardized reading measures and not book-reading levels, to understand which intervention programs are leading to

successful outcomes, for which students, and in which schools. For example, a program that was promising may not be having good effects across most schools, or a family of schools may be getting exceptional results with a certain intervention and could offer lessons about implementation procedures for the board or province.

## **Knowledge about evidence-based approaches to intervention needs to be translated into practice**

It is not enough to recognize the importance of a tiered approach to intervention. The actual approach must be consistent with what many studies and reports have shown works best. Ontario's education system acknowledges the importance of evidence-based tiered approaches, but much still needs to be done to translate this into sound practice.

Access to evidence-based tiered early interventions for word-reading accuracy and fluency in school is an equity issue. Many parents who can afford it have given up on the public education system and are paying for private services. Students who come from families who can't afford to pay or do not have good private services in their communities must navigate a complex system to try to find out whether their school offers an intervention, and if so, how to advocate to have their child placed in it. Even

then, the intervention offered may not be evidence-based.

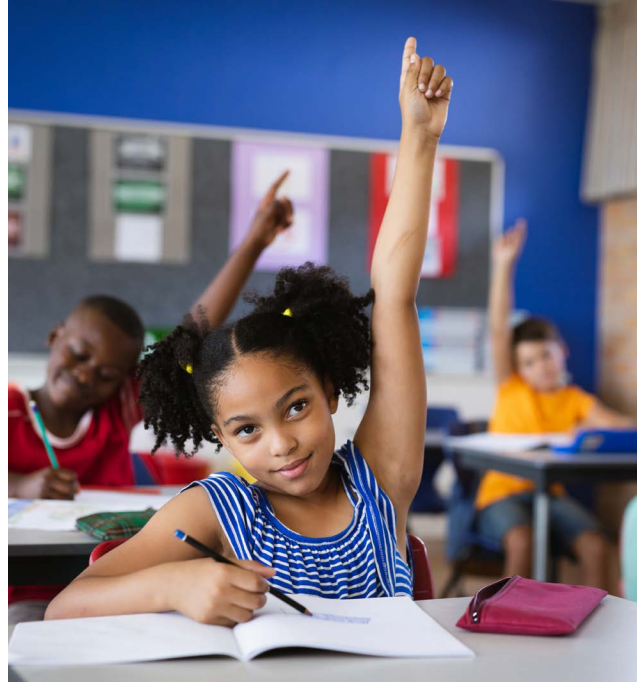
**Access to evidence-based tiered early interventions for word-reading accuracy and fluency in school is an equity issue.**

There are better ways to ensure equitable access to word-reading interventions for struggling readers. There have been some positive developments in recent years but there is a lot more work to do. There are

clear steps that Ontario can take to meet the needs of students who struggle to learn foundational word-reading skills. Providing evidence-based interventions at every tier to all who need them will lessen the short- and long-term burdens on students, families, educators, and ultimately the education system. It will help reduce the need for accommodations and professional assessments.



# Accommodations



## Key findings and recommendations

Systematic, explicit instruction in foundational word-reading skills supplemented with evidence-based interventions for students who require more support to learn to read will result in many fewer students needing accommodation. Providing accommodation should never be a substitute for the goal of teaching all students to read, but where students need access to accommodation it should be timely, effective and supported.

Schools should be proactive in identifying students' accommodation needs and providing accommodation without delay and the need for parent or student advocacy. Accommodations should be implemented consistently by all teachers and seamlessly when a student transitions from one school year to the next or to a different school. There should be better communication with parents about accommodation, so they know if and how their child's accommodation needs are being met.

Modifications are not the same as accommodations as they change curriculum expectations for students. Modification to expectations from a lower grade means that students may never be able to get back to working at grade level. This negatively affects their future academic pathways (for example, limiting their ability to take academic-level high school courses). Modifications should only ever be used when all other steps have been taken to make sure students can meet grade-level curriculum outcomes. Parents (and students, where appropriate) should be fully aware of the modifications and the potential impact of modifying the student's curriculum expectations.

## Recommendations

While accommodations are provided at the school board level, the Ministry of Education has an important role in setting standards and ensuring consistency across Ontario. The OHRC recommends the Ministry work with external expert(s) to revise its program planning and professional development policy documents to provide greater guidance on the appropriate use of accommodations and modifications [**Recommendation 86**]; establish a list of effective and accessible assistive technology products and training that is required on each [**Recommendations 91 and 92**]; make it easier for students to access and use assistive technology [**Recommendations 91, 93 to 97**] and set standards for IEPs [**Recommendations 104 to 107**].

## Recommendation

The OHRC recommends the Ministry evaluate existing funding structures and levels to make sure there are sufficient resources for timely and effective accommodation [**Recommendation 90**].

## Recommendations

The OHRC recommends school boards (and the Ontario College of Teachers, as appropriate) make sure educators receive training related to accommodation and modification and the use of assistive technology [**Recommendations 87 to 89, 90, 92, 97**]. The OHRC further recommends that school boards make several changes to current approaches for better transparency and accountability around accommodations and modifications [**Recommendations 102 to 110**].

## **Accommodations are not a substitute for teaching students to read**

The primary purpose of accommodations is to provide students with supports so they can access the curriculum across subjects and show what they have learned. Accommodation must be provided along with, and never in place of, evidence-based curriculum and interventions. However, within the current system, accommodations such as assistive technology are often being used in place of making sure all students learn to read using a science-based core curriculum and instruction and early, tiered evidence-based interventions. Even still, there are issues with students' access to timely and effective accommodation.

Implementing this report's recommendations will make sure many more students can read unassisted. However, some students may still need to be accommodated to have meaningful access to education as required under the *Code*.

A common accommodation for students with reading disabilities is assistive technology. This can be a device, piece of equipment, software or system that helps students access grade-level curriculum. Access to the curriculum means that students can take in and understand the material being taught in school, understand and complete assignments, and show what they have learned. Other typical accommodations include extra time for tests or assignments, teaching and assessment strategies (such as breaking tasks down into smaller components) and assistive services such as a note-taker or scribe (someone who writes down answers dictated by the student).

## **Modifications are different than accommodations and should be used sparingly**

The goal of evidence-based reading instruction, interventions and accommodations is always to make sure a student is working at grade level. However, in rare cases, it may be necessary to modify grade-level expectations for a subject or course to meet the student's learning needs. This may involve developing expectations that reflect the knowledge and skill for a different, typically lower, grade level in the curriculum or reducing the number of grade-level expectations. Accommodations help students meet curriculum outcomes; modifications change curriculum outcomes.

Modification to lower grade-level expectations must be used very cautiously, and only as a last resort after all possible interventions and accommodations have been tried. Modification has long-term consequences for the student. They may never catch up with their peers who are working at grade level and may be streamed into applied and locally-developed high school courses as a result, limiting their future education opportunities.



## Issues with meeting the duty to accommodate in Ontario's education system

There are accommodation success stories. Some students are receiving effective accommodations to allow them to access the curriculum. The inquiry heard about the power of good accommodation approaches to reduce stress and mental health issues and allow students to be and feel successful in school. Boards have largely moved away from only accommodating students who have been through an IPRC process, and are being more flexible in providing accommodation to all students who will benefit. Increased access to technology in the classroom can be a good inclusive design approach, and some boards are prioritizing training educators, students and parents on how to use technology.

However, the inquiry heard from educators, parents and students about many challenges and shortcomings with accommodation. The most significant concern is the over reliance on accommodations as a substitute for teaching all students to read. For example, the inquiry heard of struggling readers in Grade 1 being given assistive technology instead of evidence-based early reading instruction and interventions. Substituting technology for science-based reading instruction and intervention is simply unacceptable.

Educators described how a lack of access to human and material resources hampers their ability to accommodate. They said they deal with many things in the classroom and would benefit from extra support to better meet the accommodation needs of all their students. They described spending time and energy to fight for resources to support their students and even spending their own money to purchase materials.

Parents described difficulties getting schools to even acknowledge the need for accommodation and then to put an accommodation plan, or IEP, into place. Many said they were only able to get this through persistent advocacy or obtaining a private professional assessment. They reported delays in their child receiving accommodation, inconsistent implementation of accommodation, and being told their child is doing "well enough" without accommodation, even though accommodation would help the student reach their full potential. They often did not know whether their child was actually receiving accommodations identified in their IEP and how well they were working. A common concern was that schools provided accommodations for EQAO testing but these were not always extended to support the student's everyday learning. Parents also reported being told their child could not have accommodations or interventions in French Immersion and would have to transfer to the English stream to receive supports.

**Students described their own accommodation challenges, such as having to self-advocate to have teachers implement accommodations, being bullied or stigmatized for needing accommodations, and even being told by educators that they were “faking” or that accommodations are a form of “cheating.”**



Students described their own accommodation challenges, such as having to self-advocate to have teachers implement accommodations, being bullied or stigmatized for needing accommodations, and even being told by some educators that they were “faking” or that accommodations are a form of “cheating.” They said they did not always have enough training on how to use the technology they were given, and described situations where their technology had to be shared among many students or did not work.

A persistent theme was how difficult it is for students and parents to navigate the system. There appeared to be a direct relationship between parents’ ability to strongly advocate and access resources (such as private professional assessments and even lawyers) and their child’s access to accommodations. This raises significant equity issues as families from historically marginalized backgrounds such as being racialized, Indigenous, living with disabilities, being a newcomer or lacking fluency in English or French or having lower income may not be in the same position to get and monitor accommodations.

Parents described agreeing to modifications to their child’s curriculum expectations without knowing that their child may never be able to catch up and that their child’s later educational choices would be affected. Several boards agreed there may be a tendency to modify rather than provide necessary interventions and accommodations, so schools will not have to tell parents their child is not meeting grade-level expectations.

## The way forward to meet the duty to accommodate reading disabilities

To meet the right to read, accommodation must give students with reading disabilities meaningful access to the education all students receive. Accommodation must be timely, as accommodation delayed is accommodation denied. It should also be consistent from class to class, year to year and when the student transitions to another school. Students should not be expected to self-advocate to receive their accommodations, nor should parents have to become involved to make sure their child receives the needed supports.

Accommodations should address any intersecting needs, for example from other disabilities. They should respect dignity and privacy and not isolate students. Students may feel uncomfortable with accommodations that single them out among their classmates, so schools should be sensitive to this and take proactive steps to prevent any bullying or stigma associated with receiving accommodation.

There is a need for greater standards and guidance on accommodating reading disabilities within Ontario's education system, including how accommodations and modifications should and should not be used, and which assistive technology resources are accessible and effective. School board communication with parents and students around accommodations can be improved and boards should provide an accessible complaints process to resolve any concerns.

Whenever modification must be considered, parents (and the student, where appropriate) should be aware of how the student's expectations are being modified and the potential ramifications. At the same time as modifying curriculum expectations, schools should provide evidence-based interventions and suitable accommodation to try to bring the student to the point where they can meet grade-level expectations.

Better professional development, ongoing coaching and resources for educators are also critically important. Educators are often doing their best but are stretched thin. Helping them understand how best to accommodate and providing them with the needed support will help make sure the duty to accommodate is better fulfilled.



# Professional assessments

## Key findings and recommendations

Ontario's current approach to teaching word reading and responding to these reading difficulties needlessly contributes to increased demand for costly professional assessments. Many students will not need professional assessments for dyslexia within a system with science-based classroom instruction, screening beginning in Kindergarten for potential reading difficulties, and evidence-based tiered interventions in the earliest grades. The few students who do still have word-reading difficulties and need professional assessments, for example by board speech-language pathologists and psychologists, should have timely and equitable access. A professional assessment should never be required for a student to receive accommodations or interventions.



School boards lack clear, consistent criteria for deciding when to refer students with suspected reading disabilities for board professional assessments. The referral process is highly discretionary, and due to limited resources, only some students who need an assessment are referred, often based on boards' assessment of "priority of need." As a result, there is a high risk of bias and unfairness in selecting students for a board professional assessment. Many students are never referred and are only assessed if their families can afford costly private assessments.

The one consistent criterion most boards use is requiring a student with a suspected reading disability be in at least Grade 3 before being considered for a psychoeducational assessment. This type of age/grade level requirement is problematic and inappropriate. Instead, referral for assessment should be based on response to intervention. Any student who has not responded appropriately (based on standardized reading test scores) to a period of classroom instruction and evidence-based early intervention should be referred for assessment. This may happen as early as late Grade 1.

Delaying referral for assessment until at least Grade 3 combined with wait times for assessments means that many students do not get assessed until Grades 4, 5 or later. There are currently long wait times for board professional services, particularly psychoeducational assessments. Few boards maintain centralized waiting lists, track average wait times or take steps, such as redeploying resources, to make sure students are not waiting too long. This directly contradicts the Auditor General of Ontario's 2018 recommendations for what boards should be doing to ensure timely and equitable access to professional assessments.

The Ministry's current definition of learning disability (which includes a reading disability) is not consistent with up-to-date research and the DSM-5 requirements for diagnosing a learning "disorder," including dyslexia. It also states that students do not have a learning disability if their learning difficulties are because of "socioeconomic factors; cultural differences; [or] lack of proficiency in the language of instruction." However, these factors are not acceptable reasons for students to fail academically, although due to a culture of lowered expectations, some students' struggles may be seen as inevitable or beyond the control of the education system.

## Recommendations

The OHRC recommends that the Ministry of Education immediately update its definition of learning disability to be consistent with the criteria in the current DSM-5 and address any potential bias [**Recommendations 111 and 112**].



## Recommendations

The OHRC recommends school boards develop clear, transparent, written criteria and processes for referring students with suspected reading disabilities for psychoeducational assessment based on their response to intervention, and not a minimum age/grade [**Recommendations 113, 119, 123**]. The criteria should make sure that multilingual students, culturally diverse students, racialized students, students who identify as First Nations, Métis or Inuit, and students learning in French Immersion have equal access to assessments [**Recommendations 117, 118, 120, 124**].

## Recommendation

A psychoeducational assessment must never be required for accessing interventions or accommodations [**Recommendation 125**].

## Recommendations

The OHRC recommends boards better manage wait times and track professional assessments to make sure they are being completed in an equitable and timely way [**Recommendations 127 to 129**]. Any student who needs an assessment should have access and any limits on or barriers to assessment should be removed [**Recommendations 121 and 122**]. The OHRC recommends the Ministry provide sufficient, stable, enveloped, yearly funding to make sure boards can implement the recommendations related to assessment [**Recommendation 130**].

## Reducing the need for professional assessments

Ineffective approaches to teaching early reading, failing to identify students who are at risk for word-reading difficulties in Kindergarten or Grade 1, and not providing these students with early, evidence-based tier 2 and 3 interventions leads to more students needing costly professional services, particularly psychoeducational assessments. By addressing students' early reading challenges effectively, we can reduce the need for assessments and free up board professionals to support students and educators in other ways.

Board professionals such as psychologists and speech-language pathologists have a wealth of knowledge and an important role to play in implementing this report's recommendations. Currently, however, due to excess demand, their focus is on

assessment and they have less time to support students in other ways. By reducing the number of assessments that are needed due to word-reading difficulties, professional staff will have increased capacity to support evidence-based early screening and interventions; help determine which students need interventions and which interventions would be appropriate; help assess students' response to intervention; help with accommodation planning; and support professional development for educators. Psychology staff also have demands to deal with student mental health challenges such as anxiety and depression, help students experiencing social and emotional difficulties, engage in crisis response and make referrals to community-based services.

### **Many students are waiting too long or not being assessed at all**

In the current system, by the time a student receives a board professional assessment, if they receive one at all, they have been struggling for years. Boards rarely consider referring a student with a suspected reading disability for a psychoeducational assessment before Grade 3, even though the Ontario Psychological Association has said that delaying assessment for a learning disability is not necessary or appropriate and can be harmful to students. If the student is referred for an assessment, they may be on a wait list for several years, particularly if they are not deemed to have high needs or be a high priority for assessment. Students who struggle in silence may be overlooked for assessment or may be moved down to the bottom of the list. They may not be assessed until Grade 5, 6 or even later. Many students are never referred, so their families pay for costly private psychoeducational assessments, if they can afford to.

Although boards do not report formal quotas on how many students they can refer for professional assessment, in reality there are limited spots per school. Many students who would meet objective criteria for assessment may not be considered because a school has already assigned all available spots. This is exacerbated by the lack of formal, written, transparent referral criteria in many boards.

### **Boards lack appropriate criteria for referring students with suspected reading disabilities**

Other than the highly problematic requirement that students be in at least Grade 3 before being referred for an assessment, boards had little or no consistent and objective criteria for identifying students with suspected reading disabilities for assessments. Some inquiry boards had relatively clearer, documented procedures and flow charts or checklists, and some specific criteria for decisions about professional assessments. However, other boards had little or no transparent documentation for the process or factors that are considered. Decisions about assessments are often left to school-level teams. This creates the potential for wide differences between schools within a board,

and between different school boards. Students with the same pattern of academic functioning may be candidates for an assessment at one school but not at another. Bias can play a role when referrals are not based on transparent and objective guidelines from the board or the province. Inquiry boards even identified considerations that would appear to have a high risk of bias such as cultural factors, lack of student motivation, language differences, and poor student mental health. Many boards reported waiting years before referring a multilingual student for assessment on the inaccurate assumption they need several years of exposure to the language of instruction before they can be assessed for a learning disability.

### **Decisions to refer students should be based on response to intervention**

Clear and transparent criteria and formal processes for referring students for psychoeducational assessments should be developed. These criteria should not be based on arbitrary or potentially biased factors such as a minimum age/grade cut-offs (for example, age 8/Grade 3), a certain minimum number of years of instruction in the language of the school system (for example, for multilingual students) or assumptions that learning difficulties are due to socioeconomic factors or cultural differences. Instead, the criteria should be based on a student's academic functioning and response to intervention.

As discussed, a tiered approach with evidence-based instruction and interventions for foundational word reading skills would mean many fewer students need referral for reading difficulties. Referring a student for a psychoeducational assessment in these cases can happen as early as late Grade 1 or Grade 2. For students beyond these initial grades who struggle with word reading accuracy or fluency, referrals can be initiated at the same time as tiered interventions.

Schools should also be alert to the signs of a reading disability in multilingual students. They should not delay intervention or assessment unnecessarily. They should not set rigid cut-offs for interventions or assessments, such as requiring a minimum of two to three years of schooling in the language of instruction (English or French).

### **Requirements for identifying a learning disability should be aligned with current knowledge**

The current Ministry of Education definition for identifying a student as having a learning disability says students should have “academic underachievement that is inconsistent with the intellectual abilities of the student” which should “be at least the average range” and/or “academic achievement that can be maintained by the student only with

extremely high levels of effort and/or with additional support.” The latest research or principles for diagnosing word-reading disabilities/dyslexia in the DSM-5 do not require students to have at least average intelligence or a discrepancy between their ability and achievement. These criteria do not predict whether a student will respond to an evidence-based intervention.

The current DSM-5 criteria for diagnosing a learning “disorder” simply requires finding:

- a. The student experiences difficulties in reading, writing or math skills, which have persisted for at least six months even though the student has received interventions that target the difficulties
- b. The difficulties result in the affected academic skill(s) being substantially and quantifiably below those expected for the student’s age. This is determined through standardized achievement tests and clinical assessment
- c. The learning difficulty started during school-age years (or even in preschool), although it may not become fully evident until young adulthood in some people
- d. The problems are not solely due to intellectual disabilities, hearing or vision problems, other mental or neurological “disorders,” adverse conditions or inadequate instruction (however, reading disabilities/dyslexia can co-exist with other disabilities including mental and neurological “disorders”).



Assessments for suspected reading disabilities do not always need a battery of intelligence and cognitive processing tests. Instead, assessments for a learning disability or “disorder” in word reading/dyslexia should include a thorough assessment of reading and spelling skills, document the student’s response to interventions, and identify further interventions or accommodations for the student. If there are other concerns, a psychologist can also investigate and identify possible co-existing difficulties or disabilities such as attention issues, developmental language disabilities, or mental health

issues. However, even if a student with dyslexia has other disabilities, they should not be disqualified from receiving reading interventions.

When a learning disability is diagnosed, there should be a statement of what academic areas are impaired (for example, word-reading accuracy or fluency (dyslexia); reading comprehension; written expression; or math). If several areas are impaired, they should all be identified.

The DSM-5 recognizes dyslexia as an alternative term to refer to “a pattern of learning difficulties characterized by problems with accurate or fluent word recognition, poor decoding, and poor spelling abilities.” The current practice in Ontario is to use only the non-specific term “learning disability” and not to recognize the term “dyslexia.” As a result, a lot of valuable information for students, parents and educators is lost.

Categorizing learning disabilities by the area of academic impairment and recognizing and using the term “dyslexia” will allow better data collection on the prevalence of specific learning disabilities for better allocating resources, tracking the effectiveness of interventions for students with word-reading difficulties, and monitoring achievement for these students. This is currently not possible with the general category of “learning disability.” Collecting information on specific learning disability areas, rather than learning disabilities in general, is more useful and will provide more clear and accurate information for students, parents and educators.

## **Boards should improve their management of professional assessments**

The Auditor General of Ontario has identified concerns with boards’ current approach to managing professional assessments. In 2017, the Auditor General found potential for wait times to vary significantly based on the school the student attends and because the wait-list information is not consolidated, boards cannot properly prioritize students for assessments. The Auditor General recommended steps boards should take to better manage their professional assessments. Yet, with few exceptions, boards have failed to implement these measures.

Most inquiry boards do not maintain centralized, electronic wait lists or have case management systems for tracking or assigning professional assessments. As a result, several boards could not provide any information on students waiting for assessment, including identifying when students were placed on a wait list and how long they were waiting, or providing average and mean wait times for assessment. The inquiry boards lack data that would allow them to assess whether they are providing this service in a timely and equitable way.

Only one school board, which does maintain a centralized electronic waiting list, said it could reallocate students between psychology staff to make sure a student does not wait too long for assessment as recommended by the Auditor General. None of the inquiry boards conduct summer assessments as recommended by the Auditor General.

The Ministry is aware of the issues with boards’ management of professional assessments. Board Special Education Plans are supposed to include information on managing wait times and wait lists for assessments, but even the Ministry has



little information or data on wait times and wait lists in individual boards. It was not clear whether the Ministry has plans to require boards to improve their approaches to managing and collecting data on wait lists and wait times for professional assessments.

## **Professional assessments should not be required to access accommodations and interventions**

Psychoeducational assessments are often used to obtain a formal diagnosis (and used, for example, for the IPRC process). However, under the *Code*, a professional assessment or diagnosis must not be required for a student to receive interventions or accommodations. The Ministry has also recognized that a diagnosis is not a pre-requisite for special education supports, saying that special education programs should not be based on any “specific diagnosed or undiagnosed medical condition, but rather the needs of individual students based on the individual assessment of strengths and needs.”

Most boards reported they do not require a professional assessment or diagnosis to offer a student accommodations or interventions. However, one board does require a diagnosis to access its most intensive intervention and other boards said a student with a learning disability diagnosis is more likely to be included. This is a significant barrier for many students who need the program. A diagnosis should not be needed to access interventions or accommodations.

The inquiry heard from many parents and educators that even when not required, a professional assessment helps secure accommodations or interventions for a student. Given the very limited access to board professional assessments for students with suspected reading disabilities, parents often pay thousands of dollars for a private psychoeducational assessment. This is a significant hardship for some parents, and many others cannot afford to pay for a private assessment at all. This creates a “two-tiered system” in a public education system that should be equitable for all. It can entrench pre-existing disadvantage and intergenerational cycles of low literacy. From a human rights perspective, it is critical that all students who need them have equal access to accommodations and interventions, regardless of their parents’ means to pay for private assessments.

**From a human rights perspective, it is critical that all students who need them have equal access to accommodations and interventions, regardless of their parents’ means to pay for private assessments.**

# Systemic issues

## Key findings and recommendations



There is a significant lack of standardization in approaches to supporting students with reading difficulties across Ontario. Students' experiences vary widely based on where in the province they go to school, and even which school they attend within a board. There is an urgent need for the province and school boards to establish consistency and provide clear guidance on how all boards and schools should approach the issues identified in this inquiry.

There is little data available at the board or provincial levels to support high-quality decision-making, service delivery and programming or to measure and address achievement gaps for groups of students. Good data is not available to support monitoring or accountability. Data is not being used to identify and close equity gaps, an important requirement to prevent systemic discrimination under the *Code*.

The inquiry identified lack of transparency and communication as significant concerns for families. Parents often don't know about their child's reading development and difficulties or what interventions and accommodations are available or being implemented. A lack of effective dispute resolution processes in schools and boards has caused significant stress for students, parents and educators.

## Recommendations

The OHRC recommends the Ministry of Education and boards set standards and ensure consistency, monitoring and accountability in the education system generally, and for students with disabilities and other *Code*-protected identities [**Recommendations 131 to 137**].

## Recommendations

The OHRC recommends the Ministry and boards to continue to improve data collection, analysis and reporting, and better use data to increase equity, improve student achievement and outcomes and for better decision-making [**Recommendation 139 to 150**].

## Recommendations

The OHRC recommends better approaches to transparency and communication when a student is having difficulty with reading, and about screening, intervention, accommodation and professional assessment supports available to them. Parents should be kept aware of student progress and conflict resolution options available to them [**Recommendations 151 to 157**].

## Recommendations

The OHRC recommends the Ministry provide sufficient, stable, enveloped, yearly funding to meet the right to read. This includes funding for boards to hire extra staff such as literacy leads [**Recommendation 45**], provide comprehensive in-service professional development [**Recommendation 57**], conduct universal evidence-based early screening [**Recommendation 59**], provide evidence-based interventions to all students who need them [**Recommendation 68**], improve access to accommodations [**Recommendation 90**] and remove barriers to receiving professional services [**Recommendation 130**].

## Recommendations

The OHRC further recommends the Ministry provide additional funding and support where it is needed to make sure northern, remote, rural and small boards can fully implement the recommendations [**Recommendation 134**]. At the same time, the Ministry of Education should make sure money isn't being spent on supports that are not validated or proven to be effective for students with reading disabilities, and explore bulk purchasing opportunities [**Recommendation 138**]. Resources should not be taken away from supports for other vulnerable students to implement the recommendations in this report.

### Students across Ontario should have equal access to evidence-based approaches

The systemic issues and barriers identified in this inquiry require a systemic response. Ontario students deserve consistent, standardized approaches and universal access to the same level and quality of services and supports regardless of which school or school board they attend, and whether the language of instruction is English or French. They deserve a systematic response that addresses all the key components of meeting the right to read. Instead, students' experiences vary widely by where they live or go to school. They experience a piecemeal and *ad hoc* patchwork of largely ineffective approaches and services that often fail to address their needs.

Educators and other board professionals also deserve consistency and support to implement evidence-based approaches with their students. They want to do the best for their students. They see and must respond to the academic and mental health challenges that many students face when they fail to learn to read. The lack of clear and consistent guidance is an additional burden on educators, as they often are left to figure out the best approaches on their own. They must also deal with the downstream effects of failing to respond well to early reading difficulties such as increased need for accommodations. Educators also told the inquiry that changes in school and board leadership may result in frequent, unsettling shifts in direction depending on these leaders' preferences, which may or may not be based on the research science.

Ontario's highly decentralized approach to education, including special education, leaves decision-making on key components of the right to read to the discretion of 72 different school boards and school authorities with little centralized guidance or few standards. One board told the inquiry this means that "not all boards are rowing the boat in the same direction."

When it comes to meeting the right to read, Ontario needs consistency and stability. This means clear, mandatory standards related to curriculum and instruction, early screening, reading interventions, accommodations and professional assessments. It requires ongoing monitoring and better accountability within the education system. And, importantly, it requires stable, enveloped, yearly funding.

The inquiry collected information from multiple sources and found that there is little standardization, consistency, monitoring or accountability in the five areas that are essential to meeting students' right to read. Processes currently in place do not hold boards to a standard of excellence in reading instruction and related services, do not ensure equitable access to evidence-based interventions and accommodations, and do not allow boards or the Ministry to identify problems or disparities in the system.

Boards are required to follow the Ontario Language curriculum and the Ministry's Policy/Program memoranda (PPMs). Unfortunately, the current curriculum and PPMs related to screening, professional assessments, learning disabilities and other matters relevant to students with reading difficulties are mostly outdated, do not reflect current science or evidence, or limit boards' ability to promote consistency and standardization. Where the Ministry has tried to supplement these with better information about responding to the needs of students with reading difficulties, it is mostly with optional guidance.

The inquiry's findings about failing to set standards and ensure consistency, monitoring and accountability are not new. Many other reports, such as by the Auditor General of Ontario and the *Accessibility for Ontarians with Disabilities Act* K-12 Education Standards Development Committee, have identified similar concerns and made recommendations to address them. Implementing these and the inquiry's recommendations will be important to ensure a systemic response to a systemic problem.

### **Little data is collected or analyzed to track and improve student achievement, outcomes and equity gaps**

The OHRC has identified data collection as an important tool to protect and promote human rights. Data collection is often necessary to make sure all groups benefit equally from services. In education, data collection and analysis allows school boards and the province to monitor and evaluate the effectiveness of special education services and supports, and to take steps to measure student achievement and outcomes, particularly for students who come from *Code*-protected and disadvantaged groups. Currently, the lack of data collection, analysis and reporting is a major accessibility barrier in Ontario's education system.



Many previous reports, studies and plans about the Ontario education system have identified a need for better data collection, management, analysis and mobilization. These documents have recognized that data is important for student equity as well as to support effective evidence-based program delivery. They have also found significant deficiencies in the education system's current approach to data.

The inquiry found that some progress has been made in the number of boards collecting demographic data due to the requirements of the *Anti-Racism Act, 2017*. All boards will be required to collect demographic data by January 1, 2023. However, there is still a long way to go to address deficiencies in data collection, analysis, reporting and use. School boards and the Ministry are not using data for high-quality decision-making, service delivery and programming, or to measure and address achievement gaps for groups of students. Good data is not available to support monitoring or accountability.

### **Boards lack the means to collect data centrally**

The inquiry boards are either not using centralized information management systems, are using different student information management systems, or have varying abilities to generate information from their student information management systems. Boards do not collect important data or it is only kept by individual teachers or at the school level. Boards are often not able to collect, analyze or respond to this data centrally. This also means that the Ministry of Education cannot compile and analyze important data from across the province.



The inquiry asked for data on students' progress in reading, early screening, reading interventions, accommodations and professional assessments. With few exceptions, boards did not have this important data. They had some information on students formally identified with a learning disability exceptionality, but no information about students who have reading disabilities/dyslexia specifically and students who are having difficulty in reading and who may therefore be at risk for a reading disability or dyslexia. They had little centralized data on students' reading progress and student achievement or outcomes. They largely could not measure the effectiveness of their reading instruction, early screening, intervention programs and accommodation approaches or identify equity gaps.

### **Issues with student demographic data**

Although more boards are now conducting a student census to collect demographic data about equity indicators such as race, ethnicity, creed (religion), disability, gender identity, sexual orientation and socio-economic status, they are not always collecting the same data. This makes it difficult to compare data across boards or analyze it at a provincial level.

In terms of disability, boards typically only collect some limited data on students who have gone through an IPRC process and been formally identified as having a learning disability exceptionality. Many students with reading disabilities are never formally identified through this process. Even where they have been identified by an IPRC, it is not known whether their learning disability is in reading, and if the student has been identified with more than one exceptionality, they are categorized under a general "multiple exceptionalities" category. This obscures the nature of the exceptionalities and does not allow meaningful data collection on students with co-existing disabilities. Even census questions about disability do not allow parents or students completing the census to identify a reading disability/dyslexia.

At the time of the inquiry, boards did not appear to be analyzing data to identify intersections between having a learning disability and other *Code* grounds. For example, the inquiry boards had little or no data about gender identity, race, co-existing disabilities, Indigenous ancestry or socioeconomic status of students identified with a learning disability exceptionality. As more boards start to collect student census data (required by January 1, 2023), it will be important that they conduct intersectional analyses and link the demographic data to other available data in their student information systems (for example, student achievement data).

While boards have relatively more data about students who self-identify as First Nation, Métis or Inuit, there are issues there as well. For example, one board told the inquiry that data about students who have self-identified as First Nation, Métis or Inuit and who also have special education needs is school-level data that is “not easily acquired.”

## **Student success indicators and equity gaps**

Most boards lack useful data to analyze indicators of student success and outcomes such as academic pathways (whether students were taking mostly academic or applied courses in Grade 9) and post-secondary attendance. Most boards do not collect this data, or if they do, they do not link it with other data to assess whether there are disparities for certain groups (for example, students with disabilities, First Nations, Métis and Inuit students, racialized students, or students from low-income backgrounds).

Only one inquiry board had started the process of linking its census data with other data to assess disparities in student outcomes (achievement, suspension rates and graduation rates). It has recognized the importance of going further to analyze disproportionate representation of different groups across programs and services, and to consider if there are differences in students’ sense of belonging and safety.

## **Lack of transparency and communication with parents**

Many parents find the education system opaque and difficult to navigate. They don’t know or understand how processes for screening, intervention, accommodation, modification and professional assessments work. They are often not aware what services and supports may be available to their child, or whether and how their child’s needs are being met. In a system that relies heavily on parental advocacy, this places some parents at a significant disadvantage. For example, the inquiry heard that First Nation, Métis and Inuit parents feel intimidated by the school system due to ongoing trauma from the residential school system and other reasons, and are even less likely to raise their concerns with the school.

The OHRC identified situations where schools failed to share important details with parents about their child’s progress in reading, screening, interventions, accommodations, modifications and professional assessments. For example, we heard that schools do not always tell parents when an educator has observed that their child is having difficulties with reading. Parents may be unaware of what accommodations their child is receiving, what interventions are being tried and how their child is progressing. Some parents even reported agreeing to modifications to their child’s curriculum expectations without understanding the implications and consequences. Parents also described not knowing how long their child would have to wait for a reading intervention or professional assessment.



Schools communicate with parents through tools such as report cards, IPRC recommendations and IEPs. But, the inquiry heard that these are generally not detailed, accessible, frequent or dynamic enough to provide information to understand how the student is progressing and what extra supports they may need.

## **Improvements to communication and transparency will benefit students, parents and educators**

Sharing information with parents (and with students, where appropriate) in an accessible, plain-language way that invites their involvement and feedback helps parents and students feel welcome and engaged, which improves outcomes for students.

Many educators also advocated for more effective information-sharing between teachers and other school staff. They felt this would help them build on and support the practices of other educators, and better ensure a seamless experience for students when they transition between classes or schools.

Communication needs to take into account the reasons why some families may be worried about their child being assessed or given accommodation or interventions. Parents may be worried that their child may face stigma if assessed and found to be at risk for reading difficulties or withdrawn from the classroom to receive intervention. This may be a particular concern for certain communities who have been stereotyped or have experienced data being misused to portray them in negative ways. It will be important for boards and schools to provide information so that families can make informed decisions for their children through a variety of means, such as community council or parent council meetings, multilingual school newsletters, education open houses and parent-teacher meetings.

## **There are better ways to resolve disputes when they arise**

From time to time, parents and educators disagree on the needs of the student and how best to meet them. Without good dispute resolution mechanisms, these disagreements can become tense and even escalate to the point of human rights complaints. Many parents reported being uncomfortable raising concerns or fearing reprisal for their students. Once again, some parents are in a better position to raise concerns or to advocate on behalf of their child.

Parents need to know which staff members, and which dispute resolution services, are available to them when they have a conflict. Boards should have and publicize an accountable and non-adversarial timely dispute resolution program.

# Conclusion

The OHRC identified ableism and low expectations for students from certain *Code*-protected groups as a significant theme in its inquiry. Some supporters of approaches currently used for early reading instruction in Ontario argue that the education system should not be changed to accommodate students with reading disabilities or others who fail to learn to read well. They suggest that many students' reading difficulties are inevitable, or that instead of focusing on the instruction and supports students receive as contributing to equity gaps, we should be focusing on other reasons why students are falling behind their peers.

There are indeed several sources of historical and societal disadvantage for many students. Having strong early word-reading skills is not enough on its own to overcome structural disadvantage in education and in life. However, when students start school at a disadvantage and then fail to learn this basic skill, it only deepens their disadvantage.

Our education system has a responsibility and a legal duty under the Ontario *Human Rights Code* to remove any barriers that limit students' opportunities to learn and succeed. The findings and recommendations in this report are a matter of overall equity in education.

There are also many education stakeholders who recognize that the current approach to early reading instruction is a social justice issue because it contributes to education and lifelong inequities. They are important voices for change and will be important partners in addressing this report's findings and recommendations.

Responding to this inquiry's findings and implementing its recommendations will take work. It will require many partners to come together to implement change. It will require a sustained commitment to address the inequities in learning to read that many Ontario students currently face. As this report does not address all aspects of a comprehensive approach to literacy, further research will be needed to make sure Ontario addresses all the critical components of a rich language arts curriculum while improving its approaches to teaching foundational reading skills. This work can and must be done. It is time for change.



# Enhancing Special Education Services in our District

## Monitoring Document 2021-22










**Reallocation of Resources:** Restructuring supports, services, teams and programs to meet the changing needs of students and schools and to equitably distribute resources.

**Professional Learning:** Provide ongoing and relevant professional learning to a variety of staff in order to build capacity to meet the needs of diverse learners in an inclusive learning environment.

**Strengthening Partnerships and Leveraging Supports:** Strengthen and enhance partnerships with families and community partners to leverage supports and maximize student learning and well-being.

**Learning for All:** Support the implementation of differentiated, precise and research-based instructional strategies to support the learning and well-being of all students.

Reallocation of Resources	Beginning	Continuing	Enhancing
Align and coordinate referral processes for District Teams and support multi-disciplinary team collaboration		✓	➡
Critically examine application processes for District programs and explore the alignment with goals/purpose of specialized programs	✓	➡ ✓	
Expand the collection of role-specific data to inform the allocation of resources, supports and services		✓	

Provide timely, responsive and ongoing support to school teams based on urgent student need.			
Professional Learning	Beginning	Continuing	Enhancing
Embed Universal Design for Learning principles in professional learning opportunities			
Provide professional learning opportunities focused on a relationship-based approach to supporting student learning and well-being			
Improve access to and availability of online resources and professional learning			
Strengthening Partnerships and Leveraging Supports	Beginning	Continuing	Enhancing
Develop supportive resources for students and parents (IEP and IPRC)			
Communicate and collaborate with students, families, staff and community partners to gather voice and lived experiences			

Enhance partnerships to provide mental health and well-being resources and supports			✓
Collaborate with community partners to support the successful transition of students to/from school			✓
Learning For All	Beginning	Continuing	Enhancing
Support the development and implementation of precise and personalized plans for students (IEP, SSP, Medical)		✓	
Collaborate with Program Team/Curriculum Department to explore literacy and numeracy supports and interventions		✓	
The continued training and effective use of accommodations to support student learning and success (ie Assistive Technology)			✓