



LDAO Response to the Report of the Drummond Commission On the Reform of Ontario's Public Service

March 2012

As the organization representing the interests of children, youth and adults with learning disabilities throughout Ontario, the Learning Disabilities Association of Ontario (LDAO) would like to take the opportunity to comment on recommendations in the *Report of the Drummond Commission on the Reform of Ontario's Public Services*. We do recognize that the Government of Ontario needs to be fiscally responsible in these challenging economic times, while at the same time ensuring that programs and services required by Ontario's most vulnerable citizens are maintained and enhanced – clearly not an easy task.

People with learning disabilities (LDs), of all ages, represent the largest disability group in Ontario. In the publically funded school system, students with LDs have made up over 40% of students receiving special education. Learning disabilities influence all areas of a person's life and the effects of LDs impact the mandate of many government ministries, including education, transitions to postsecondary education, sustainable employment, poverty and social assistance, the mental health sector, the justice system and corrections. That said, with early identification and diagnosis, the proper accommodations in education and training, and support for individuals and families, people with learning disabilities can become among the most creative, and productive members of society.

Chapter 6: Elementary and Secondary Education

Supports in education are very important for young people with learning disabilities, and some of the recommendations in Chapter 6 will have significant implications for the students we represent.

Limits to Funded Secondary School Credits

Drummond Report Recommendation 6-14, to *cap the funding of high school credits to 32 successful credits per student, and amend the Education Act to give the power to school boards to charge a modest fee, set by the province, for each additional credit above the 32 successfully completed credit threshold.*

This recommendation has the potential to disadvantage students receiving special education programs and/or services. For example, many students with learning disabilities take credit courses in learning strategies and career development in addition to their other curriculum courses, and these important courses add to their credit count. Some students whose academic skills are not adequate entering high school take locally developed credit courses to upgrade their math and language skills before taking applied level credits. Others may take an applied level course and then realize that they can be successful in the academic level course, with

appropriate accommodations. All of these are very legitimate reasons for having higher credit totals.

The recommendation would also disadvantage students who decide midstream that they would like to pursue a new career goal which requires prerequisite courses they have not taken. The education system should be encouraging students to set educational goals, and not handicapping those from lower income families who change their goals.

Finally, although the recommendation does not restrict the number of years that a student can attend secondary school, we point out that it is important to maintain the ability of students to spread out their courses over more than four years. Many students with learning disabilities in high school as well as in postsecondary studies benefit from doing a reduced yearly course load, since they have to put so much effort into each course.

LDAO recommends that the number of high school credits a student can take without user fees not be limited to 32 successfully completed credits, especially for students with special education needs.

Encouraging Efficient Student Transportation:

Recommendation 6-16: *The province should amend the Education Act to give school boards the power to charge a modest transportation user fee set by the province.*

Students who are identified as needing special education supports and services have a legislated right to access those services without paying user fees.

LDAO recommends that any change to allow school boards to charge transportation user fees include the provisions mentioned in the report: “Provisions could be put in place to ensure that lower-income, special needs and rural students do not have their access to learning restricted.”

Elimination non-teaching positions:

Drummond Report Recommendation 6-17 to *eliminate 70 per cent of the 13,800 additional non-teaching positions created in school boards since 2002–03.*

LDAO believes that reducing non-teaching positions would be very shortsighted and that such a reduction in the special education sector could lead to failure to accommodate students under human rights legislation.

Non-teaching staff have a very important role in supporting students with special education needs, including students with learning disabilities. First of all, professionals in such fields as psychology, speech-language pathology and occupational therapy carry out the assessments that are necessary in order to program appropriately for students with learning disabilities and some other exceptionalities. Even with current staffing levels the wait times for professional assessments are unacceptable.

Many students with special education needs also struggle with emotional/social issues, and social work staff can play a vital role in supporting them and their families. Behavioural issues in

students are often related to underlying neurobiological factors, and teachers need the support of appropriately educated staff, including child and youth workers, in order to deal effectively with classroom behaviours.

LDAO believes that students with learning disabilities should be taught by educators with special education qualifications, but educational assistants can play an important supporting role. Other exceptionalities rely even more heavily on educational assistants for special education supports.

Many school boards employ teaching staff in a consultative capacity as learning disabilities program leads to support teachers in developing effective teaching strategies from assessment information, collaboratively develop IEPs, and network with other educators and parents. One important function for this role is to share the effective use of appropriate, current, evidence-based assistive technology as a teaching, learning accommodation for students with LDs.

LDAO recommends that current levels of funding be maintained for non-teaching staff who support students with special education needs.

Promoting Evidence-Based Solutions in Special Education

Drummond Report Recommendation 6-18: *The province should review its special education programs and the results they have achieved, including both “section” programs for students in care, custody or treatment, and hospital boards, with the aim of ensuring that funding is being used effectively to improve student outcomes.*

LDAO supports the need for evidence-based approaches to special education and shares some of the concerns outlined in this section of the report. For example, we too are concerned about the number of students receiving special education services without formal identification as exceptional, and agree that “If all boards used provincial criteria for their IPRCs and if all data were reported independently, special education funding could be allocated more consistently and more equitably while maintaining local flexibility and decision-making.”

We concur that EQAO results are not a sufficient way to track improvements in student achievement, and that we lack a “system-wide procedure to track progress and achievement in students in areas such as communication skills, social skills or behaviour management, all of which affect student achievement.” Student improvements are not always reflected in academic scores. Some way of measuring progress toward IEP goals could be a useful approach.

LDAO supported the recommendation in the 2008 Provincial Auditor’s Report that “the Ministry of Education identify the information that is required to support evidence-based program delivery models (for example, information about the circumstances and educational programs—type, timing, and amount of services and supports—of students with special education needs), as well as the results the students achieve.”

In our response to that report we recommended “that the Ministry of Education set up a specific reference committee or working group to compile information on instructional techniques for students with LDs that are based on credible current research” and LDAO is pleased now to be participating in a new Learning Disabilities Working Group. Information on evidence-based,

research-informed instructional techniques for improving academic skills for students with learning disabilities does exist, and it needs to be shared with educators.

Students with learning disabilities are over-represented in Section 23 programs for students in custody, care or treatment, and it is important to maintain these programs. The success of these programs is hindered by difficulties in the smooth transition of students into and out of these programs from/to community schools, and in the continuity of implementing effective IEPs.

LDAO recommends that the Ministry of Education support evidence-based program delivery models for students with special education needs, and develop a system-wide procedure to track student progress and achievement in academic skills and in areas such as communication skills, social skills or behaviour management.

LDAO recommends that any review of effectiveness of Section 23 programs includes the need for improvements to transition processes into and out of these programs, and for better continuity of implementation of IEPs.

Reform of Provincial Schools

Drummond Report Recommendation 6-19: *The government should close the Demonstration Schools and reinvest savings to expand alternative secondary school programs in school boards.*

Learning disabilities vary in their complexity, severity and their effect on acquisition of academic skills. Research on education for students with learning disabilities demonstrates the importance of intensity, specificity and individualization in teaching approaches that are effective. In the conclusions from their comprehensive review of research on learning disabilities, *Learning Disabilities: from Identification to Intervention*, The Guilford Press, 2007, Jack Fletcher and colleagues summarized the findings on evidence-based approaches, stating that students with LDs need to have “intensive specialized remediation” whereas “remedial instruction is frequently carried out in larger groups that make it difficult to ensure the level of intensity needed to accelerate growth in academic skills.” (p. 264).

The Demonstration Schools have filled the role of providing a period of intensive special education programming for students who have severe and/or complex LDs, in order to prepare them to return to programs operated by a local school board. This option was set up in part to replace a previous practice of paying for students with severe LDs to attend specialized private schools (a practice still followed in some other provinces). No other publically funded setting in Ontario provides the intensive level of support offered by the Demonstration Schools. The schools were set up as residential programs because the students require a highly structured program for organizational skills, homework structure, social skills programming and advocacy skill building.

In addition to this role, the Demonstration Schools provide resource support to school boards for students who attend their schools for one or two years, but also for other students with severe and/or complex LDs in the school board. Demonstration Schools are a testing ground for new teaching models and approaches as well as current assistive technology accommodations, with a student population that can be easily studied. Teachers are trained and learn how to better

provide service and support learning for students with LDs through the many workshops and learning opportunities offered at the school.

If the government were to consider closing the Demonstration Schools there would need to be a credible, accountable alternative for those students with LDs who require the intensive educational programming and training in assistive technologies that the Demonstration Schools provide. The idea of school boards extending alternative secondary school programs could potentially benefit more students, but only if appropriate research-based intensive programming was provided to the students with LDs who needed it. Any monies funneled into school boards for this purpose would need to have very strict accountability to make sure that it was actually spent on this kind of program.

There has been a great deal of expertise developed in the network of Provincial Demonstration Schools, and the Ministry would need to maintain a way of sharing this expertise with parents, educators and school boards. This resource services function of the Demonstration Schools would need to be preserved and extended if the responsibility of teaching students with severe learning disabilities were to be delegated to school boards.

LDAO recommends that the Ministry of Education consider the many vital functions that the Demonstration Schools fulfil, and continue to support those functions. If any change to the present system is to be considered, the Ministry should create an accountable method of assuring that students with severe or complex LDs would continue to receive the services they require across the province, and should maintain and extend the expert resource services currently available to parents, educators and school boards through the Demonstration Schools.

Delivering Services More Efficiently

LDAO has for many years supported the cross-ministerial integration of services to children and youth. Some progress is being made on this front, but there is much more that can be done.

LDAO supports the recommendation quoted from the Pascal report of “*making schools ‘true community hubs’ for service delivery.*”

Chapter 7: Post-Secondary Education

Many students with learning disabilities go on to postsecondary studies in college, university or apprenticeship.

LDAO supports the Commission’s direction to the Ministry of Training, Colleges & Universities to, “*refocus resources and rewards towards teaching in post-secondary institutions*” and “*refocus provincial funding to reward teaching excellence*”.

As we stated in our response to the 2004 Postsecondary Review by Bob Rae, “the fundamental requirement for enhancing student success is to improve significantly the quality of teaching.” “Attitudes to teaching need to change and excellence in teaching needs to be valued a great deal more.” Our response went on to say that “all institutions should be formally expected to implement the principles of universal instructional design for the benefit of all learners.” While

use of universal instructional design does not eliminate the need for accommodations for students with disabilities, research has shown that they benefit students who are disadvantaged for a variety of reasons.

LDAO recommends that post-secondary institutions promote teaching excellence and the use of universal instructional design principles, while maintaining accommodations for students with disabilities.

Drummond Report Recommendation 7-22: *Streamline student financial assistance by decoupling loans and grants. Eligibility for grants should not be contingent on loan applications.*

For many years LDAO and others in the postsecondary disability sector have been advocating to have the BSWD decoupled from financial eligibility for OSAP. The BSWD is intended to help students with a permanent disability meet specific disability-related costs, such as psychological assessment, assistive technology and tutoring. However a significant portion of students with learning disabilities are unable to access the BSWD due to OSAP ineligibility, for various reasons including taking a reduced course load (less than 40%).

LDAO recommends that eligibility for the Bursary for Students with Disabilities (BSWD) not be contingent on application or eligibility for an OSAP loan.

Drummond Report Recommendation 7-29: *Compel post-secondary institutions to examine whether they can compress some four-year degrees into three years by continuing throughout the summer.*

LDAO has some concerns about this recommendation. The commission does mention the fact that many students need to work in the summers to pay for their education, and therefore the four-year degree should not be abandoned. It is also relevant that many students with learning disabilities take a reduced courseload, due to the time and effort it takes to compensate for their LDs. If it became the norm to compress degrees into a three year time period, such students could be disadvantaged.

LDAO recommends that an option for a four-year degree continue to be available, and that students with disabilities who wish to take the year round option be able to take a reduced courseload under this system.

Chapter 8: Social Programs

Transforming Ontario's Benefit Programs

Although the majority of youth and adults with learning disabilities (LDs) do not need ongoing income support, there are many individuals with identified or unidentified LDs who struggle with employment issues and end up participating in Ontario Works or Ontario Disability Support Programs.

Initial Assessment

Drummond Report Recommendation 8-6: *Undertake a thorough initial assessment of new entrants into social assistance to identify the degree of intervention required to help them return to the labour market. Triage new entrants to appropriate supports according to this assessment.*

Individuals with LDs have complex needs that may not be recognized by intake workers doing initial assessments. Because of their life experiences they may also have coexisting mental health issues that further complicate their situation. Since learning disabilities are the most common disability, it is vital that persons doing intake for social assistance have a good understanding of the complexity of issues involved in LDs. In many cases a self-serve model will not be appropriate.

LDAO recommends that front line workers doing initial assessment of new entrants into social assistance be trained to recognize the complexity of issues involved in learning disabilities, and to carefully consider whether or not to refer individuals with LDs to self-serve models.

Employment and Training

Drummond Report Recommendation 8-8: *Prepare and support people with disabilities who are entering the workplace. Work with employers and fellow employees to properly understand and accommodate the specific needs of the individual in the workplace.*

Effective employment preparation for individuals with learning disabilities has several key ingredients. First of all, it is vital for those with LDs to have a psychoeducational/ psychovocational assessment report which clearly explains areas of strength and weakness, outlines required accommodations, and relates this information to employment goals. Employment planning is a very important part of job preparation for those with LDs, since there is no point in heading toward a goal that is not a good match with an individual's strengths and weaknesses, in addition to their interests and ambitions. Funding models for employment preparation need to take these ingredients into account.

Disability organizations are best suited to “*work with employers and fellow employees to properly understand and accommodate the specific needs of the individual in the workplace*” but as non-profits they require funding in order to do so.

LDAO recommends that support for individuals with learning disabilities to enter the workforce include access to psychoeducational/ psychovocational assessment, and employment planning that is appropriate to their assessed strengths and needs.

LDAO recommends that non-profit disability organizations be funded to help employers and employees to properly understand and accommodate the specific needs of individuals with learning disabilities in the workplace.

Children's Mental Health Services

Drummond Report Recommendation 8-14: *Integrate children's services to enhance early identification and intervention.*

While service integration is a laudable goal, it will be important not to sacrifice the expertise that specific children’s mental health agencies have developed over many years. For example, Integra Children’s Mental Health Centre has a great deal of expertise on children and youth with learning disabilities, and other centres have developed expertise in working with street youth or immigrant populations.

LDAO recommends that service integration of children’s services maintain the specific areas of expertise developed by children’s mental health agencies, while building the capacity of all children’s mental health agencies to serve the needs of children and youth who have LDs.

Contributions of the Non-Profit Sector

LDAO and its network of local chapters depend heavily on volunteers and on fundraising for support. In many circumstances this funding is project-based and therefore not sustaining. We agree with the idea that “*multi-year agreements can help create predictable budget cycles for non-profit organizations.*”

Recommendation 8-17: *Reform funding practices in the non-profit sector to increase flexibility and reduce administrative costs by focusing on measuring outcomes rather than inputs.*

LDAO supports the reform of funding practices to the non-profit sector to increase flexibility and reduce administrative costs, and decrease reliance on unpredictable project-based funding.

Chapter 9: Employment and Training Services

Continue to Seek EO System Improvements

Drummond Report Recommendation 9-1: *Focus the efforts of Employment Ontario on clients who need complex interventions. Streamline clients requiring modest intervention to low-cost, self-serve resources as efficiently as possible.*

As outlined under Chapter 8, many individuals with learning disabilities have complex needs that may not be recognized by intake workers doing initial assessments, and therefore require complex interventions, especially when there are co-existing mental health issues. In many cases a self-serve model will not be appropriate. Employment Ontario workers will need to have training in how to recognize and accommodate LDs.

LDAO recommends that Employment Ontario staff be trained to recognize the complex needs of some individuals with learning disabilities, and to provide interventions appropriate to the assessed strengths and needs of the individual, taking into account any co-existing mental health issues.

Summary of LDAO Recommendations

ELEMENTARY AND SECONDARY EDUCATION

LDAO recommends that the number of high school credits a student can take without user fees not be limited to 32 successfully completed credits, especially for students with special education needs.

LDAO recommends that any change to allow school boards to charge transportation user fees include the provisions mentioned in the report: “Provisions could be put in place to ensure that lower-income, special needs and rural students do not have their access to learning restricted.”

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POST-SECONDARY EDUCATION

LDAO supports the Commission’s direction to the Ministry of Training, Colleges & Universities to “*refocus resources and rewards towards teaching in post-secondary institutions*” and “*refocus provincial funding to reward teaching excellence*”.

LDAO recommends that post-secondary institutions promote teaching excellence and the use of universal instructional design principles, while maintaining accommodations for students with disabilities.

LDAO recommends that eligibility for the Bursary for Students with Disabilities (BSWD) not be contingent on application or eligibility for an OSAP loan.

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SOCIAL PROGRAMS

LDAO recommends that front line workers doing initial assessment of new entrants into social assistance be trained to recognize the complexity of issues involved in learning disabilities, and to carefully consider whether or not to refer individuals with LDs to self-serve models.

LDAO recommends that support for individuals with learning disabilities to enter the workforce include access to psychoeducational/ psychovocational assessment, and employment planning that is appropriate to their assessed strengths and needs.

LDAO recommends that non-profit disability organizations be funded to help employers and employees to properly understand and accommodate the specific needs of individuals with learning disabilities in the workplace.

LDAO recommends that service integration of children's services maintain the specific areas of expertise developed by children's mental health agencies, while building the capacity of all children's mental health agencies to serve the needs of children and youth who have LDs.

LDAO supports the reform of funding practices to the non-profit sector to increase flexibility and reduce administrative costs, and decrease reliance on unpredictable project-based funding.

EMPLOYMENT AND TRAINING SERVICES

LDAO recommends that Employment Ontario staff be trained to recognize the complex needs of some individuals with learning disabilities, and to provide interventions appropriate to the assessed strengths and needs of the individual, taking into account any co-existing mental health issues.