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June 17, 2011

Kevin Costante, Deputy Minister Ministry of Education Mowat Block, 22nd Floor 900 Bay St Toronto ON M7A1L2

Dear Deputy Minister,

The Learning Disabilities Association of Ontario (LDAO) and its 20 community based chapters represent the interests of persons with learning disabilities (LDs) throughout Ontario. LDAO has regularly provided consultation and constructive recommendations on all government initiatives that affect persons with learning disabilities in Ontario. People with LDs, of all ages, represent the largest disability group in Ontario. In the publically funded school system, students with LDs have made up approximately 44% of students receiving special education.

LDAO would like to take this opportunity to comment on the recent review of School Health Support Services carried out by Deloitte and Touche on behalf of the Ministries of Education, Children & Youth Services and Health & Long-Term Care. While our main concerns focus on education, we are also copying this letter to the other ministries involved in the review.

All children in the province of Ontario have the right to attend school and receive an education that meets their needs. Evidence-based research has shown that the strengths and needs that students bring to the learning situation are complex. Although the total number of students in Ontario has been declining, the number requiring special education supports has been increasing relative to the total population. Data also shows that the complexity of the needs of individual students is increasing.

Due to these challenges it has become imperative that:

- teachers have the skills to plan and implement instructional programs that appropriately respond to these complex strengths and needs: and
- supports be put in place that allow all students to learn, engage in the learning environment and access the provincial curriculum.

In 1984 Policy/Program Memorandum No. 81 (PPM 81) was enacted giving direction to school boards regarding the provision of support services that are required beyond the regular instructional program and preventative health programs normally provided to all students. PPM 81 also gives direction to the partnership of school boards and agencies to jointly take responsibility in the delivery of these support services.

Many of the services noted in PPM 81 have been the responsibility of agencies funded through ministries other that education. The partnership across ministries has become

the critical challenge in ensuring that all students get the supports that they require in a timely fashion.

Services noted in PPM 81:

- Oral medication, Injection of medication
- Catheterization, Manual expression of bladder/stoma
- Postural drainage/suctioning, Tube feeding
- Lifting and positioning, Assistance in mobility
- Feeding, Toileting
- Therapies that include:
  - 1. Intensive clinical (treatment)
  - 2. General maintenance exercises
- Speech
  - 1. Speech pathology (treatment)
  - 2. Speech correction and remediation
- All services provided in Children's Residential Care/Treatment Facilities.

Since 1984 there have been numerous task forces, reference groups, reviews implemented to address the concerns of parents, school boards and agencies as there has never been agreement that PPM 81 was complete and ensured that there was consistence and successful practice occurring across the province. The organization and responsibilities of ministries has changed many times since 1984.

As the government of Ontario reopens the discussion regarding the provision of health support services in schools, the Learning Disabilities Association of Ontario (LDAO) urges the government to ensure that the discussion is not narrowly restricted to the support services noted in PPM 81, but addresses the complex needs that students bring to the learning situation and the health supports that they require, e.g. receptive and expressive language therapy by speech-language pathologists and fine motor skills training by occupational therapists.

There has been positive movement that demonstrates a willingness of school boards, ministries and agencies to collaborate to discuss how better to provide services. This is particularly necessary as budgets and funding are under critical evaluation to ensure maximum return for dollars spent.

The provision of health support services for students with learning disabilities, the largest group of students with special education needs, must be part of any meaningful review and discussion regarding the future direction of health support services in the schools.

Sincerely.

Lawrence Barns President & CEO

c.c. George Zegarac, Deputy Minister, Ministry of Children & Youth Services Saäd Rafi, Deputy Minister, Ministry of Health & Long Term Care