

January 19, 2022

VIA EMAIL: stephen.lecce@pc.ola.org

The Honorable Stephen Lecce
Minister of Education
5th Floor, 438 University Avenue
Toronto, ON M5G 2K8

Dear Minister of Education

We are reaching out in regards to the Ministry of Education Update sent to school boards late on Wednesday, January 12, 2022, which provided guidance to school boards on issues they had to address before the resumption of in-person learning on Monday, January 17, 2022.

The Update addressed the issue of reporting and monitoring of school impacts. We have several questions and concerns regarding this topic and we would appreciate a fulsome reply as we believe our members, their students, and Ontario's parents deserve clarity and transparency on the important issue of the safety of their schools.

The Update directs school boards to report to their local Public Health Unit as follows: "If absenteeism rises to a defined level (approximately 30% above their baseline) in schools, principals are required to notify their local PHU." Verbally, however, Ministry officials have indicated that this reference to 30% should be interpreted as the total number of absences and not, as stated in the Update, a level to be calculated in reference to a baseline level of absences. In fact, the possibility that the reporting obligation exists only when 30% of a school's population is absent has been widely reported by the media, without, to our knowledge, correction from your Ministry.

We are very concerned about this possible misinterpretation of your Ministry's guidelines because, as those with an expertise in infectious disease detection and outbreak prevention will tell you, a 30% rate of absence threshold is far too high to allow for the detection of outbreaks in time to take effective action. Conversely, a reporting requirement that is engaged when the rate of absences is 30% higher than a school's usual rate of absences (e.g. an absence rate of 13% where a school's usual absence rate is 10% of its population) more usefully alerts public health authorities to the possibility of an outbreak.

We believe that staff, students, parents, and our communities will be far better served by a lower threshold that will empower them and local public health staff to make decisions to protect their health and safety in a timely manner. Requiring reporting only when absences reach 30% of a school's population will mean that outbreaks will go undetected, and parents will unknowingly send their children to schools where there is an active COVID-19 outbreak.

Consequently, we seek clarification from you regarding the 30% figure. Specifically:

- What, precisely, is the “defined level” at which the reporting obligation is engaged?
- What is the ‘baseline’ referred to in the January 12 Update?

Relatedly, how absences are defined greatly impacts the utility of the reporting threshold. If the intent of reporting is to notify public health authorities and school communities of a potential outbreak in a school, all staff or students who are unable to attend in-person learning due to failing the screening protocol or other reasons suggestive of possible infection should be included in the calculation of absences. However, the Ministry Update does not explain how absences are to be defined.

We are concerned that failing to provide clear direction on this point may lead some school boards to not count as absent those students who login to online learning despite being symptomatic or having otherwise failed the screening protocol. This, of course, serves only to hide the true extent of infection in a school community and withholds from parents and public health officials the data they need to make informed decisions and take action when required.

Consequently, we seek clarification from you regarding the definition of an absence. Specifically:

- Will school boards be directed to include all student and staff absences from in-person learning in their total absence count?
- If not, what direction is being provided to school boards on how to calculate absences?

Third, we seek clarification on what, if any, direction has been provided to school boards or local public health units regarding what occurs when the reporting obligation is triggered. Clearly communicating the actions to be taken will provide school administrators, staff, and students and their families with much needed confidence that the Ministry is aware of and responsive to their worries about the safety of their schools.

Consequently, we seek clarification on what happens when a school experiences a high rate of absences. Specifically:

- Will a school be closed automatically if it reaches the reporting threshold?
- If not, will schools or local PHUs be provided with any direction on this issue or will they be required to make their own decisions in this regard?

Finally, we must express our considerable disappointment with the Update’s and your Ministry’s ongoing and inappropriate use of the term ‘absenteeism’, which refers to the practice of regularly staying away from school or work without good reason. Using the term to refer to students or staff who are unable to attend school because of illness or because they are following the direction of health authorities to self-isolate during a global pandemic unnecessarily maligns Ontario’s students and the hard-working education staff who have been striving to provide them first rate instruction under extremely trying circumstances for almost two years. We are hopeful that future statements will avoid the use of this disparaging and inaccurate term.

The Hon. Stephen Lecce
January 19, 2022
Page 3

It is important that we all do our part to ensure the health and safety of our schools and school communities. We appreciate your attention to this letter and look forward to your prompt response to these questions so that all stakeholders properly understand the policies your Ministry has put in place to protect our members, their students, and our school communities.

Yours truly



Karen Littlewood
President, OSSTF/FEESO

cc. Cathy Abraham, President, Ontario Public School Boards' Association
François Laperle, Director of Labour Relations and Organizational Development, Council of Trustees Association
Hon. Christine Elliott, Minister of Health

GF/tml cope 343