



NLTA Response to Education and Our Future: A Road Map to Innovation and Excellence



A Response by the
Newfoundland and Labrador
Teachers' Association
to the Report of the
Teacher Allocation Commission

April 2008



Table of Contents

- Introduction 2
- Foreword 3
- Reaction to Commission Recommendations and Government Actions 4
 - Class Size Reductions (CSR) 5
 - Smaller Schools 8
 - Student Resource Teachers 9
 - “Expert” Teachers 10
 - Grade 7 - Level III Specialists 11
 - School-wide Specialists 12
 - Early/Late Immersion 13
 - Minority French-Language Education 13
 - English as a Second Language (ESL) 13
 - Speech-Language Pathologists (S-LP) 14
- Administration 15
 - Principals 15
 - School Level Support: Program Specialists 16
 - School District-Level Support: Education Officers. 17
- Recruitment and Retention 17
- Appendix III – Other Issues 18
- Conclusion 20

Introduction

While the Newfoundland and Labrador Teachers' Association is first and foremost an advocate for teachers and teacher rights, it is also an organization which takes very seriously its role as a promoter of and advocate for quality public education. It must be recognized that when conditions are good for teachers, they are also good for students and for education in general.

Changes in the province – declining birth rates, out-migration and increased shifts from rural to urban areas – have implications for the way programs and services are delivered, not only in education, but in all areas. To this point Government's response to changes in the educational context, particularly as it applied to the allocation of teachers, was often reactionary and came only when it was clear that the system was unable to operate without exceptions to rules that clearly no longer fit. Such was the case for the rules governing teacher allocation. In the interim, while cases were being made and documentation collected, students were left without services.

Over the past number of years, in its yearly submissions to Government in pre-budget consultations and supported by a formal study of the increasingly untenable workload of teachers and its ill effects on the education system, the NLTA repeatedly called for a change in the way teachers were allocated. We were pleased, therefore, when the Teacher Allocation Commission was announced in the Speech from the Throne in 2006. The members of the Commission, appointed in August 2006, concluded their work with the submission of a report to the Minister in May 2007. Between August 2006 and May 2007, the NLTA, as a respected player in the educational and social arena in this province, once again represented the voice of teachers in a very significant consultation process carried out by the Commissioners. The Association established an ad hoc committee of NLTA members and staff which, following its own investigations and provincial consultation, prepared a formal submission to the Commission. In addition to that, the Association supported groups of teachers in schools, special interest councils, and others in formulating and having their concerns heard.

While the Commission reported to Government in May 2007, it was not until March 2008 that their report and Government's response to it was made public. At that time the Association undertook an analysis of the Commission's recommendations and the Government response, comparing them to our own submission. This report is the result of that analysis.

The Association applauds the work of Commissioner Brian Shortall and Vice-Commissioner Noreen Greene-Fraize. We also thank Minister Burke, the Department of Education and the Provincial Government for committing to improvements in the teacher allocation process.

While we cannot unequivocally endorse all the Commission's recommendations, our input is reflected in much of their report and we can say with confidence that we know that our voice was heard. We are also encouraged by the fact that many of the Commission's recommendations are supported by Government. Clearly, if Government acts on these recommendations there will be improvements to the system. However, there are areas where we feel there will continue to be issues. We would have been more pleased had Government seen fit to accept some of the recommendations which were rejected, or, in some cases, to apply the ratios recommended rather than accept the principle while adjusting the ratios.

We will continue to work on behalf of the students and teachers in this province to achieve what the Commission refers to as our common "solidarity of purpose", the best possible education for our young citizens.

Foreword

During the development of our written submission to the Commission, the NLTA appointed a special ad hoc committee which was tasked with the job of reviewing and analyzing a number of relevant pedagogical and statistical documents; seeking input from as many teachers as possible during a relatively short period of time; and encouraging teachers throughout the province to submit their suggestions/recommendations/issues directly to the Commission. During its work, it became abundantly clear to members of the ad hoc committee that the old model for the allocation of teaching resources throughout the province was not working and a new approach was needed.

This reaction to the Department of Education document is based on our original submission to the Commission: *Teaching and Learning: The Essence of Education*, in which we made 37 recommendations.

Of these 37 recommendations, twenty were also part of the Commission's report (nos. 1, 2, 3, 5, 6, 7, 8, 11, 12, 13, 14, 15, 18, 19, 22, 23, 24, 31, 34 and 36).

There were four recommendations in the Commission report (nos. 22, 23, 27, 30) which addressed topics which were not a part of our submission. These dealt with the hiring of a manager at the Department of Education for French first language, revisions to the allocation of ESL units, a professional development protocol for administrators, and the hiring of instructional education officers. While these were not part of the Association's original submission, we support their intent.

The Commission made no reference to our recommendation (no. 10) regarding the minimum portion of a teaching unit, at 50%. In both the Commission's report and the Government's response, reference was made only to a minimum class size K - Grade 9.

Fifteen of NLTA's recommendations were not dealt with in the Commission's Report. They were nos. 4, 9, 16, 20, 21, 25, 26, 27, 28, 29, 30, 32, 33, 35 and 37. Number 17 was referenced, but with no specific recommendation.

The issues which were included in these 15 items were: additional time for Department Heads, preparation time, the promotion of French culture, the expansion of skilled trades and technology programs, substitute time for ISSP meetings, maximum class size for e-learning, bursaries to students leaving communities for high school study, home to school transition programming, graduation requirements, increased allowance for guidance counsellors and administrators, caseload for educational psychologists, allocation for hearing and visually impaired and increases in the substitute teacher allocation to address discretionary leaves.

Some of these appear in the Commission's Report as "other issues" recommended for further consideration by Government, a recommendation which the Department of Education has accepted. We will also continue to pursue improvements in these areas through our ongoing liaison with the Department and through contract negotiations.

The rest of this paper will provide detailed reaction to the Commission's Report, *Education and Our Future: A Road Map to Innovation and Excellence*, with particular emphases on Chapter 5: "A New Teacher Allocation Model" and Chapter 6: "Findings and Recommendations". It will examine each of the 35 recommendations and Government's response, using as a lens our own position in NLTA's submission to the Commission.

Reaction to Commission Recommendations and Government Actions

In its submission to the Commission in November 2006, the NLTA advocated for a new approach to the allocation of teaching resources throughout the province. Our proposal was based on the principle that “teacher allocations should be needs-driven/school-developed and community sensitive.” It is reassuring to note that this is the driving principle on which the Commission’s new model is based. This has also been accepted by the Department of Education.

The NLTA submission had recommended the following principle and process for a new allocation model.

PRINCIPLE

- **Needs-Driven/School-Developed:**

That every school complete an Annual School Profile outlining the needs of the total student population and identifying the resources, both human and physical, that would be required to deliver the courses and programs to all students enrolled at the school.

- **Community Sensitive:**

That Community Profiles, developed in conjunction with Regional Economic Development Boards, be used to consider, not only the immediate needs of the school and students, but also the needs of the community served by the school in the formulation of a teacher allocation process.

PROCESS

That an independent Provincial Staffing Committee be established to review each School Profile and determine the teacher allocation. The Provincial Staffing Committee would have equal representation from the Department of Education, the Newfoundland and Labrador School Boards Association (NLSBA) and the Newfoundland and Labrador Teachers’ Association (NLTA).

As outlined in Chapter 5 of the Commission’s Report, the Commission, through its elaborate consultative work and research, arrived at similar conclusions as the NLTA’s ad hoc committee and agreed that a new approach was necessary. Although the Commission did not recommend the establishment of a Provincial Staffing Committee to oversee the process as proposed by the Association, the new approach and process outlined by the Commission and accepted by the Department of Education as its new model provides for a “collaborative, collegial approach” to the staffing of all schools throughout the province. Therefore, the NLTA can support in principle the Commission’s Recommendations 1, 2, 3, and 4.

RECOMMENDATION 1

That the Provincial Government seek to assist school districts with the development and ongoing support of a comprehensive district-wide instructional focus. Furthermore, this focus will be built within each school.

(Accepted by Government)

RECOMMENDATION 2

That the revised Teacher Allocation Model be adopted and a two-fold approach to the allocation phase be implemented. These elements are: (i) a Provincial Teacher Allocation Review Process; and (ii) School District Reports.

(Accepted by Government)

RECOMMENDATION 3

That the Provincial Government make three-year planning commitments to each district, subject to provincial budget decisions and financial policy.

(Accepted by Government)

RECOMMENDATION 4

That the Department of Education develop five-year school performance and demographic data planning modules to assist in the three-year planning commitments made to each school district.

(Accepted by Government)

The Commission has clearly identified (pp. 74-75) three stages in staffing a school and within these stages, two elements. Stage I – the **allocation** of units from Department to School Districts; Stage II – the **deployment** of units from School District to individual schools; and Stage III – the **assignment** of teachers by school administrators to address the programming and student needs in the school.

As Recommendation 2 suggests, the new model for allocating units will have two elements. Element I, “Provincial Teacher Allocation Review Process”, will involve the Department of Education allocating units to each School District based on maximum class sizes for K-9 and a series of different formulae/ratios as they apply to each individual school in the District. These would be specific for such allocations as: classroom teachers (K-9), administrative units, guidance counsellors, specialist teachers, learning resource teachers, etc. Once each School District has received its base allocations and, in turn, deploys all allocated units to each individual school, the school administration and staff will have the responsibility to assess whether or not the allocated units are sufficient to meet the programming needs of the school and the services required by individual students. If certain needs at the school level cannot be addressed sufficiently, the school administration and staff, in consultation with District personnel, must then develop a proposal identifying additional staffing needs, accompanied with the rationale as to why these additional resources are necessary. This analysis, identification, and reporting is the beginning of Element II of the process, the “needs-driven” portion of the new allocation model wherein individual school reports are compiled at the school level. If these reports are linked to the School Development Plan, time must be provided to initiate the School Development Plan since it will play such a significant role in having the school staffed. The school report will assist the Director of Education in compiling a “School District Report”. Each District Director will then meet with Department officials and present its report and rationale as to why additional units are necessary to address the identified needs in individual schools. While there is no guarantee that any and all such requests will be honoured, we have been assured that a significant number of units will be available for this purpose.

Class Size Reductions (CSR)

RECOMMENDATION 5

That teachers be allocated to school boards on the basis of the following class size maximums:

Kindergarten	18
Grades 1-3	20
Grades 4-6	23
Grades 7-Level III	25

(Accepted by Government with revised maximums as follows)

Grade Level	Maximum Class Size
K	20
1-3	25
4-6	25
7-9	27

RECOMMENDATION 6

That in order to enable a practical response to emergent local circumstances, such as an unanticipated influx of students, the assignment of students to classes may be increased by not more than two students subject to the approval of the Director of Education.

(Not accepted by Government)

RECOMMENDATION 7

That where it is necessary to combine two or more grades or courses in one class with one teacher, the maximum class size will be:

Kindergarten – Grade 3	12 students or less
Grade 4 – Level III	15 students or less

(Accepted by Government with revised maximums as follows)

	Maximum Class Size	
	Old	New
K with any one other	15	15
K with any two others	12	12
K with any 3 others (e.g. K-3)	10	10
Any two primary	17	15
Three or more primary	14	14
Any two primary/elementary (e.g. 3-4)	18	15
Three or more primary/elementary	15	15
Any two elementary/intermediate	18	15
Three or more elementary/intermediate	15	15

For many years the NLTA has been a strong proponent of smaller class sizes. During many of its surveys, individual submissions during collective bargaining preparation, meetings with individual and groups of teachers, discussions at Branch and Joint Council meetings, etc., class size concerns have been viewed as one of the significant contributors to an increase in teacher workload. The NLTA has had a policy on class size for many years and has made several attempts on behalf of teachers to incorporate class size limit language into the collective agreements. Unfortunately, to date the NLTA has not been successful in the pursuit of this goal.

Given that there are currently no maximum class size limits agreed to in collective agreement language, nor found in the Department of Education's Staffing Regulations, the NLTA is encouraged by the Department's acceptance of the fact that class size does affect student achievement and thus have agreed in principle with the notion to allocate teaching units based on class size maximums from Kindergarten to Grade 9. However, the NLTA must express its concerns with respect to the maximum class size numbers chosen by the Department, as well as the grade levels to which the maximums would apply, as outlined in the table on page 6. Given that Government initiated a study of the teacher allocation formula, and that the Commission conducted extensive research and province-wide consultation, Government must recognize the maximum allocations for class size as found to be optimal by the Commission. We feel strongly that in particular the ratio for primary grades, 1-3, at 25 is not acceptable. Furthermore, the phase-in period of three years creates serious inequities in the school that can be avoided if the class size maximums were all implemented effective September 2008.

The NLTA will continue to advocate for this and to strongly lobby the Department to improve the class size maximum limits, as well as to expand the class size maximum limits to all grades/classes from Kindergarten to Level III. It is with this understanding and with these goals in mind that the NLTA can support Recommendations 5 and 7 as proposed by the Commission. We reject the Government's decision to revise the class size maximums proposed.

As for the Department's unwillingness to accept Recommendation 6, the NLTA has been informed that there will be a process, at the school level, to respond to emergent local circumstances. We believe that local conditions can be best addressed at the school level and we agree with Government's response to this recommendation.

It is also unacceptable that the class size maximums will not be applied to include Levels I-III as recommended by the Commission. During its consultation it was reported to the NLTA's Ad Hoc Committee through both individual teacher and joint staff submissions that class sizes often range from 30 students per class to as high as 50+ students per class in certain subject areas. It was recognized by the Commission that with such large numbers, both teaching methodologies and learning opportunities are often compromised. However, the Department of Education did not agree to implement the Commission's recommendations regarding class size maximums at all grade levels. The NLTA maintains that if class size limits were implemented, as stated by the Commission, both students and teachers would benefit at all grade levels. While the additional allocations anticipated in administration, specialists teachers, LRTs, etc, and the "needs-driven" assessment process outlined in Element II of the new model, it is critical that the class size issues in high schools be addressed.

The NLTA stands by its policy regarding students with special needs. It is our position that in order for these students to receive appropriate programming and services, that Pathway 2 count as two students for the purposes of establishing class size maximums; Pathway 3 count as three, etc. Good teaching and good learning requires quality time and direct professional contact.

Smaller Schools

RECOMMENDATION 8

That all schools with student enrolments of fewer than 15 full-time students be allocated a minimum of two teachers.

(Not accepted by Government)

RECOMMENDATION 9

That there be a retention of the 2.5 teacher minimum allocation for these schools [greater than 14, but less than 23].

(Not accepted by Government)

RECOMMENDATION 10

That there be a continuation of the present small High School Program Teacher Allocation Override.

(Not accepted by Government)

RECOMMENDATION 11

That a hard, class size cap of 25 be used to determine the teacher allocation for mid-size high schools.

(Not accepted by Government)

According to statistics obtained by the Commission, “there exists a vast discrepancy in school size” (p. 89) throughout our province. Approximately one-half the schools in both the Eastern and Labrador School districts have student enrolments in excess of 300 students, while approximately 79 per cent and 75 per cent of the schools in the Western and Nova Central Districts, respectively, have enrolments below 300 students. “All districts, due to geographic and demographic variables, have school enrolments with more than 50 students and less than 100 students” (p. 90). It became very clear during the consultation process that small schools have their own challenges, especially when it comes to the administrative and teaching responsibilities at the school level and the ability of the school to offer a reasonable program to its students. Because of low enrolments and the expectation of diverse program offerings at the school level, teaching resources allocated under the old formula often caused teachers to be stretched beyond their capacities. According to the Commission, “assigning a single teacher to provide the entire curriculum in a school is unreasonable and not based on sound educational principles.” (p. 90).

Given the variety of challenges encountered in small schools, the Commission suggested four recommendations that would assist in addressing the teacher allocation concerns. The NLTA supports the Commission’s Recommendations 8, 9, 10 and 11. The Department of Education has not accepted these recommendations. However, to address the concerns that were expressed by the Commission regarding schools with enrolments of less than or equal to 25 students, the Department has agreed under its new allocation model to implement a “needs-driven/school-developed” allocation process, as suggested in Element II, and will be based strictly on School and District Planning initiatives. Also, for high schools with enrolments less than or equal to 42 students, teachers will be allocated on a needs-driven, school-based program, in consideration of the programs that can be reasonably delivered at the school level, as well as those that can be offered through access to the Centre for Distance Learning and Innovation (CDLI). While we recognize the value and validity of this delivery mode, we will not support an over reliance on CDLI courses. CDLI must be used to complement and supplement the delivery of programs in the school system; however, it must not be used as a replacement. These processes will be monitored by the NLTA and any concerns forthcoming from small schools will be directed immediately to the Department of Education.

Student Resource Teachers

RECOMMENDATION 12

That the allocation phase shall include all teacher units and that the current individual application process outside the Teacher Allocation Model would cease. The Department of Education would allocate special needs teachers to school boards for deployment on a revised ratio.

(Accepted by Government)

RECOMMENDATION 13

That the teacher allocation to school boards provide 11 Student Resource Teachers per 1000 students. The qualifications required for these teachers would be the same as currently exist for the categorical and non-categorical special education teachers.

(Accepted by Government)

(The NLTA reserves the right to comment further on this recommendation after consultation.)

RECOMMENDATION 14

That the Department of Education provide immediate consideration to any such emergent request from a school board. An emergent request is one that was not known or anticipated by the school board's director of education during the annual Teacher Allocation Review.

(Accepted by Government)

RECOMMENDATION 15

That within three years of the implementation of these Student Resource Teacher allocations, a review of the efficacy and efficiency of this allocation be undertaken.

(Accepted by Government)

“Diverse student needs propose diverse challenges for appropriate resources, professionals, and methodologies.” (p. 93). This theme is common through this report, as well as throughout the recently released *Focusing on Students*, the Report from the Ministerial Commission Review of the ISSP/Pathways Model. According to the Teacher Allocation Commission, an “enhanced teacher allocation is unavoidable if the system is to be able to respond to exceptional individual learning or student behavioral needs.” (p. 93). The current allocation formula allocates 7 teachers per 1000 students to each school district for non-categorical special education, as well as a number of categorical teachers which are deployed solely on the basis of an individualized application process. Given the many concerns that were identified by the Commission, including “the need for remedial services, literacy and numeracy instruction, classroom disruption, and various administrative or support issues”, an increase in the number of Student Resource Teacher units, coupled with the elimination of the often detailed and frustrating application process should improve the ISSP/Pathways Model. In addressing these two areas of concern, the Commission made the above Recommendations 12 and 13 which have been accepted by the Department of Education and theoretically when implemented, should result in more special services teachers in our schools and less paper work and fewer delays in getting them there.

However, in analyzing the application of these recommendations, the NLTA has some reservations regarding the new allocations proposal. First of all, early indications suggest that calculations based on a ratio of 11 per 1000 may not increase the number of special services teaching units. In some cases, it may even result in a reduction of the number of teaching units available to a school for special services deployment when compared to the old allocation formula. Secondly, calculating the allocation for special services teachers solely on the number of

students enrolled at a school is a direct contradiction to the over-riding theme of the newly proposed allocation model that has been accepted by the Department in recommendations 1 to 4 in the Commission's report; a model that is based on a needs-driven approach rather than on numbers. However, given that Element II of the new model provides the administration of a school with the opportunity to request additional resource teachers, then we have to await the outcome of this process.

The NLTA supports the Commission's Recommendations 12 and 14. We reserve the right to further consult with schools to ascertain whether or not the new formula of 11 per 1000, as suggested in Recommendation 13, will actually increase the total units available for special service personnel and result in improvements to the system to better address the needs of students who require such services. While we agree in principle with Recommendation 13, we predict that we will encounter problems in individual schools when combining all special services personnel under one allocation model. This may be particularly true in schools with students who require one-on-one attention during the school day.

Are the efforts of Government to implement the recommendations of both Commissions to be synchronized? The NLTA expresses concern that if this is not the case, students may not reap the potential benefits of these two Commissions.

“Expert” Teachers

RECOMMENDATION 16

That at the elementary level, specialists be allocated on the basis of one per 125 students to support the areas of music, physical education, fine arts, French, and literacy and numeracy.

(Accepted by Government: Revised ratio for K-Level III of 1:175)

The NLTA takes exception to the term “expert teachers” and will use the term “specialist teachers” to refer to those who teach music, physical education, fine arts, French, literacy, and numeracy. It is our opinion that all teachers are “experts” and to use the term “expert” to distinguish specialist creates an unnecessary impression of elitism or superiority.

Improvements to and the creation of a specialist teacher allocation for the entire Kindergarten to Level III grade levels are long overdue and much appreciated. Currently, there is no specialist teacher allocation for K-6 and a ratio of 1:250 is used to determine the specialist allocation at the Grade 7-Level III area. Under the new allocation model, the allocation for specialist teachers will be increased to 1:175 for all grades K-Level III and be adjusted in accordance with a “rounding mechanism”, as outlined in the report at page 105. As with other allocations, if the “initial allocation” is not sufficient to meet the programming and student needs of the school, the administrative team could provide a rationale for an increased allocation. This change should result in an overall increase to the number of specialist units in the system.

Given that Newfoundland and Labrador has a very rich culture and history steeped in traditional art and music, a recognition of the need to provide a separate teacher allocation to implement such an important educational program in the K to Level III curriculum is commendable. In addition, identified weaknesses in literacy and numeracy in early grades, as well as the need to improve and address the physical well-being of all students provide sound rationale for the allocation of specialist teachers throughout the entire K to Level III grade levels. The NLTA strongly endorses both the Commission and the Department of Education recognition of the necessity for an improved specialist teacher allocation for all grades K - Level III and supports Recommendation 16. However, the Association supports the Commission's recommendation of a 1:125 ratio, but regrets that the Department does not go far enough in putting principle into practice.

Further to this, in its own Program of Studies, the Government prescribes that programs covered by specialist teachers account for approximately 19% of the curriculum. The 1:125 ratio, as recommended by the Commission is more aligned with Government's own programming, rather than the revised ratio 1:175. This supports our position that Government must implement the Commission's proposal and not revise the ratio.

Grade 7 - Level III Specialists

RECOMMENDATION 17

That specialists be allocated from Grades 7 to Level III at the rate of one per 175 students to support the areas of music, physical education, fine arts, French, Centre for Distance Learning and Innovation (CDLI) support, and skilled trades/technology.

(Accepted by Government)

RECOMMENDATION 18

That the Department of Education provide computer technicians to the school system on a proportional basis similar to its technology support in Government line departments.

(Not accepted by Government)

The improved ratio for the allocation of specialists will have a positive impact on the ability to deliver programming in the specialist areas. For example, with an ever-growing concern on a future shortage of skilled trades and technology workers in our province, the Department of Education in recent years has focused much attention on and has channeled large sums of money into the K-Level III school system, especially at the intermediate and high school levels, in an attempt to address this issue. As a result of much needed planning and preparation in this area, the Department has developed a comprehensive program consisting of a series of course offerings at the senior high level. In addition to the skilled trades and technology courses available at the senior high levels, the Department has also implemented a series of learning modules for the intermediate grade levels that are specifically designed to the various technologies. Given these educational initiatives, the Department has realized the importance of allocating teaching units to implement these programs and have thus accepted Recommendation 17 as proposed by the Commission. Even though the ratio proposed by the Commission does not provide the same number of specialists as proposed by the NLTA, the NLTA can support this new allocation ratio for specialist units at the intermediate and senior high levels, with an understanding that if the ratio is not sufficient to meet the needs in the system, the Department will improve the ratio to address the identified needs.

With an increased use of computers, computer networks, and information and communication technologies across the curriculum and in most schools throughout the province, there is an ever-increasing need to allocate sufficient resources to maintain the hardware and software and deal with problems as they arise. Even though this necessity has been recognized by the Commission, the Department of Education did not accept the Commission's Recommendation 18. In consultation with Department officials, we were advised that there was a direct allocation of funds to Districts (approximately \$1.0 million) in the 2007-08 budget to address these concerns. However, we understand that much of the equipment and network maintenance is still being completed during the school day and/or at the end of the school day by a regular classroom teacher and/or a computer technology teacher and/or the learning resource teacher. This maintenance necessity should not be the responsibility of a teacher. It is the responsibility of a technician. Teacher time can be better spent on teaching and learning activities and on network administration. Therefore, we support the Commission's Recommendation 18 and will continue to advocate for improvements in this area.

School-Wide Specialists

RECOMMENDATION 19

That learning resource specialists be allocated at a level of one per 500 students from Kindergarten to Level III.

(Accepted by Government: revised ratio for Kindergarten to Level III of 1:750)

RECOMMENDATION 20

That guidance counsellors be allocated at a level of one per 333 students for Kindergarten to Level III.

(Provisionally accepted by Government pending a review of the role of the guidance counsellor)

The role of both the teacher-librarian and guidance counsellor have changed considerably in recent years. The introduction and application of information and communication technologies in a library setting have resulted in the creation of an electronic resource center. The change from a text-based curriculum to a multi resource-based curriculum have caused teacher-librarians to change their approach when assisting students with research topics and aiding teachers with the preparation and delivery of supplementary materials and lesson plans to be used in the classroom. Even though these changes have been very challenging and demanding, the number of teacher-librarians (or learning-resource teachers) has decreased in recent years and students and teachers have not reaped the potential benefits that the resource supports could provide. It was pleasing to see that the Department of Education agreed with the proposal in Recommendation 19 to increase the current allocation of LRTs, however, again we are disappointed that the Department did not agree with the ratio proposed. Therefore, the NLTA supports the Commission's ratio of 1:500 and rejects Government's plan based on a revised ratio. By implementing the Commission's ratio, over 50 per cent of schools in the province would see an increase in their LRT allocation. With Government's proposal of 1:750, fewer than 35 per cent would benefit from the adjusted allocation.

Like teacher-librarians, the role and demands that have been placed on guidance counsellors in recent years have also changed and expanded considerably. Guidance counsellors are now expected to assist students with "career planning; comprehensive student assessments; scholarship and post-secondary application procedures and information; drug and alcohol awareness; personal counseling; anti-bullying programs; and mediation" (p. 111). In addition to these responsibilities, guidance counsellors also play a key role in school-community relations with various community agencies; government departments; hospitals; regional economic development groups, etc. With these increased responsibilities, the Commission concluded that there was a need to improve the guidance counsellor allocations from the current ratio of one to 500. The role of guidance counsellors was also raised by the ISSP/Pathways Commission. In consideration of this, the Department has agreed to maintain the current allocation ratio while at the same time commit to reviewing and defining the role of guidance counsellors. With that commitment is an underlying principle that if the review should reveal a need for an improved ratio, the Commission's recommendation will be reconsidered. Although the Department has decided to maintain the current allocation while it conducts its review, the NLTA supports the Commission's Recommendation 20. The NLTA also feels strongly that it should be part of the pending review and proposes that it be granted representation on any Department of Education committee or panel that might be established to conduct such a review.

Early/Late Immersion

RECOMMENDATION 21

That the provincial class size maximums apply to English, French Immersion, and Intensive Core French classes for teacher staffing purposes.

(Provisionally Accepted by Government pending Review of the Application of Element II)

As indicated by the Commission, Early and Late French Immersion programming often creates an “unfair imbalance within the dual stream, French Immersion and English schools with respect to class size and teacher allocation” (p. 114). In response, the Commission recommended that adequate staffing resources are necessary in order to create appropriate class size maximums for both streams. The NLTA likewise recognizes these imbalances and therefore supports the Commission’s Recommendation 21.

Minority French-Language Education

RECOMMENDATION 22

That a French first-language director or manager position be provided at the Department of Education to promote, protect, and strengthen French first-language education.

(Not accepted by Government)

Given that French first-language programs have a dual mandate in the minority language environment to provide an educational program and to promote and support the linguistic and cultural community, the Commission proposed the creation of a position at the Department level that would be devoted entirely to the development and expansion of the program. This dual role has within it unique and severe challenges which have been documented through extensive research carried out by the Canadian Teachers’ Federation. Consequently, the NLTA supports the Commission’s Recommendation 22. Unfortunately, the Department of Education has not accepted the Commission’s proposal, contending that the current position of Manager of Language Programs will continue to address the issues identified by the Commission.

English as a Second Language (ESL)

RECOMMENDATION 23

That the current ESL model for teacher allocation be revised to base the allocation upon student enrolments in April of the immediately previous school year and that the base numbers be adjusted to provide a 0.50 teacher unit for every 15 ESL students registered.

(Provisionally accepted by Government: process currently under review)

During its consultation process, the Commission heard a number of concerns regarding the “ineffectiveness of the current allocation model for ESL programming” (p. 115). Even though ESL enrolments are unpredictable from one year to the next, recent trends indicate that the program is expanding at a much greater rate than expected and thus the current allocation formula is inefficient in providing adequate resources to address the demand. Furthermore, with Government’s new immigration policies, it is reasonable to assume that the demand for ESL services will increase. ESL allocations are currently provided on a year-by-year basis taking into account the enrolment at the beginning of the school year. As a result, long-term planning and permanent teaching positions which could provide continuity from one year to the next is prohibited. In order to address these

concerns, the Commission has recommended changing the allocation process so as to better reflect the realities of the program, to better serve the needs of some of our most vulnerable students and to respect the professionals who deliver this program.

The NLTA recognizes that teachers of ESL have responsibilities which go well beyond the teaching of English. Many of the students enrolled in these programs come from very difficult circumstances. They are often the orphans of war, famine and disease and have experienced severe trauma. Their exceptional circumstances require exceptional levels of care and support. This care and support is usually the added role of the ESL teacher. She or he is not only the teacher, but the counsellor, the advocate and the surrogate parent.

The NLTA is fully supportive of the spirit of this recommendation, however, cannot agree with the allocation of “0.50 teacher units for every 15 ESL students”, as proposed. Under the current staffing regulations, the Department allocates one teaching unit for the first 15 students; a second unit for 36 students; and an additional teaching unit for every multiple of 35 students thereafter. However, given the increased demands that have been placed on the ESL program, Government’s current ratio must also improve.

Speech-Language Pathologists (S-LP)

RECOMMENDATION 24

That the Department of Education ensure that speech-language pathology preparation programs are expanded to correspond with the growing needs of the education system, ensuring adequate numbers of graduates are available.

(Provisionally accepted by Government pending further consultation with the Department of Health)

RECOMMENDATION 25

That the speech-language pathologists’ caseload in the education system should correspond more closely to the national standards recommended by the Canadian Association of Speech-Language Pathologists.

(Provisionally accepted by Government pending further consultation with the Department of Health)

The Ad Hoc Committee appointed to prepare the NLTA’s submission to this Commission received a number of submissions from Speech-Language Pathologists. Throughout the province concerns were raised with respect to the significant shortage of trained professionals in this area and the unreasonable caseloads and impossible expectations of those who are employed in the school system. After much discussion and consultation with the Canadian Association of Speech-Language Pathologists and Audiologists (CASLPA), the Commission attempted to address these concerns through Recommendations 24 and 25, both of which the NLTA supports.

The Department of Education has accepted both recommendations. However, due to the unavailability of Speech-Language Pathologists and the need to further consult with the Department of Health regarding the possibility of consolidating Speech-Language Pathologist services, these recommendations have been temporarily placed on hold. On behalf of Speech-Language Pathologists currently employed in the system, we ask that this consultation occur as expeditiously as possible.

Administration

Principals

RECOMMENDATION 26

That the following formula be used to allocate administrative time to schools:

Old Allocation	
Number of Pupils	Admin FTE
1 - 74	0.25 units
75 - 149	0.5 units
150 - 249	0.75 units
250 - 399	1.00 units
400 - 549	1.25 units
550 - 699	1.50 units
700 - 849	1.75 units
850 +	2.00 units

Commission's Recommendation	
Number of Pupils	Admin FTE
1 - 74	0.5 units
75 - 174	1.00 units
175 - 249	1.25 units
250 - 399	1.50 units
400 - 549	1.75 units
550 - 699	2.00 units
700 - 849	2.50 units
850 +	3.00 units

(Accepted by Government)

RECOMMENDATION 27

That the Department of Education, in cooperation with the Newfoundland and Labrador School Boards Association and the Newfoundland and Labrador Teachers' Association, provide a protocol to ensure the continuous growth and development for school administrators.

(Accepted by Government)

During their travel throughout the province, the Commissioners heard a common message: "the principal strongly influences the climate and effectiveness of a particular school" (p. 118). In order to substantiate this message, the Commissioners also relied upon the research findings of an internationally renowned educational researcher, Dr. Kenneth Leithwood. Dr. Leithwood concluded in a research study that he and a group of colleagues conducted in 2004 that "the link between the role of the school administration and learning is quite significant" (p. 119). The Commissioners also heard clearly just how much the role and responsibilities of the school administrators have expanded in recent years and how inadequate are the human resources, the professional development opportunities, and the time available to address the demands of the position. As a result, the Commission has recommended increases to administrative units allocated to the schools, as well as the need for school districts and the NLTA to cooperate in addressing the professional development needs of school administrators.

The Association recognizes that the Commission's Recommendations 26 and 27, and Government's acceptance of these recommendations, would improve administrative allocations and support for administrators for some schools in the province. It does not, however, address the needs of the most vulnerable schools with the smallest populations. Often the administration of these schools are also responsible for teaching a wide variety of programs and there is a higher demand on the school as a community resource centre, both of which have implications for school administration. We reject the administrative allocation for the 1-74 at 0.5 units and strongly recommend to Government that the ratio be improved to 1-49 at 0.5 units and 1.0 units for schools with populations of 50-174 in recognition of the particular needs of small schools.

Furthermore, with respect to the Commission’s Recommendation 27 regarding “the continuous growth and development for school administrators”, we strongly believe that the concept of school leadership is not only synonymous with the positions of administration. We must recognize the potential of and support the development of capacity in the school beyond those in the role of principal or assistant principal. We therefore advocate for increased professional growth opportunities for all teachers, and that this professional development be, in part, teacher directed.

School Level Support: Program Specialists

RECOMMENDATION 28

That program specialists be allocated to school districts in one of two general forms. These are distinct grade/curriculum discipline specialists or district-wide program implementation specialists. **(Provisionally accepted by Government pending further review)**

RECOMMENDATION 29

That the following table be used to determine the allocation of program specialist positions in each district:

District	# of Program Specialist Positions
Labrador	9
Western	16
Central	16
Eastern	25
CSF	Existing Arrangement

(Provisionally accepted by Government pending further review)

“Class size reductions, specialist teacher allocations, and the provision of meaningful administrator time to enable onsite instructional leadership” (p. 123) should enable the main players in the educational endeavour, teachers and administrators, to better address the individual needs of students. However, just as important, is the recognition of the need for individuals to coordinate both the skill and professional development of teachers and the coordination of special services for students. These requirements have over the years been the responsibility of program specialists. In the past, program coordinators were employed by Boards on a subject-based criterion. However, as the role changed, so did the term used to describe these individuals, as well as the criterion on which they were allocated. The term used to describe these individuals became “program specialists” and the allocation, for the most part, changed from subject-based to levels-based, e.g. Primary/Elementary, Intermediate, and High School. In addition to these program specialists, additional units were allocated for specific purposes, such as Student Support Services and School Development. There have been many discussions and debates over the issue of whether program specialists should be allocated on a subject-based or levels-based criteria, however, in the final analysis it seems that both are needed in the school system. Recommendations 28 and 29 as proposed by the Commission have been provisionally accepted by the Department, pending further review. The NLTA supports the intentions of the Commission’s Recommendations 28 and 29 and will insist upon involvement in any such review. We contend that consideration will need to be given for both curriculum and levels-based specialists since it would be unreasonable for anyone to be expected to have broad-based curriculum knowledge along with the particular issues relative to specific levels.

School District-Level Support: Education Officers

RECOMMENDATION 30

That Instructional Education Officer positions be established to support student achievement, school leadership, and school development and be provided based on the following table:

Number of Pupils	Education Officers for Instruction
Up to 5,000	1
5,000 - 20,000	3
20,000 - 30,000	4
30,000 - 40,000	5

(Accepted by Government)

The most recent efforts to reorganize and consolidate school boards and the services they provide throughout our province have placed additional strain on an already stressed system. While we are small in student enrolment and general population, our geography places the school districts in our province amongst some of the largest in Canada. Given everything that school boards, program specialists, school administrators, school staffs and individual teachers have been tasked to do, additional human resources are imperative if student achievement and good, consistent teaching practices are to be maximized. As a result, “the Commission views the learning organization as a multi-tiered structure” (p. 127), with students and teachers in the classroom as the foundation. In order to maximize the essence of education, i.e. the teaching and learning which occurs in the classroom, both in-school specialists, school administrators, and resource personnel from District office must all work toward a common goal. However, this is very difficult when there is currently no one tasked with overseeing this process. Because of this identified shortfall in the current system, the Commission has recommended that Instructional Education Officer positions be created in all school districts based on district-wide student enrolment numbers. Given that the roles and responsibilities of these individuals will be to work with those already in the system “to ensure long-range planning, accountability, school board and province level support, and goal alignment” (pp. 127-128) is achieved, the NLTA supports the Commission’s Recommendation 30.

Recruitment and Retention

RECOMMENDATION 31

That Government commence a teacher housing initiative in very isolated areas where teacher accommodations are a concern.

(Provisionally accepted by Government pending further review)

RECOMMENDATION 32

That the Department of Education and the provincial post-secondary institutions ensure that adequate graduates are available to fill specialist positions.

(Not accepted by Government)

RECOMMENDATION 33

That pre-service teachers be paid during their school internship to help offset the cost of student loans and allow them to be of further assistance to schools during their practicum, especially in rural areas.

(Provisionally accepted by Government pending further review)

RECOMMENDATION 34

That Government develop an incentive program to encourage recruitment and retention of teachers to isolated areas by developing a student loan debt-relief plan.

(Provisionally accepted by Government pending further review)

It is a reality in our province today that there are major problems recruiting and retaining professionals in many of our rural and isolated communities. The teaching profession is a prime example. Following the consultation process, the Commission concluded that “many rural schools have difficulty recruiting and retaining teachers, particularly specialists” (p. 129). It also concluded that “in education, a high teacher turnover rate has a detrimental effect on the quality of educational delivery.” (p. 129). Several studies over the years have identified “geographical distance and isolation and loneliness”; “workload”; and “multiplicity of roles, responsibilities, and duties which teachers in rural, remote, and isolated schools were expected to fulfill” (p. 130) as three of the most frequently listed challenges associated with teacher recruitment and retention. Other issues such as the lack of adequate housing or reasonable accommodations, the allocation of part-time positions to smaller isolated schools, and huge debt loads of new graduates entering the profession have also been identified as significant contributors to the recruitment and retention issues facing the education system in our province. The Commission has been quick to point out that new recruitment and retention incentives are vital to the survival and delivery of a quality education program in rural regions of our province and must be initiated sooner, rather than later, if we are to address these issues. Therefore, the NLTA supports the Commission’s Recommendations 31, 32, 33 and 34. We regret that Recommendation 32 was not accepted by Government. We feel that Government could and should be doing more to increase the opportunities to teachers who wish to pursue training in specialty areas. This may mean the provision of grants and other incentives, the purchasing of “seats” in specialist training programs, and find ways to expand the pool of specialists, particularly for hard to fill positions.

Appendix III – Other Issues

RECOMMENDATION 35

That the Department of Education communicates these comments to those concerned for further consideration in the provincial plans for educational growth and development.

(Accepted by Government)

During many of its consultation sessions and through many of the submissions it received, the Commission was provided commentary and suggestion on a wide variety of other issues that have been affecting the delivery of education in our province and the teaching profession in general. Even though many of the issues raised were outside the mandate of the Commission, the Commission felt it was necessary to include them in their report, accompanied with a recommendation to the Department of Education to start a dialogue with those stakeholders as it considers the short-term and long-term goals associated with the educational plan for the province. Given that most of the issues identified have direct implications for students and teachers, the NLTA supports in principle the Commission’s Recommendation 35 and looks forward to working toward addressing these. However, one critical area of school support staff was glaringly absent from the list and we will seek to have it added to topics for further discussion.

Some of the issues identified were:

- General Professional Issue
- Recruitment and Retention
- Geography
- Small Rural Schools
- School Environments
- Community
- Curriculum Resources
- Special Services
- Busing
- Pre-School
- Post-secondary
- Primary/Elementary
- Junior High/Senior High School
- Guidance Counsellors and Educational Psychologists
- Multi-grade/Multi-course/Multi-age
- Teacher Allocation and Deployment
- District Office
- Centre for Distance Learning and Innovation (CDLI)

Conclusion

There were 37 recommendations in the NLTA's submission to the Commission on Teacher Allocation. Some of these were explicitly addressed in the Commission's report; others are inherent in the Commission's recommendations or are dealt with implicitly. Some of our recommendations, unfortunately, were not addressed at all. We will work with Government and Districts toward the successful implementation of this new Teacher Allocation model. We will continue to advocate for improved ratios where applicable and to have action on those recommendations which were not supported by Government, but which we endorse. Where actions are on hold pending reviews or study, we will advocate for a place on any committees or working groups so that the NLTA position is represented. In brief, we will continue to advocate for what we believe is best for students and teachers, with the knowledge and understanding that this will ultimately be best for the system as a whole.

Part of the model during the Commission's working period was to have in place an Advisory Board. In this critical implementation phase, the NLTA feels strongly that Government should continue to be advised by the committee and that there be an ongoing review of the process as it unfolds. Stakeholders should then be brought together in a forum to formally evaluate the new model as it is applied and its impact on "teaching and learning, the essence of education".

In its conclusion, the Commission cited the words of a well known poet evoking the analogy of education as a journey. It is indeed a fitting metaphor. The famous Chinese philosopher, Confucius, said, "The journey of a thousand miles begins with just one step." The first step to reaching our goal of having a means of teacher allocation which is needs-driven, school-developed and community sensitive was taken many years ago, with the first call for change. The establishment of the Commission, its report and Government's response have moved us further along in this journey. We are pleased that we are moving in the right direction, but mindful that there is still a ways to go to reach our destination.