



TEACHING AND LEARNING

The Essence of Education

A Submission to the Teacher
Allocation Review Commission
by the Newfoundland and
Labrador Teachers' Association

November 2006

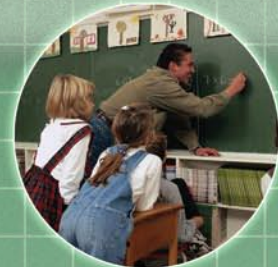


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Introduction

The Newfoundland and Labrador Teachers' Association (NLTA) welcomes this opportunity to have input into the Commission's considerations for re-visioning the way teachers are allocated to students, classrooms and programs in this province. At the outset, we were encouraged by the Commissioner's explicit detailing of the fact that your work would be guided by what is right and good for teaching and learning. These foundational principles also guide us as a professional association. We are hopeful that you will maintain this focus and remain firm so that it will not be overridden by any other factor. While we respect the need for a responsible and realistic view of the challenge, we remind you that excellence comes with a price tag, and for the students and teachers in this province we can afford nothing less.

In preparing our submission, we put in place a process which allowed for extensive input from teachers throughout the province. Individuals were invited to make submissions to us. Despite their extremely busy schedules, more than 600 teachers from all regions of the province took time to give us their suggestions. This speaks volumes about the importance of this issue, not only to us as a representative organization, but also to individual teachers who are living with the realities of the current way of deploying our most valuable resources – our human resources.

As part of the preparation for this submission, the Association appointed a special Ad Hoc Committee, chaired by the Vice President of the NLTA and consisting of 10 members: four school administrators – one from a primary/elementary school, one from an intermediate/junior high school, a senior high school administrator, and a school administrator from a small, but necessarily existing K-12 school; a program specialist; a classroom/specialist teacher; a specialist teacher; and two NLTA Staff Officers.

The Committee was provided with the following *Terms of Reference* as their mandate:

- To review past positions of the NLTA, including submissions and briefs on teacher allocations;
- To solicit input from members regarding teacher allocations, to the extent possible within the time constraints for input to the Commission;
- To prepare, for recommendation to the NLTA Provincial Executive Council, the NLTA submission to the Commission to Review Teacher Allocations; and
- To promote and support input to the Commission by members of the NLTA, branches and special interest groups.

During the process, the Ad Hoc Committee held two full days of consultation and discussions, including an information session with the Commissioner of the Teacher Allocation Commission, Mr. Brian Shortall, and Vice Commissioner, Ms. Noreen Greene-Fraize.

References and Background Sources

A number of relevant documents were reviewed to provide background and content to our analysis.

- 1) the *Terms of Reference* of the Commission;
- 2) the following documents from the NLTA: *Pre-Budget Public Consultation* - Brief Presented to Honourable Loyola Sullivan (January 2005); *Putting the Teacher Back Into Teaching* (September 2003); NLTA Response to *Supporting Learning* (May 2000); and the NLTA's submission to the Ministerial Panel on Educational Delivery in the Classroom (May 2000);
- 3) Dr. Lynda Younghusband's Ph.D. thesis, *High School Teachers' Perception of Their Working Environment in Newfoundland: A Grounded Theory Study* (May 2005);
- 4) Dr. David Dibbon's Ph.D. study, *It's About Time!! A Report on the Impact of Workload on Teachers and Students* (2004);
- 5) Dr. David Dibbon's and Dr. Bruce Sheppard's report, *Teacher Demand, Supply and Retention in Newfoundland and Labrador* (2001);
- 6) the Sparkes-Williams report, *Supporting Learning: Ministerial Panel on Educational Delivery in the Classroom* (2000);
- 7) the *2005-06 Education Statistics* published by the Department of Education;
- 8) Program of Studies 2006-07: Kindergarten, Primary, Elementary, Intermediate and Senior High, Department of Education;
- 9) the NLTA policy on "Teacher Workload";
- 10) the NLTA Opening Proposals on Article 29: Workload and Article 30: Class Size as presented to the Provincial Government's Negotiation Committee in its opening package during the most recent round of Provincial negotiations on a new collective agreement;
- 11) the Canadian Teachers' Federation (CTF) *Economic and Member Services Bulletin*, "Teacher Recruitment and Retention: Why Teachers Enter, Stay or Leave the Teaching Profession" (October 2004); and
- 12) the input received from approximately 600 questionnaires completed by individual teachers throughout the province.

Supporting Research

As a teachers' association, we have a legislative responsibility to represent the interests and address the concerns of our membership. The fact that our position is based on membership input gives it inherent legitimacy. However, we add strength to our position when we can defend these interests and our recommendations with relevant research.

ON COMMUNITY

The *Globe and Mail* of October 11, 2006, headlined the fact that 62% of parents tell pollsters that assisting their children with homework is beyond them.

Dr. Kenneth Leithwood, a respected educational researcher at the Ontario Institute for Studies in Education, has written extensively about family educational culture. To quote:

Student learning is enhanced when it is supported by both the school and the family. When families are able to provide academic guidance and support for their children, when they provide time and resources so that children can do their work, when they can ensure that their children are healthy and ready to learn, and when they have high expectations for their children's learning, they have what can be termed strong family educational cultures.

What We Know About Successful School Leadership
K. Leithwood and C. Reihl, January 2003

This begs the question as to what happens when there is not a strong family educational culture. It is our contention that community profiles regarding socio-economics status, literacy rates and level of services in the community should be considered in any teacher allocation model. When the family educational culture is deficient or non-existent, additional onus is placed upon the school.

ON PROFESSIONAL LEARNING COMMUNITIES

Professional learning communities are communities of continuous inquiry and improvement (Hord, 1997). Dr. Michael Fullan, widely recognized as an international authority on educational reform, endorses the importance of schools functioning as learning communities. In all of the literature, there are various definitions of "professional learning communities"; however, there are common elements in that the term "professional learning community" always describes a collegial group united in a commitment to student learning. This plays out when teachers have shared vision, can work collaboratively, can visit and review other classrooms and participate in decision making (Defour and Eaker, 2002). This concept of the professional learning community is one which is being promoted in this province through the school development model; however, if teachers are to actually participate in a collegial model where they work collaboratively, where they can review and reflect upon their work, an allocation of time will be required, not only outside of the school day, but within the working day. This supports our contention that there needs to be unscheduled time for teachers within the school day.

ON RIGHTS

The right to education is a fundamental human right. It occupies a central place in human rights and is essential and indispensable for the exercise of all other human rights. The United Nations Educational Scientific and Cultural Organization (UNESCO) contends that achieving the right to basic education for all is one of the biggest moral challenges of our times. Interestingly, UNESCO's statement is made in the context of developing countries.

In Newfoundland and Labrador, Section 3 of *The Schools Act* guarantees the right of access to education; however, we must question whether that education is one which is basically fulfilling our obligation under the law, or whether it is one which is providing a path to excellence. In a press release following the Williams' 2006 budget (March 30, 2006), Education Minister Joan Burke, said:

Education is the key to identifying and developing cutting-edge opportunities and to ensuring that Newfoundland and Labrador has the available work force to meet exciting new opportunities.

If indeed education is the key to our exciting new future, then we must ensure that it is an education of excellence, not an education of mediocrity.

ON TRENDS

In the Canadian Teachers' Federation's *National Issues in Education Poll* the following reasons were given by teachers to explain why they leave the profession:

- 64% High level of stress
- 48% Hours of work too long
- 44% Too much "administrivia" – not enough teaching
- 40% Inadequate resources (material, financial, support personnel)
- 36% Too many students with special needs
Too many students with behavior problems
- 32% Lack of professional support
- 28% Class size too large
- 20% Parental harassment
Lack of administrative support in dealing with difficult students
Family or other personal commitments
Health problems
- 16% Constantly changing curriculum
- 12% Wages too low
No opportunity for advancement
- 8% Was not adequately prepared for the "realities" of teaching.

According to the 2004 results, Canadians blame overcrowded classrooms and stressful workloads for the loss of new teachers. (Canadian Teachers' Federation *Economic and Member Services Bulletin*, "Teacher Recruitment and Retention: Why Teachers Enter, Stay or Leave the Teaching Profession", October 2004)

NLTA's Proposal

As we read and analyzed the responses from teachers and the various research documents, it became abundantly clear that no one teacher allocation model adequately responds to the variety of circumstances in our province. It is our position that there are a number of factors which singularly, and in their interaction, should be considered when allocating teachers. These factors range from those that have their basis in principle and the research on what is best for teaching and learning, to those of a very practical nature. While they are all important, it is fair to say that in the past the focus has primarily been on the numbers-driven, practical approach at the expense of the principles or best practices.

It became clear early in the process that major changes are required and a new approach to the teacher allocation process is necessary if we are to attain excellence in teaching and learning, the essence of the educational endeavour. It was also apparent that teaching and learning are most effectively implemented when the needs of the students are identified and sufficient resources, both human and physical, are provided. It is our conclusion, based only on the evidence, that a formula based on student enrolment does not work. We must consider the needs of each individual student if we are to develop a human resources allocation that best addresses the real needs of the classroom.

The NLTA is advocating for a new approach based on the principle that teacher allocations should be needs-driven/school-developed and community sensitive. We have also determined a process by which this should occur.

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).

If our province is to move forward, and if education is to be the vehicle for that forward momentum, then this principle must be the primary focus on which any new process is founded.

NLTA's Response to the Commission's Terms of Reference

During the information session that was held with the Commissioners, it was suggested that the Commission's *Terms of Reference* be classified into four main focus areas:

- I. Administration/Class Size;
- II. Government Initiatives;
- III. Equity in Educational Opportunities; and
- IV. Human Resources/Recruitment Issues.

The remainder of this document will categorize each of the statements that are referenced in the Commission's *Terms of Reference* into these four main focus areas. Where necessary, it will indicate the concern or inefficiency which currently exists with the teacher allocation formula and provide reasonable and practical recommendations that the NLTA strongly believes will improve the way that resources are allocated to the students and teachers who work together in the classrooms throughout our province. As well, recommendations on other issues as identified by teachers will also be addressed.

NLTA's Recommendations on Administration/Class Size

In the Commission's *Terms of Reference*, there is a recognition of Government's commitment to:

- limiting K-6 class size to 25 or less, one grade level at a time, by 2010;
- investigating the current practice of dividing teaching units into small incremental percentages (e.g., 70% teaching, 20% administration, 10% guidance);
- making provisions within the model to meet unexpected/emerging needs each school year.

In order for these commitments to become a reality, the NLTA makes the following recommendations:

RECOMMENDATION 1

That every school have a school administrator or an administrative team with sufficient time allocated during the school day for the persons employed in such positions to address the administrative needs, responsibilities and obligations associated with the operations of the school.

RECOMMENDATION 2

That the allocation of school administrators be completely separate from the allocation of other teaching units. This allocation should not be included in determining the pupil-teacher ratio, unless the administrator has teaching responsibilities.

Explanatory Note: Including full-time administrators and others in the system who provide much needed supports, such as Guidance Counselors, Non-Categorical Special Education Teachers, Learning Resource Teachers (LRTs), Program Specialists, Educational Psychologists, Speech Language Pathologists, and Itinerant Teachers for both the Hearing and Visual Impaired, skews the validity and accuracy of a true pupil-teacher ratio. The *2005-06 Education Statistics* reveals that the pupil-teacher ratio for the province was 13.4:1. As many as 20 to 25 percent of the current allocated units that are factored into the calculation of the pupil-teacher ratio are necessary support units in the system which do not have direct teaching responsibilities to classes or course groupings of students.

RECOMMENDATION 3

That the following criteria be included when determining the allocation of school administrative units: school configuration, total student enrolment, program offerings, community supports, and special needs students:

School configuration: K-3, K-6, K-9, K-12, 4-6, 4-9, and 9-12 schools *all* have different and unique needs.

Total student enrolment: *All* students who avail of educational services at the school should be included in determining the administrative allocation. Students who register for such programs as KinderStart, or foreign students who pay a tuition fee to enroll in programs in our school system, are currently not included in the Annual General Return (AGR) for the school. Obviously, the larger the school, the greater the need will be for an increased administrative allocation.

Program offerings: Administrative allocations *must* reflect the varying degrees of need that exist between schools with different program offerings. Schools that offer French Immersion programs, for example, should receive an additional administrative allocation since such programs add a new dimension of issues to the operations and administration of the school and to the maintenance of the program.

Community supports: In communities where there are very limited opportunities for students to participate in organized activities, there is an increased expectation and reliance on schools to meet this need.

Special needs students: The administrative allocation should reflect the added administrative responsibilities that are associated with developing, implementing and maintaining sufficient programs and resources to address the needs of students with recognized and/or documented exceptionalities.

RECOMMENDATION 4

That teachers occupying Department Head positions receive supports in the way of additional scheduled administrative time during the regular work day to complete their administrative responsibilities.

Explanatory Note: This recommendation is an extension of the recommendation made previously regarding school administrators (see Recommendation 1). No longer is it acceptable to expect Department Heads to perform the additional duties and responsibilities on their own time, after they have taught classes for a full day and the workday has ended. The additional time needed to perform their duties *must* be reflected in an overall increase in the teacher allocation in order to prevent a transferring of their teaching responsibilities to other teachers on the staff.

RECOMMENDATION 5

That Department Head designations and allocations be expanded to include Student Support Services and Technology programs offered in schools.

Explanatory Note: Given the dramatic increase in the number of students who have been assessed and documented over the past five to seven years with having some kind of exceptionality requiring some level of support, a Department Head administrative position for Student Support Services should be formally established and sufficient human resources be allocated to ensure the coordination of resources and ensuring that the ISSP program requirements at the school level are implemented.

RECOMMENDATION 6

That a core of 15 program specialists be allocated to each school district, with one additional program specialist allocated for every 5,000 students enrolled in the district.

Explanatory Note: Program specialist allocations were substantially decreased during the most recent school district restructuring fiscal exercise. These cuts have proven to be critical, especially to the delivery of much needed professional development and in-service training of new curriculum to teachers.

RECOMMENDATION 7

That a teacher network manager/administrator be allocated to a school where a computer network system has been installed.

Explanatory Note: Many of our schools today have sophisticated computer network systems that require constant monitoring and modifications. These network requirements are often a daily necessity in order to ensure that the use of technology is incorporated across the many curriculums and throughout the various grade levels. Given that most of the work that is required to maintain the network has simply become an additional, voluntary expectation placed on the technology teacher or some other teacher on staff who has skills in technology, the workload has become unrealistic and unmanageable. The results are often frustrated teachers, frustrated students, frustrated colleagues, and a system that is not working.

Regular Classroom and Specialists Allocations

The Provincial Government announced during its budget presentation in March 2004 its “commitment to limit K-6 class size to 25 or less, one grade level at a time, by 2010”. This commitment has been reiterated in subsequent budget speeches, as well as outlined in the *Terms of Reference* for the current Teacher Allocation Commission. Effective this current school year, the commitment should be implemented in Kindergarten to Grade 2. This is a very positive move on the part of the Provincial Government, and one which the NLTA supports in principle. However, as with several other initiatives from the past, this commitment is based solely on numbers rather than needs with no additional teaching units being allocated to support its implementation. As a result, a number of issues and concerns have arisen during the three-year implementation phase of this commitment. These concerns *must* be addressed during this teacher allocation review process.

To implement the proposed class size maximums, some schools have had to increase class sizes in other grades to allow the class sizes to remain below the 25-person cap in Kindergarten to Grade 2. This has created major workload problems for individual teachers who are responsible for grades above Grade 2 and has had a dramatic impact on the learning environments of students.

Teachers who currently teach at the K-2 grade level have supported the fact that smaller class sizes create an improved teaching and learning environment. However, these teachers are very quick to point out that there are other factors beyond the number of students in the classroom which must be considered. A critical factor is classroom composition, i.e. the abilities, the exceptionalities, and the educational needs of each individual student in the classroom, as well as the level of resources and supports that are necessary for effective teaching and learning to occur. In other words, the needs of the classroom *must* be the driving force which determines the maximum number of students that should be grouped in a classroom or course and thus the minimum number of teaching units that *must* be allocated to each school to ensure that the needs of the students are met.

In response to Government’s “commitment to limit K-6 class size to 25 or less, one grade level at a time, by 2010”, the Association makes the following recommendations:

RECOMMENDATION 8

Class Size/Class Composition

That a class size limit be fully implemented at *all* grade levels and in *all* classes/courses from Kindergarten to Level III inclusive, effective September 2007 using the following criteria:

Kindergarten to Level III

The maximum class size for Kindergarten be reduced to 12 students or less and the maximum class/course size for Grades 1 to Level III be established at 20 students or less.

Class Composition

The composition of each class, i.e., the needs of individual students, be a major factor on which class size is determined. Students with greater needs require additional time and instructional support, therefore the Association recommends the following criteria for determining class size:

- Students deemed as Pathways 2 students shall be counted as two pupils in determining maximum class size;
- Students deemed as Pathways 3 students shall be counted as three pupils in determining maximum class size; and
- Students deemed as Pathways 4 students shall be counted as four pupils in determining maximum class size.

Multi-age/Multi-course Groupings

Where it is necessary to combine two or more grades or courses in one class with one teacher, the maximum class size for such combined classes shall be as follows:

- Kindergarten to Grade 3 – 12 students or less;
- Grade 4 to Level III – 15 students or less.

Instructional Delivery by E-learning

The maximum class size for any course or program delivered by e-learning (e.g. distance education, web-based, etc.) should be 20 students or less. Also refer to recommendations 21, 22 and 23.

RECOMMENDATION 9

Preparation Time

That the allocation of teacher units to each school be adequate to ensure that *all* teachers, regardless of grade level or program taught, receive on average throughout the instructional cycle, a minimum of 60 minutes of preparation time during each instructional day.

Explanatory Note: Dr. David Dibbon's report, *It's About Time!! A Report on the Impact of Workload on Teachers and Students*, states: "Working to ensure adequate preparation time for teachers seems like a sensible strategy to combat unreasonable workloads – a strategy that would likely result in a reduction in teacher attrition and an increase in retention levels." (Pg. 16)

RECOMMENDATION 10

Minimum Allocation

That the minimum portion of any teaching unit allocated to a school be 50%.

Explanatory Note: It is very difficult to attract qualified candidates to fill positions that are advertised as less than 50%. It is also difficult to effectively schedule these units within the overall school schedule.

RECOMMENDATION 11

Learning Resources

That every school receive a separate allocation for a Learning Resources Teacher (LRT), based on the programming needs of the outcomes-based curriculum that is implemented in the school.

Special Needs and Guidance Services Allocations

The following *Terms of Reference* outlines Government's commitment to:

- providing appropriate levels of special education services, while supporting inclusive educational practices;
- improving career/guidance counseling; and
- increasing the high school graduation rate.

In order to ensure that the above commitments are honored, the NLTA makes the following recommendations.

RECOMMENDATION 12

That the allocation of non-categorical teacher-student ratio be increased from the current 7:1000 to a minimum of 10:1000.

Explanatory Note: In order to address the concerns that have been identified in each school, as well as to provide remedial students (current Pathways 2) and students requiring modified programs (current Pathways 3) with the assistance they require and so deserve, this is a reasonable and necessary adjustment to the current formula. Currently, students who require remedial interventions and modifications to programming are not included in the non-categorical teacher allocations and this additional responsibility is passed on to the regular classroom teacher. Without this much needed assistance, certain students are unnecessarily at risk. If we are to

increase the high school graduation rates in this province, the non-categorical teacher allocation must be increased to ensure that the at-risk students and those requiring remedial assistance and modifications receive the attention they require in order to be successful and to meet graduation requirements.

RECOMMENDATION 13

That every student who has an identified and/or documented exceptionality be granted resources and supports as determined by the school's Individual Services Support Plan (ISSP) team as early as possible in their schooling. In addition, these resources and supports *must* continue to be provided until such time as is deemed unnecessary by members of the child's ISSP team at the school level. (See also Recommendations 18, 19 and 20.)

RECOMMENDATION 14

That the current school guidance counselor-student allocation be increased from the current 1:500 to 1:250 in order to reflect the expanded role and responsibilities of the guidance counselor in the school system.

Explanatory Note: The role of the guidance counselor has changed dramatically over the past decade. Guidance counselors are now required to complete assessments, conduct peer, group, individual and grief counseling sessions, as well as ensure that students are receiving some level of career counseling and planning.

Guidance counselors also play a significant role in ensuring that high school students are choosing the appropriate courses they need in order to graduate. As a result, guidance counselors assist directly in ensuring that high school graduation rates in the province are increasing, but they cannot be expected to implement new initiatives in addition to the many other responsibilities they currently have to perform without additional time and an increase in human resources.

NLTA's Recommendations on Government Initiatives

In the 2006-07 Program of Studies, the Department of Education recommended that a percentage of instructional time be allotted in various subject areas at the Primary (K-3), Elementary (4-6), and Intermediate (7-9) level. In addition, the Department recommended an instructional time allotment at the Senior High (Level I-III) based on a course credit structure and graduation requirements. These recommended percentages of instruction and time allocation are very important to the overall development of a child's holistic educational program. However, if we are going to adhere to these recommendations and address the needs of each individual child, it is critical that we ensure that an appropriate level of resources (both human and physical) is provided. No longer can we accept a reduction in the percentage of instruction that is allocated to Art, French, Music and Physical Education in order to increase instructional time in other areas. No longer can we accept the illusion that teachers are being allocated specifically for these areas, when in most cases they are included in the regular classroom teacher allocation and these subject areas are being taught by the regular classroom teacher, rather than a specialist teacher.

In addition to the recommendations outlined in the 2006-07 Program of Studies, during the budget announcements in March 2006, the Provincial Government also outlined its commitment to developing and/or improving certain specific areas and programs offered in the K to 12 system. Specifically, these were commitments to:

- Health and Physical Education initiatives;
- Fine Arts programming in schools;
- Developing information technology skills and integrating those technology skills into the prescribed curriculum;
- Providing skilled trades and technology programming at the high school level; and
- Improving Minority French Language Education.

Even though Government indicated in its announcement that sufficient resources would be provided to implement these initiatives, the realities of the system reveal specific problems and concerns which suggest that this is not the case. For example, if the health and physical education initiative is to be implemented successfully, major promotional programs and campaigns have to be developed and implemented at both the school, community, and provincial levels. Substantially more human and physical resources will be required to aid in promoting the overall goals and objectives of a healthy lifestyle and healthy eating habits. Partnerships must be developed between schools and Health and Community Services groups and organizations, and time must be scheduled during the school day for students and teachers to participate in such programs. Similar concerns of insufficient resources are applicable to the other commitments listed above.

In order to ensure that the above initiatives are effectively implemented, the NLTA makes the following recommendations:

RECOMMENDATION 15

That *all* schools, regardless of size or location, receive the following specialist allocations in addition to the administrative, regular teacher, special needs and guidance allocations referenced in other recommendations throughout this document:

Physical Education: allocation based on a teacher to student ratio of 1:250;

Fine Arts: allocation based on a teacher to student ratio of 1:250;

Information/Technology: allocation based on a teacher to student ratio of 1:250;

Skills Trade/Technology/Industrial Arts: allocation based on a teacher to student ratio of 1:250;

Music: allocation based on a teacher to student ratio of 1:250;

Core French: allocation based on class size and/or course maximums as recommended earlier in this report (see Recommendation 8); and

French Immersion: allocation based on class size and/or course maximums as recommended earlier in this report (see Recommendation 8).

RECOMMENDATION 16

That the Provincial Government lobby the Federal Government for additional funding to promote French Language programming and the French culture in *all* schools throughout the province.

RECOMMENDATION 17

That the implementation of the skills trade and technology program be expanded to include students in junior high school.

NLTA's Recommendations on Equity in Educational Opportunities

Equity in educational opportunity has evolved to be one of the most important concerns in society today. Human rights organizations and other advocacy groups have insisted that *all* children have a right to a quality education. Given the realities of our province, providing equity of educational opportunity presents unique challenges. However, we must all be willing to do what is needed to address these challenges. Through this Commission, the Government has committed to:

- providing appropriate levels of special education services, while supporting inclusive education;
- placing an expert teacher in every classroom, as well as working with recruitment, retention, assignment, teacher training and professional development;
- determining whether there is a need to facilitate a better transition from pre-Kindergarten to Kindergarten, (e.g., KinderStart);
- promoting bilingualism in the province;
- increasing the high school graduation rate;
- providing appropriate programming options for all students, including those in rural settings. This would include:
 - i. an examination of minimum resourcing needs;
 - ii. an examination of sole charge schools;
 - iii. an examination of the role of the small necessarily existent (SNE) designation;
 - iv. an examination of the role of bursaries in providing opportunities for students living in isolated areas;
 - v. an examination of teacher recruitment and retention issues (particularly the recruitment of specialist teachers) in rural areas.

During the past 10 years, the introduction of the Pathways and KinderStart programs has created major student, classroom, and teacher workload concerns. While the principles and goals of both the Pathways and KinderStart programs are philosophically sound and have been supported for the most part by the NLTA, the lack of appropriate levels of teacher resources, classroom supports, and time have made it impossible for the NLTA to support their implementation. (*Note:* The NLTA will be making a formal submission to the ISSP/Pathways Commission.)

In response to the many concerns surrounding “Government’s commitment to providing appropriate levels of special education services, while supporting inclusive education”, we believe that *all* children, regardless of age, ability or location, *must* be provided with an equal opportunity to avail of sound, educational programming. (Please refer to recommendations 8, 12, and 13). In addition, the Association makes the following recommendations:

RECOMMENDATION 18

That where a student is documented as Criteria C, the Department of Education provide, in addition to the regular teacher allocation, a full-time Criteria teacher to assist the child at each grade level in the primary, elementary, intermediate, and senior high school.

RECOMMENDATION 19

That where students are documented as Criteria D, E, F or G, the Department of Education provide, in addition to the regular teacher allocation, an additional allocation in a ratio of Criteria students to Criteria teacher of 4:1 for each of the school divisions of primary, elementary, intermediate, and senior high schools.

RECOMMENDATION 20

That a substitute teacher allocation or budget be provided to each school district, and in turn, to each school, to release teachers from their regular teaching duties to attend ISSP meetings during the instructional day.

E-Learning and Bursary Opportunities

It is unrealistic to believe that the same level of resources that would be allocated to a large school in an urban center would also be available to some of our more rural and isolated schools located around our province. However, that is not to say that the students living in these communities should not have the same opportunity to experience similar education programs as students living in urban cities or larger towns and communities. Providing this equity creates greater challenges and thus requires greater creativity in the rural regions of our province.

For many years now, students enrolled in some of our small rural and isolated schools have depended on the Centre for Distance Learning and Innovations (CDLI) and bursary programs to receive their educational programs. Each of these options have been very successful and we must continue to support them for the students they serve. The NLTA makes the following recommendations:

RECOMMENDATION 21

That the maximum class size for any course or program delivered by e-learning (e.g. distance education, web-based, etc.) be 20 students or less.

RECOMMENDATION 22

That the maximum number of students per CDLI course at any given site be six students or less.

RECOMMENDATION 23

That for schools who offer courses through CDLI, an additional one-half teacher unit be allocated to each school offering up to five CDLI courses.

RECOMMENDATION 24

That an additional one-quarter teacher unit be allocated to each school for each additional three CDLI courses.

Explanatory Note: These additional units are necessary to complete the administrative duties and other responsibilities associated with such courses.

RECOMMENDATION 25

That the bursaries currently paid to students who must leave their communities to continue their education continue to be provided and that these bursaries be increased annually to reflect increases in the cost of living.

Home-to-School Transition

The home-to-school transition for most children is a crucial first step to the educational development of the child. Unfortunately, throughout our province, not all communities have the necessary resources or supports available to make such a transition possible. To assist in this process, the Department of Education recently introduced the KinderStart program. Even though the goals and principles of this program are well grounded in early childhood educational research, the current process used to implement this program requires serious reconsideration. This program, as valuable as it is to the students that enroll, has created unreasonable and unmanageable workloads for Kindergarten teachers who are charged with the responsibility of implementation.

As with many other programs that the Department of Education has attempted to implement in recent years, “time” and adequate human resources to implement the goals and objectives of this program are critically deficient. In some primary schools today, for example, a full-time Kindergarten teacher can be responsible for two Kindergarten classes of 25 students (for a total of 50 students). With the implementation of KinderStart, this workload can automatically be expanded to include two additional groups of 25. It is an unreasonable and unrealistic expectation that one teacher implement both programs at the same time with 100, four- and five-year-olds. In addition to the classroom demands, parents of KinderStart and Kindergarten children have high expectations and demands of the teacher.

In addition to the current lack of resources to address the home-to-school transitional programs, there is also a major lack of resources available at the primary level to address the needs with respect to volume of primary assessments required. Primary teachers are overwhelmed with the amount of time that is needed to formally complete the reading records and the other battery of tests which are required to be completed for each reporting period at the school level and submitted to the Department of Education. These teachers have been literally “crying out for help” in order to get this work completed. The NLTA therefore makes the following recommendations:

RECOMMENDATION 26

That a substitute teacher allocation or budget be provided to release the Kindergarten teacher from his/her regular duties in order to prepare and deliver the KinderStart program.

RECOMMENDATION 27

That a substitute teacher allocation or budget be provided to release all primary teachers during each reporting period who are required to conduct reading records and other major assessments as part of their formal language assessment.

RECOMMENDATION 28

That the maximum class size for each group of KinderStart students be 12 students or less.

RECOMMENDATION 29

That *all* KinderStart students be included in the Annual General Return (AGR) for the school and included in the calculation of the administrative allowance of each school administrator.

Explanatory Note: Even though these students avail of an educational program that is delivered by teachers and administrators at the school, these students are not currently included in the AGR of the school or in the calculations of the applicable allowances payable to various positions in the school. There are significant additional administrative responsibilities associated with implementing the KinderStart program.

Improving Graduation Rates

Increasing the graduation rate is a laudable goal. The teacher allocation process could be a major contributor toward this goal. However, such an increase will not be realized if we do not acknowledge the fact that success begins much earlier in a student's career than at the high school level. The NLTA proposes that the recommendations made earlier in this report to increase teacher allocations based on both student needs and programming needs would contribute to the Government's achievement of its goal to increase the graduation rate. In addition, the NLTA makes the following recommendations:

RECOMMENDATION 30

That the graduation requirements be expanded to include skilled trades and technology credits and other practical programs.

Explanatory Note: We must accept the fact that not all students are university bound. Many will choose a future in the skilled trades or technology sectors after completing high school. Providing expanded options for credit towards graduation will improve the possibilities of retaining students who are currently "at risk" and increasing the overall graduation rate.

NLTA's Recommendations on Human Resources /Recruitment

For the past number of years, both the NLTA and school districts have expressed serious concerns relating to issues surrounding human resources/recruitment and the inability of school districts to attract qualified candidates, particularly to certain rural and isolated regions of the province or to some of the more specialized positions in district offices. School districts have expressed concerns regarding the problems of attracting teachers in certain disciplines. Districts have also experienced problems recruiting specialists to district positions such as Educational Psychology and Speech Language Pathology. These problems exist not only in rural areas of the province, but also in some of the larger rural centers and urban areas. Individuals with the qualifications and training in high school Mathematics, Chemistry, Physics, French, Educational Psychology or Speech Language Pathology have opted to work in the private and/or health care sectors where the remuneration levels and opportunities for advancement are greater. Many see these non-educational opportunities as being far more attractive because the individuals have far greater control over their workload, caseload, hours of work and travel obligations. Unfortunately for the school system, our students are missing out due to our inability to attract our brightest and most educated candidates to such positions.

In recent years, school districts have experienced a major decrease in the number of teachers expressing an interest in school administration, i.e., principal, vice principal, department head, and program specialist. With the downloading of work and the increase in the hours outside the regular workday required to complete the work associated with such positions, teachers are no longer attracted to them. Some who have accepted such positions in the past have elected to resign or have requested and accepted transfers back to classroom positions. Others have simply resigned and moved on to employment opportunities outside of education.

School districts have also experienced a steady decrease in the number of applicants applying for teaching positions in general. Unfortunately, teaching is becoming an unattractive career option for our young people. Educational organizations and other teacher affiliated groups across Canada have stated for several years that approximately one-third of all beginning teachers leave the profession within the first five years of accepting their first job. Furthermore, "nearly 30% of those responding to a CTF poll indicated they had been involved in a mid-career support program" as a means of coping with the stress and workload of their teaching position. (Canadian Teachers' Federation *Economic and Member Services Bulletin*, "Teacher Recruitment and Retention: Why Teachers Enter, Stay or Leave the Teaching Profession", October 2004)

With recruitment and retention issues becoming more problematic as time goes on, the Provincial Government needs to take a very serious and immediate look at correcting the problems associated with the classroom and the workloads of teachers. It is our position that Government should give serious consideration to introducing some form of employment incentives program that might help to attract and retain qualified candidates to such positions.

To address some of the recruitment and retention issues facing our education system, the NLTA makes the following recommendations:

RECOMMENDATION 31

That a new allowance structure be introduced for Educational Psychologists, Speech Language Pathologists and Itinerant Teachers for the Hearing and Visual Impaired.

RECOMMENDATION 32

That for positions to which an allowance is currently paid, e.g., administrative and guidance positions, Government increase the allowance to a level which would attract more interest in such positions.

RECOMMENDATION 33

That the caseload and workload of Educational Psychologists be reduced to a Canadian standard level.

RECOMMENDATION 34

That the caseload of Speech Language Pathologists be maintained at a 1:60 Speech Language Pathologist to student ratio, with a maximum of 40 direct-contact students per position.

RECOMMENDATION 35

That the allocation for teachers responsible for the Hearing and Visual Impaired students be on a teacher-pupil ratio of 1:20.

RECOMMENDATION 36

That in locations where school districts have difficulties recruiting and retaining qualified teachers and specialists, Government expand its recruitment and retention allowance program.

Explanatory Note: An expanded recruitment and retention program, if developed on an increasing scale per years of service structure, will help attract and retain qualified candidates to such positions. Similar scales are readily available in most northern communities across Canada and have proven to be successful in recruiting and retaining employees in rural and isolated areas.

Substitute Teacher Allocations

In addition to the above-mentioned concerns, another substantial human resource allocation pertains to the area of substitute teacher allocations and the overall substitute teacher budget. Even though the total substitute teacher budget has remained relatively constant over the last number of years, there has been a significant shift in the emphasis and criteria on which substitute teachers are provided at both the school and district level, i.e. there has been a major reduction in the granting of teacher discretionary leave requests.

Each year, fewer and fewer leaves are being granted to teachers for family leave, individual teacher professional development leaves, extra-curricular/school (student) related leaves, and other teacher discretionary leaves as outlined in the collective agreement. The denial of such leaves, as family leaves, on the basis that “there’s not enough to go around”, is very common. These denials have added tremendous stresses to individual teachers and staffs.

With the reduction in the availability of substitute days to cover such leaves, many school districts have downloaded their responsibility and have resorted to allocating substitute days to individual schools throughout their district based on a formula which reflects the number of teachers on each staff. As a result, the denial of such leaves is now being communicated to individual teachers at the school level by the administrator, rather than by the district office personnel. It is common today for teachers to be informed at the beginning of the school year of the total number of substitute days available for all discretionary leaves at the school. In many conversations, teachers are often told, “Don’t apply for your discretionary leave because I cannot grant it to you!! I don’t have enough days!!” This issue has become very serious and has added tremendous stresses on both the teacher and the education system in general.

To address the issue of substitute teacher allocations, the NLTA makes the following recommendation:

RECOMMENDATION 37

That Government substantially increase the substitute teacher budget to all school districts in an attempt to begin to address the many issues regarding the granting of teachers’ discretionary leave requests.

NLTA's Recommendations on Other Issues

Even though the objective of this Commission is to focus on the ways and means that teachers are allocated, there are other human resource issues which indirectly affect the teaching and learning environment.

STUDENT ASSISTANTS

Even though student assistants are not deployed under a teacher allocation formula, their direct assistance to students and their presence in the classroom have a significant impact on teaching and learning. Unfortunately, one of the most frustrating problems associated with the current allocation process is the overwhelming documentation that is required by the Department of Education for a child to receive student assistant support. It is not uncommon to see the process repeated year after year in an attempt to obtain the same level of student assistance support for the same student whose needs have not changed significantly from one year to the next. Often even with the re-documentation, the level of student assistant support is reduced. The reduction in student assistant support often places considerable demands on the categorical, non-categorical and/or regular classroom teachers. As with the other required resources and supports approved for a child with exceptionalities, the student assistant support should remain in place from one year to the next or until such time that it is determined by the ISSP team that such assistance is no longer necessary.

TECHNOLOGY SUPPORT PERSONNEL

Today's society is technologically driven and it is reasonable therefore for society to expect our school system to develop technologically skilled graduates. To meet this expectation, in recent years the school system has experienced an increase in the installation of computer and network technology. Unfortunately, as with most technologies, computers and networks are prone to failure and thus require servicing. For the most part, when such failures occur, there is an expectation that "someone on staff", often the computer/technology teacher, will "fix" the problem. These added responsibilities for which no additional time is provided, coupled with an already over-burdened teaching workload, cause undue stress and anxiety for the teacher and the school in general. Furthermore, one must question whether computer and network repair is an appropriate use of the professional teacher's time. It is critical for the Department of Education and the school districts throughout the province to hire a sufficient number of technical support staff to relieve the teachers of this duty.

SUPPORT STAFF PERSONNEL

In many schools today, it is not uncommon to find that at times no one is available in the office. In no other public building in our province would a visitor or client arrive and find an unattended reception area. Why should schools be any different? There are major security and liability issues inherent in these situations. Government must ensure *all* schools are staffed with an appropriate level of support, i.e., administrative assistants, custodial, and janitorial staff.

Although these areas are not directly associated with the teacher allocation process, inadequate provision of non-teaching staff has had a significant and direct impact on the teaching-learning environment. The support that these roles provide is critical to the education system and cannot be ignored if we are expected to move the system forward.

Conclusion

The NLTA strongly believes that there is a need to change the way teachers are allocated in our province. In over 600 submissions and in focus groups and consultations, individuals and groups have repeatedly expressed the concern that the current model, based on enrolment, is not meeting the needs of students, of the school, or of the education system in general.

We have reached a point which necessitates a new, responsive and responsible approach if indeed we are committed to improving teaching and learning – the essence of education. This new approach should begin with an assessment of the needs of each student and each school and result in the appropriate allocation of resources to ensure that these needs can and will be met.

Summary of NLTA Recommendations

RECOMMENDATION 1

That every school have a school administrator or an administrative team with sufficient time allocated during the school day for the persons employed in such positions to address the administrative needs, responsibilities and obligations associated with the operations of the school.

RECOMMENDATION 2

That the allocation of school administrators be completely separate from the allocation of other teaching units. This allocation should not be included in determining the pupil-teacher ratio, unless the administrator has teaching responsibilities.

Explanatory Note: Including full-time administrators and others in the system who provide much needed supports, such as Guidance Counselors, Non-Categorical Special Education Teachers, Learning Resource Teachers (LRTs), Program Specialists, Educational Psychologists, Speech Language Pathologists, and Itinerant Teachers for both the Hearing and Visual Impaired, skews the validity and accuracy of a true pupil-teacher ratio. The *2005-06 Education Statistics* reveals that the pupil-teacher ratio for the province was 13.4:1. As many as 20 to 25 percent of the current allocated units that are factored into the calculation of the pupil-teacher ratio are necessary support units in the system which do not have direct teaching responsibilities to classes or course groupings of students.

RECOMMENDATION 3

That the following criteria be included when determining the allocation of school administrative units: school configuration, total student enrolment, program offerings, community supports, and special needs students:

School configuration: K-3, K-6, K-9, K-12, 4-6, 4-9, and 9-12 schools *all* have different and unique needs.

Total student enrolment: *All* students who avail of educational services at the school should be included in determining the administrative allocation. Students who register for such programs as KinderStart, or foreign students who pay a tuition fee to enroll in programs in our school system, are currently not included in the Annual General Return (AGR) for the school. Obviously, the larger the school, the greater the need will be for an increased administrative allocation.

Program offerings: Administrative allocations *must* reflect the varying degrees of need that exist between schools with different program offerings. Schools that offer French Immersion programs, for example, should receive an additional administrative allocation since such programs add a new dimension of issues to the operations and administration of the school and to the maintenance of the program.

Community supports: In communities where there are very limited opportunities for students to participate in organized activities, there is an increased expectation and reliance on schools to meet this need.

Special needs students: The administrative allocation should reflect the added administrative responsibilities that are associated with developing, implementing and maintaining sufficient programs and resources to address the needs of students with recognized and/or documented exceptionalities.

RECOMMENDATION 4

That teachers occupying Department Head positions receive supports in the way of additional scheduled administrative time during the regular work day to complete their administrative responsibilities.

Explanatory Note: This recommendation is an extension of the recommendation made previously regarding school administrators (see Recommendation 1). No longer is it acceptable to expect Department Heads to perform the additional duties and responsibilities on their own time, after they have taught classes for a full day and the workday has ended. The additional time needed to perform their duties *must* be reflected in an overall increase in the teacher allocation in order to prevent a transferring of their responsibilities to other teachers on the staff.

RECOMMENDATION 5

That Department Head designations and allocations be expanded to include Student Support Services and Technology programs offered in schools.

Explanatory Note: Given the dramatic increase in the number of students who have been assessed and documented over the past five to seven years with having some kind of exceptionality requiring some level of support, a Department Head administrative position for Student Support Services should be formally established and sufficient human resources be allocated to ensure the coordination of resources and ensuring that the ISSP program requirements at the school level are implemented.

RECOMMENDATION 6

That a core of 15 program specialists be allocated to each school district, with one additional program specialist allocated for every 5,000 students enrolled in the district.

Explanatory Note: Program specialist allocations were substantially decreased during the most recent school district restructuring fiscal exercise. These cuts have proven to be critical, especially to the delivery of much needed professional development and in-service training of new curriculum to teachers.

RECOMMENDATION 7

That a teacher network manager/administrator be allocated to a school where a computer network system has been installed.

Explanatory Note: Many of our schools today have sophisticated computer network systems that require constant monitoring and modifications. These network requirements are often a daily necessity in order to ensure that the use of technology is incorporated across the many curriculums and throughout the various grade levels. Given that most of the work that is required to maintain the network has simply become an additional, voluntary expectation placed on the technology teacher or some other teacher on staff who has skills in technology, the workload has become unrealistic and unmanageable. The results are often frustrated teachers, frustrated students, frustrated colleagues, and a system that is not working.

RECOMMENDATION 8

Class Size/Class Composition

That a class size limit be fully implemented at *all* grade levels and in *all* classes/courses from Kindergarten to Level III inclusive, effective September 2007 using the following criteria:

Kindergarten to Level III

The maximum class size for Kindergarten be reduced to 12 students or less and the maximum class/course size for Grades 1 to Level III be established at 20 students or less.

Class Composition

The composition of each class, i.e., the needs of individual students, be a major factor on which class size is determined. Students with greater needs require additional time and instructional support, therefore the Association recommends the following criteria for determining class size:

- Students deemed as Pathways 2 students shall be counted as two pupils in determining maximum class size;
- Students deemed as Pathways 3 students shall be counted as three pupils in determining maximum class size; and
- Students deemed as Pathways 4 students shall be counted as four pupils in determining maximum class size.

Multi-age/Multi-course Groupings

Where it is necessary to combine two or more grades or courses in one class with one teacher, the maximum class size for such combined classes shall be as follows:

- Kindergarten to Grade 3 – 12 students or less;
- Grade 4 to Level III – 15 students or less.

Instructional Delivery by E-learning

The maximum class size for any course or program delivered by e-learning (e.g. distance education, web-based, etc.) should be 20 students or less. Also refer to recommendations 21, 22 and 23.

RECOMMENDATION 9

Preparation Time

That the allocation of teacher units to each school be adequate to ensure that *all* teachers, regardless of grade level or program taught, receive on average throughout the instructional cycle, a minimum of 60 minutes of preparation time during each instructional day.

Explanatory Note: Dr. David Dibbon's report, *It's About Time!! A Report on the Impact of Workload on Teachers and Students*, states: "Working to ensure adequate preparation time for teachers seems like a sensible strategy to combat unreasonable workloads – a strategy that would likely result in a reduction in teacher attrition and an increase in retention levels." (Pg. 16)

RECOMMENDATION 10

Minimum Allocation

That the minimum portion of any teaching unit allocated to a school be 50%.

Explanatory Note: It is very difficult to attract qualified candidates to fill positions that are advertised as less than 50%. It is also difficult to effectively schedule these units within the overall school schedule.

RECOMMENDATION 11

Learning Resources

That every school receive a separate allocation for a Learning Resources Teacher (LRT), based on the programming needs of the outcomes-based curriculum that is implemented in the school.

RECOMMENDATION 12

That the allocation of non-categorical teacher-student ratio be increased from the current 7:1000 to a minimum of 10:1000.

Explanatory Note: In order to address the concerns that have been identified in each school, as well as to provide remedial students (current Pathways 2) and students requiring modified programs (current Pathways 3) with the assistance they require and so deserve, this is a reasonable and necessary adjustment to the current formula. Currently, students who require remedial interventions and modifications to programming are not included in the non-categorical teacher allocations and this additional responsibility is passed on to the regular classroom teacher. Without this much needed assistance, certain students are unnecessarily at risk. If we are to increase the high school graduation rates in this province, the non-categorical teacher allocation must be increased to ensure that the at-risk students and those requiring remedial assistance and modifications receive the attention they require in order to be successful and to meet graduation requirements.

RECOMMENDATION 13

That every student who has an identified and/or documented exceptionality be granted resources and supports as determined by the school's Individual Services Support Plan (ISSP) team as early as possible in their schooling. In addition, these resources and supports *must* continue to be provided until such time as is deemed unnecessary by members of the child's ISSP team at the school level. (See also Recommendations 18, 19 and 20.)

RECOMMENDATION 14

That the current school guidance counselor-student allocation be increased from the current 1:500 to 1:250 in order to reflect the expanded role and responsibilities of the guidance counselor in the school system.

Explanatory Note: The role of the guidance counselor has changed dramatically over the past decade. Guidance counselors are now required to complete assessments, conduct peer, group, individual and grief counseling sessions, as well as ensure that students are receiving some level of career counseling and planning.

Guidance counselors also play a significant role in ensuring that high school students are choosing the appropriate courses they need in order to graduate. As a result, guidance counselors assist directly in ensuring that high school graduation rates in the province are increasing, but they cannot be expected to implement new initiatives in addition to the many other responsibilities they currently have to perform without additional time and an increase in human resources.

RECOMMENDATION 15

That *all* schools, regardless of size or location, receive the following specialist allocations in addition to the administrative, regular teacher, special needs and guidance allocations referenced in other recommendations throughout this document:

Physical Education: allocation based on a teacher to student ratio of 1:250;

Fine Arts: allocation based on a teacher to student ratio of 1:250;

Information/Technology: allocation based on a teacher to student ratio of 1:250;

Skills Trade/Technology/Industrial Arts: allocation based on a teacher to student ratio of 1:250;

Music: allocation based on a teacher to student ratio of 1:250;

Core French: allocation based on class size and/or course maximums as recommended earlier in this report (see Recommendation 8); and

French Immersion: allocation based on class size and/or course maximums as recommended earlier in this report (see Recommendation 8).

RECOMMENDATION 16

That the Provincial Government lobby the Federal Government for additional funding to promote French Language programming and the French culture in *all* schools throughout the province.

RECOMMENDATION 17

That the implementation of the skills trade and technology program be expanded to include students in junior high school.

RECOMMENDATION 18

That where a student is documented as Criteria C, the Department of Education provide, in addition to the regular teacher allocation, a full-time Criteria teacher to assist the child at each grade level in the primary, elementary, intermediate, and senior high school.

RECOMMENDATION 19

That where students are documented as Criteria D, E, F or G, the Department of Education provide, in addition to the regular teacher allocation, an additional allocation in a ratio of Criteria students to Criteria teacher of 4:1 for each of the school divisions of primary, elementary, intermediate, and senior high schools.

RECOMMENDATION 20

That a substitute teacher allocation or budget be provided to each school district, and in turn, to each school, to release teachers from their regular teaching duties to attend ISSP meetings during the instructional day.

RECOMMENDATION 21

That the maximum class size for any course or program delivered by e-learning (e.g. distance education, web-based, etc.) be 20 students or less.

RECOMMENDATION 22

That the maximum number of students per CDLI course at any given site be six students or less.

RECOMMENDATION 23

That for schools who offer courses through CDLI, an additional one-half teacher unit be allocated to each school offering up to five CDLI courses.

RECOMMENDATION 24

That an additional one-quarter teacher unit be allocated to each school for each additional three CDLI courses.

Explanatory Note: These additional units are necessary to complete the administrative duties and other responsibilities associated with such courses.

RECOMMENDATION 25

That the bursaries currently paid to students who must leave their communities to continue their education continue to be provided and that these bursaries be increased annually to reflect increases in the cost of living.

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That a substitute teacher allocation or budget be provided to release the Kindergarten teacher from his/her regular duties in order to prepare and deliver the KinderStart program.

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