

OECTA RESPONSE

POLICY/PROGRAM MEMORANDUM 164: Requirements for Remote Learning

August 25, 2020

ONTARIO ENGLISH
**Catholic
Teachers**
ASSOCIATION

The Ontario English Catholic Teachers' Association (OECTA) represents the 45,000 passionate and qualified teachers in Ontario's publicly funded English Catholic schools, from Kindergarten to Grade 12.

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Catholic teachers recognize the extraordinary circumstances created by the COVID-19 pandemic, and we want to do everything possible to help students and families navigate these difficult times. However, there are a number of well-founded problems and pitfalls with remote learning, and especially synchronous learning, which must be acknowledged and addressed before it can be utilized as part of effective teaching practice.

These issues have been identified by our Association through conversations with Ministry of Education officials, as well as our written submission to the government on school reopening.

For example:

- Not all students, families, or even teachers have sufficient or reliable access to the technology needed to facilitate live online learning.
- Many students and teachers have family situations, care obligations, or time constraints that prohibit them from being able to participate in synchronous learning at scheduled times.
- It can be difficult to protect both teachers' and students' privacy when using live video or audio.
- There is no way for teachers to prevent inappropriate situations or images from being overheard or projected.
- Sessions could be recorded and shared without appropriate permissions, which would violate teachers' and students' privacy rights.
- Although most platforms have enhanced security capabilities, stories abound of uninvited participants spying on or disrupting live video or audio sessions. Most teachers will not have received adequate in-servicing to ensure they and their students are protected at all times.
- Videoconferencing and webcasting apps and services often share data with third parties, such as Facebook, which are non-compliant with privacy legislation and school board policies. Personal information that is provided to access the platforms may be accessed by others and used for nefarious purposes.

Above all, we have urged the government to recognize and respect teachers' professional judgment with regard to decisions about when and how to communicate with students directly. Unfortunately, with PPM 164, the government has largely ignored this advice in favour of an unrealistic notion of a full day of live, online activities for any student learning remotely. The model is neither practical nor feasible, and PPM 164 provides very little helpful guidance for school boards or educators. The policy is not accompanied with adequate funding, sufficient time, or the flexibility necessary for implementation.

Our Association's position is that PPM 164 does not serve students and could ultimately result in families becoming further disengaged from the publicly funded education system.

Definitions

The bias in favour of synchronous learning is obvious from the beginning of PPM 164. Citing no evidence, the government claims that synchronous learning supports the well-being and achievement of students. Asynchronous learning is dismissed, and there is little flexibility allowed for adapted curriculum delivery models that could be more responsive to the extenuating circumstances that have arisen out of the COVID-19 pandemic.

Minimum Requirements for Engaging Students During Remote Learning

The requirements for remote learning reflect the same standards for a 300-minute instructional day as regular in-school classes, as set in the *Education Act*. However, it is unclear how those subjects that are particularly unsuited to remote learning – for example music, physical education, or tech subjects – are to be delivered. There is also a question of how every student is supposed to meet their minimum requirement if there will be small group components as well as time reserved for teachers to provide individual attention.

There is no mention of supports for students who may have gaps in learning due to the initial school closure period, and no flexibility or resources to address these gaps prior to engaging in the current grade-level curriculum. There is also no funding provided to enable school boards to redeploy or hire teachers to support students who are learning remotely.

Minimum Requirements for Synchronous Learning

With PPM 164, the minimum requirements for synchronous learning have increased significantly compared to the emergency distance learning program implemented in the spring. But there seems to be no understanding on the government's part that the problems with distance learning, or the challenges for families, have not changed.

The minimum daily synchronous learning requirement greatly exceeds the recommended screen time for children and youth. This is not good pedagogy, and it is impossible to see how it supports student well-being, as the government claims. It is a particular issue for Kindergarten, for which the curriculum is inquiry- and play-based.

The model also assumes that students have the technology, family support, and living situations that make a full day of synchronous learning possible. Many families do not have reliable broadband internet service, or computers or other devices that students can access all day. And particularly for younger students, parents or caregivers must be available and able to assist with the technology. This raises serious equity concerns, as families that are not able to provide appropriate conditions will be forced to send their children into school environments with which they are not comfortable, or their children will be disadvantaged compared to other students who are learning remotely.

Staffing and supports remain major outstanding issues. PPM 164 says that where possible, different educators should be assigned to facilitate both formats of instruction, but many school boards do not have the resources to hire or redeploy teachers for this purpose. Also, will special education support be provided beyond the primary teacher assigned to instruct these students? Does the time during which supports are being provided count as part of the total synchronous learning time for that student? These are fundamental questions that must be answered, but again the government is providing little guidance or funding to support the model they are forcing school boards to implement.

Process for Exemption from Synchronous Learning

PPM 164 outlines a process for students to be exempted from the minimum requirements for synchronous learning, which says that boards must provide forms for parents or older students. In the agreement on central terms recently negotiated between the Association, the Ontario Catholic School Trustees' Association, and the government, OECTA negotiated a

process to exempt students from the Ford government's mandatory e-learning plan. Importantly, the process can be initiated not only by parents or older students, but also by school administrators or teachers. As the professionals who work with students every day, teachers are uniquely qualified to determine whether a student is suited or equipped to succeed using any particular method or tool.

At the same time, PPM 164 says that students who are exempted will be provided with a daily timetable in accordance with the 300-minute instructional day. Will teachers be notified in advance of the school year as to which students have been granted exemptions? Creating specialized curriculum for each student in the exempt category, especially without guidance or support, will add significantly to the workload and pressure on teachers. The government should be providing resources and funding to support these activities, otherwise they are expecting the same teacher to maintain synchronous and asynchronous programs simultaneously.

Protocols for Delivering Remote Learning

As has been communicated to the government many times, there are significant issues with regard to privacy and professional autonomy that are created by the use of synchronous learning. While engaged parents are integral to student success, PPM 164 sets up a situation in which parents are invited to observe and assess the learning situation and the teachers' skills. Teachers are trained professionals who take pride in their work, but there is genuine concern that this level of surveillance and scrutiny could be counterproductive.

Teachers will of course continue working with families to support and provide opportunities for students with special education needs. However, PPM 164 lacks important specifics about how accommodations, modified expectations, and alternative programming can continue to be delivered.

A broader problem is that the government seems to believe students being unable to participate in a full day of live, synchronous learning will be rare. In reality, it is likely to be common. Many families will be choosing to keep their children home because the shortcomings of the government's school reopening plan, but these parents will often have other work and care responsibilities. There are also many situations in which devices are shared between parents and children, or adequate internet connectivity is not available. PPM 164 says teachers should make curriculum and assessment accommodations in these

instances on an individual basis, but this is likely to be an incredibly time-consuming and inefficient policy given the number of students who will be affected. Teachers should not be made to bear responsibility for the government's unwillingness to reopen schools as safely as possible or develop a realistic remote learning program.

Access to Remote Learning Devices

Obviously, access to devices and internet connectivity for students remain significant issues, especially in rural and remote areas of the province. It cannot be stressed enough how urgent it is for the government and school boards to address these problems.

However, there is also the issue of access to devices for teachers. For a variety of legitimate reasons, teachers are reluctant to use their own devices for work-related activities; however, PPM 164's suggestion that teachers be directed to work at central sites is also problematic. Forcing teachers to congregate unnecessarily increases the possibility of contracting and transmitting COVID-19, both among each other and in the broader community. At the same time, equipping these teachers with the proper personal protective equipment will cause an unnecessary drain on supplies. It is in everyone's best interests that wherever possible, teachers be provided with the option of using school board equipment to undertake remote learning activities from their own homes.

Standardized Suite of Synchronous Learning Platforms

Teachers spent considerable amounts of their own time and money learning different learning management platforms during the initial school closure. Teachers should continue to have a choice of platform from those already approved across boards/systems. It also must be recognized that it will take time to teach students how to engage with new online platforms.

Cybersecurity, Privacy, and Online Safety

PPM 164 says school boards must ensure that teachers follow school board established procedures related to online safety, privacy, and cyber security. But the government must recognize the limits of these policies in a world of sophisticated online misconduct. It simply is not possible to guarantee security or privacy of students, families, or teachers – what

level of responsibility is the government prepared to take for forcing education communities into these risky situations?

Ensuring cyber security is an unreasonably high expectation for teachers. As with behavioural issues on the part of participants, or inappropriate things that might be seen or overheard, the government and school boards must recognize the limits of teachers' control in a virtual learning environment. To this end, school boards should exercise a great degree of caution before submitting any complaints to the Ontario College of Teachers (OCT), and the government should ensure that the OCT is acting reasonably in its approach to oversight.

There is also little said about students' and parents' responsibilities. The government must ensure that school boards have updated cyber policies in place, and that they continue to apply their codes of conduct.

Technical Support

PPM 164 says school boards are to provide technical support. Where is the funding for these services? Will these services be provided during the work day, or off-hours? Will teachers get priority in accessing resources? Currently, the IT support provided by school boards is incapable of keeping pace with the demands of technology used in a traditional school setting. Extending this already inadequate support to a system of live synchronous learning is an unrealistic expectation. There is no practical way that such support could be provided in real-time, or address the numerous hardware, software, and connectivity problems that became evident during the period of emergency distance learning.

There also needs to be clearer direction regarding the responsibilities of teachers if they are experiencing technical difficulties that prevent them from engaging in synchronous learning on any given day.

Educator Training

Many teachers have already been engaged in self-directed, job-embedded professional learning on various learning management platforms – our Association cannot keep up with the demand for professional development opportunities – but many others will require urgent and significant training before they can be expected to effectively integrate synchronous learning tools into their teaching practice. It is difficult to see how this can take

place in advance of a school year that is only weeks away. It is highly unfortunate that PPM 164 is so overly focused on prescribing teachers' activities, with the professional needs of teachers, as well as their professional judgment, being a mere afterthought.

Setting Out Roles and Responsibilities

Teachers will be expected to carry out effective instruction and evaluation of students, and they will of course undertake these duties to the best of their abilities. However, a remote learning environment will move at a different pace than in a traditional classroom environment, so considerations should be made to curriculum and reporting expectations. Evaluation will also prove more difficult.

There is mention of teachers submitting lesson plans to principals. It should be made clear that, just as in the traditional school setting, this is not a consistent requirement, but should only be done on request.

With regard to monitoring, we would again raise caution about parental evaluation of teachers, and how this feedback will be used. Teachers want to help students and their families navigate these extraordinary circumstances, but this should not be an invitation for subjective evaluation of teachers from those who are not trained or responsible for doing so.

Summary

The implementation of PPM 164 will be a huge task for school boards and educators. There is a significant amount of in-service required to facilitate health and safety in schools before we can even begin to think about delivering curriculum in a synchronous learning environment. Meanwhile, the government is also insisting on the introduction of a new math curriculum for the elementary panel.

Even if school boards are able to overcome all the practical considerations around access to technology, etc., there is still the fundamental step of teachers becoming familiar with learning management platforms and effectively integrating these tools into their practice for instruction, assessment, and evaluation. The fact that the government seems so unaware of how essential, and time-consuming, this will be is cause for great concern about their overall understanding of a teacher's job or the day-to-day functioning of a classroom.

PPM 164 works from the premise that synchronous learning will engage every student in the learning process. Certainly, this is an important goal for everyone in the education community. But while synchronous learning may increase engagement for some students, it is no panacea. The government's expectations for time spent on synchronous learning are pure fantasy, especially for younger students. Furthermore, much attention still must be paid to differentiated instruction and individual guidance. Greater respect for students' and families' capacity and abilities, and teachers' professional judgment, would have made the policy much more realistic and effective.

The government likes to dismiss teachers' skepticism about synchronous learning. This is insulting, demeaning, and ultimately not in the best interests of students. Teachers understand the extraordinary circumstances we all find ourselves in, and the creative solutions that are required to make the most of a bad situation. But concerns about equity, privacy, security, and liability are real and legitimate. Our Association will continue doing everything possible to educate the government about the realities of teaching and learning, so we can make sure that no matter the situation, the response of our publicly funded education system will be as safe, inclusive, and productive as possible.