



*OFFICE OF THE CHAIR*

*Chair: Goronwy Price  
C.E.O./Director of Education: Anthony Stack*

August 7, 2020

Honorable Brian Warr  
Minister of Education and Early Childhood Development  
PO Box 8700  
St. John's, NL A1B 4J6

Dear Minister Warr,

On behalf of the Newfoundland and Labrador English School Board, please find the [linked](#) report for **September School Re-entry** as prepared by the District (District Report). This report reflects the direction and guidance provided through the [Newfoundland and Labrador K-12 Education Re-entry Plan](#) (Government Plan), released by your Department on July 6. The District Report provides detail and amplification for our province's public education plan. It is our intention to release this plan as a draft document to educational stakeholders as soon as practical and then publicly as a dynamic draft **no later than Thursday August 13, 2020**.

In recent months and weeks, Trustees and District staff have been engaged in discussions about moving forward in the current uncertainty. Conversations have focused on many aspects, but primarily on how we return to school in a safe manner that maximizes student programming opportunity. We have a responsibility to guide and help our students, families and staff navigate and manage concerns regarding coming back together for the September return to in-class instruction. The District has taken the opportunity to engage and consult with our school communities to a level never before experienced by our organization. The input of our elected trustees, educational partners, administrators, staff members, school councils and, most importantly, our students has been essential and integral to bringing this document together.

It is with respect, and informed by those consultations and an in-depth study session by the Board on July 29, 2020 that I, as Board Chair, highlight a number of remaining concerns that exist, despite the significant detail and granularity provided in the attached document.

#### **Interaction with Health & Community Services**

While the report is informed by participation in four meetings with the Office of the Chief Medical Officer of Health together with officials from your Department and representatives of the Francophone District, key questions requiring medical advice on such items as busing, distancing requirements, and masks for the K-12 school system remain unanswered. As well, the District has requested that your Department arrange a meeting with counterparts in Health and Community Service together with senior representation from the Regional Health

Authorities to work out the liaison structure required for regional and local information exchange and decision-making during the school year as the situation with COVID-19 evolves. It is hoped that this conferencing can occur as soon as possible, so that what emerges from the discussion can be reflected in the final report.

### **Physical Distancing/ Resourcing Levels**

Plans presented in this report reflect the direction under three different scenarios, as directed by the Government Plan. The focus within Scenario 1 is having all K-12 students back in the classroom with health and safety measures as approved by public health officials. Recognizing not only the direction provided in the Government Plan, but also the recommendations of the [Updated COVID-19: Guidance for School Reopening](#) from Toronto's Hospital for Sick Kids and partners in Ontario, it should be noted that in many of our schools, particularly in more urban and centralized areas, physical distancing will not be possible. It should therefore be recognized that **without additional human resources and infrastructure footprint, we are unable to achieve physical distancing recommendations of one metre or two metres**. The District understands that the medical advice in the area of public education has a level of comfort with the concept of cohorting in a school environment. The feedback we have been hearing from our communities indicates that families are uncomfortable with this approach and indicate a need for further measures.

### **Student Transportation**

As there is currently no direction to reduce capacity on buses transporting students for September, the District will do its utmost to continue to provide an acceptable level of transportation for our students within current resourcing level and current public health advice. This will mean restrictions to courtesy seating availability and less flexibility for individual plans of students and families, which may result in further concerns expressed from families. The District also notes, **should the public health advice change and move to reduce seating capacity on buses, in the absence of additional resources this will result in the District having to take further measures to limit ridership**. This could include such moves as a prioritization of younger student ridership or a reduction in bus eligibility. It should also be noted that the quick acquisition of additional school buses or qualified staff to operate further vehicles is anticipated to be a significant challenge. However, in the longer term, it is prudent to acquire additional student transportation assets.

### **Availability of Substitute Teachers**

The District has experienced a dearth in the availability of substitute teachers (subs) in recent years and has had to rely increasingly on retired teachers to fill the gap. This is particularly true in more isolated and rural parts of the province. It has, at times, also been a challenge to obtain the appropriately qualified subs in other locations. In addition, a decline has also been noted in graduates from the Faculty of Education at Memorial University over the last decade. **The District believes the realities of the COVID-19 pandemic will mean a greater demand for substitute teachers**. With respect, our organization believes one potential mitigation measure would be the extension of previously approved retired teachers to substitute. Another possible

measure could be the relaxing of some of the restrictions currently in place regarding the use of retired teachers. However, the District sees the most proactive mitigation measure to ensure an availability of substitute teachers to support the public education system would be to hire a significant number of subs on term contracts for the first few weeks of the school year to ensure schools have the flexibility to cover teacher absences.

### **Families Who Elect to Remain Home**

The District feels it is prepared to pivot and respond to the various potential situations that the 2020-21 school year may bring and will do our utmost to prepare our school communities for a September return. However, it should be noted that despite our best efforts to ensure parents of our confidence in being able to provide a safe and secure learning environment for students during a public health emergency, some families may still elect to keep their children at home. The District must highlight that beyond the current direction from the Provincial Government on [Homeschooling options and availability](#) to students with medical documentation of serious, long-term health conditions, **there is no contingency developed to provide learning opportunities to those students and families.** Current human resourcing levels will not be able to provide simultaneous instruction to students in person and through virtual means. This has also been highlighted by privacy experts as presenting significant concerns and challenges to individual personal privacy. From our consultations with various stakeholders, the District believes there is a level of expectation from families that online or virtual learning will be available in some capacity should they decide to not send their child to school or should their child have to remain home for reasons other than COVID-19.

### **Internet Connectivity**

The District is pleased the Provincial Government has invested \$20 million to support the purchase of devices and technology. This strategic purchase will address the needs of not only our students in Grades 7-12, but also those of provincial teaching staff. We recognize resources are also being provided to attempt to augment and improve internet connection in areas known for connectivity challenges (such as MiFi devices). As September begins, schools will continue to provide electronic devices (e.g., Chromebooks) and possibly mobile internet connection devices to students that do not have internet access in their homes.

The District has strategically made significant investments in recent years to improve and augment the connectivity services within the province's schools to the extent that in many areas, our facilities provide the most stable and secure connection. Understandably, the availability and reliability of internet service is outside the control of the District. Any enhancements in infrastructure and services rests with private industry, in concert with provincial and federal officials. As has been acknowledged, not all households are able to receive reliable broadband internet services. If Scenarios 2 or 3 are required, school properties may provide an option for families to access internet service and download necessary materials as needed. The District is also prepared to provide low data options, which could include pre-loading student devices to allow for access without internet connection. While not ideal, it is an available community resource that can be accessed to continue student education if necessary.

## **Provincial Assessments**

Your Department's position on maintaining public examinations for the 2020-21 school year is concerning. The disruption to the latter part of the 2019-20 school year in response to the pandemic emergency has resulted in gaps in student learning. While we have every confidence that our capable teachers will be able to differentiate instruction and assessment to mitigate these gaps, we believe that anxieties around high stakes testing/assessment at the conclusion of the semester (for the 7 semesterized schools) or academic year for graduating students will be exacerbated. Similarly, given the potential for higher than normal absenteeism and disruptions to in-class instruction, as well as how these potential interruptions may be regional, resulting in possibly significant differences from school to school, it would be unjust to insist on substantive summative evaluations. **The District would support an advanced decision to preemptively cancel public exams for the 2020-21 school year.** We trust in the professional judgement of our creative and committed educators to authentically assess student learning. We have no doubt in their ability and desire to allow students to effectively demonstrate their learning through their interactions throughout the year.

## **Professional Learning**

The Board applauds your decision to authorize an early start to the school year to allow for school staff to prepare for the safe and healthy return of students this September. Front loading the three days, does however impact on the normal professional development for new curriculum implementation and the critical school development process. The District is compelled to request Ministerial approval for additional close out days in order for this critical professional learning to occur.

## **Conclusion**

The District continues to be appreciative of the guidance and direction from your Department and the good working relationship we have with colleagues within your various divisions. Our Board Trustees and District staff share in the desire to have all students and staff returning to school under Scenario 1. There remain concerns regarding the inability to maintain physical distancing, but as a District, we understand the medical guidance regarding managing risk.

The longevity of Scenario 1 is predicated on a low prevalence of COVID-19 in our respective communities. This will be largely dependent on the continued cooperation, commitment, and compliance of the general public, as well as clear medical guidance to our schools and communities. If, collectively, we can provide adequate resources and guidance to students, staff and families, and continue to minimize the risks wherever possible as a province, conditions such as limiting attendance in Scenario 2 or the adopting a largely-virtual model in Scenario 3 can and should be avoided. The Board and District believe that developing contingencies for additional human and physical resources is a sound investment in supporting schools to manage the successful operation of school for in person, in-class learning, for as long as it is safe to do so.

The public education of Newfoundland and Labrador's approximately 64,000 K-12 students is a partnership that is difficult to execute without the participation, understanding and commitment of all players; the Provincial Government and associated Departments and Agencies, District staff, teaching staff and their associations, support staff and their unions, families and integral school community members and, our most important resource, our young learners.

The District continues to be focused on our students, first and foremost; on providing a safe, secure, socially-just environment in which they can learn, grow and reach their full potential. While focus for us all has been impacted by the global pandemic, Board Trustees and District staff remain committed to working with all partners in the best interests of the students of Newfoundland and Labrador in the 2020-21 school year and beyond.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Price', written in a cursive style.

Goronwy Price  
Chair