

June 24, 2021

Cliff Cullen
Minister of Education
Legislative Building
450 Broadway
Winnipeg, MB R3C 0V8

Dear Minister Cullen,

The Louis Riel School Division (LRSD) Board of Trustees and Senior Leadership Team (SLT) have found the nature of the recent governance transformation data collection requests problematic, and three months into the rollout of Bill 64 and its Four-Pillar Strategy, we have grave concerns related to the consultation process.

As we are constantly refining and improving our staffing and programming processes, requesting data from the 2019-2020 school year renders it irrelevant to our current situation. We understand the 2019-2020 school year data was requested in an attempt to receive information least impacted by the pandemic; however, with a first-hand understanding of the impact the pandemic has had on students, staffing and programming, we are currently planning for a post-pandemic recovery. This means that the 2021-2022 staffing data would be the most relevant.

In consultation with other Winnipeg school divisions, we are not alone in suggesting that these data requests are unreasonable during an already busy time of the year. We continue to busily work through the data requests; however, it will take time to get it right. In the interim, you already have access to our FRAME 2019-2020 audited statements and compensation disclosure report. The SLT also walked your Deputy Minister, Acting Deputy Minister and Assistant Deputy Minister through a similar data request when determining who to layoff on the management team in June 2020.

We are also aware of the correspondence with other divisions in which you granted an extension for these data requests. We would like to assume that LRSD will have a similar consideration granted to ensure for the proper time and process to be given to these requests.

We are also concerned about the request for data without any in-depth consultative dialogue. Although we appreciate that your team has set up a help desk and provided answers to frequently asked questions, this is not our understanding of a meaningful and collaborative consultation. Our understanding is that this data is going to be shared with the recently hired consulting firm Deloitte. Our experience with third-party organizations during yearly audits is to have the team of auditors working directly and collaboratively with us to understand the data they are analyzing. This does not seem to align with your proposed process. We would welcome a dialogue with consultants at Deloitte.

As was evident throughout the year with simple student absenteeism data requests related to the pandemic, we are concerned that Manitoba Education officials will struggle to interpret the

data provided and it will result in a back and forth throughout the summer. Without doing the work up front on how to best collaborate and understand the governance transformation data requested, we fear it will lead to avoidable confusion and redundancies.

With respect to this upfront clarity of purpose, we are also still awaiting the promised record of discussion and slide deck from the meeting on June 3 in which these data requests were first presented. It is frustrating that we only have our memories of the conversation to guide us into this very uncertain future. This leaves us perplexed. The LRSD Senior Leadership Team recalls a slide discussing a human resources strategy being implemented by September 2021 that will include transition planning, analysis of the impact on staffing in board offices, and also outlining recruitment for a CEO, CFO and Directors of Education. Again, we are only going from memory.

The lack of clarity resulting from a lack of meaningful consultation in instances like the one described above may be a contributing factor to what you have labeled as ‘misinformation.’

You recently launched a campaign against the ‘misinformation’ surrounding Bill 64 and its Four-Pillar Strategy. In a press conference you stated: “To make progress on improving education as a whole, Manitobans need to turn their attention to our BEST strategy.”

The LRSD Board of Trustees and SLT have done just that and compiled a list of questions regarding each of the four pillars based on consultations and dialogue with parents/guardians, staff, and students. As demonstrated through the governance transformation data requests, the government is currently focused on Pillar 1: Governance and Accountability for Results. We have included questions and comments specific to that pillar in this letter.

Subsequent letters will follow regarding the other three pillars.

The Better Education Starts Today strategy states, verbatim, that success in Pillar 1 will look like:

- **37 elected regional school boards unified into 15 regions (plus the DFSM) by July 1, 2022.**
 - What does “unify” mean in this context? Harmonizing the systems and creating a unified culture and community bringing together two divisions in 2002 to form the LRSD took over a decade. It seems extremely unlikely that Manitoba Education will be able to unify and harmonize six school divisions in Winnipeg and numerous others throughout the province by July 2022 or in five years as is being suggested. To be clear, in your literature both target dates are being proposed and this leads to confusion.
 - Why dismantle long-standing structures of local participatory democracy in the form of locally elected school boards and replace them with a rigidly hierarchical and highly centralized bureaucratic structure? The only local participatory structure left standing is the Commission scolaire franco-manitobaine and its 11 trustees as protected by the Canadian Charter of Rights and Freedoms.



- The rationale given for 15 regions is physical geography. Does this highly centralized model of governance consider the wide diversity of human geography throughout the province, but also specifically within Winnipeg?
 - What will be the impact of unifying Winnipeg's six school divisions into one region, representing over 100,000 students by July 2022?
 - How will we achieve this once in a generation transformation to a new governance structure and foundation in 12 short months while focused on navigating the pandemic and hopefully, eventually, focusing on the recovery?
 - These questions about the unified structure diverge from information published in the Brandon Sun on June 8: "Under the section titled "What is proposed in Bill 64?," MTS representatives said that this legislation aims to replace democratically elected school boards with a single provincial education authority, which would be accomplished by amalgamating Manitoba's existing 37 school divisions in 15 regional catchment areas. However, the province insists that MTS' use of the word "amalgamation" in this context does not correlate to how "amalgamation" is defined within the current Public Schools Act, which involves combining two or more school divisions together. "We are not using that process in Bill 64," a Manitoba Education representative wrote. "Rather, the ... school divisions are being continued under a single board that will administer education within 15 regions." However, the Manitoba Education representative would go on to confirm that all school trustee positions will be eliminated under Bill 64, with each new region being governed by a director of education and a school community council at every institution." The question then is how will LRSD continue to endure in a relationship with the director of education for the Winnipeg region and the CEO of the Provincial Education Authority (PEA)? How will LRSD's remaining Board Office staff's relationship to the Director of Education and CEO of the PEA compare to its existing relationship to nine locally elected school trustees? How will this centralized bureaucratic accountability better serve students and families in LRSD in contrast to the current accountability to a local democratically elected school board?
 - When asked about the rationale behind 15 regions, more specifically, the size of the Winnipeg region, during a Town Hall on June 23, you said there is an "Opportunity to have a look at that and see if there's a chance to revise that." Do you intend to build on [the education 'modernization' in 2002](#), a reform initiative that was inspired by the [Norrie Report from 1994](#)?
 - How will you guarantee that the approaches to public education and LRSD's culture developed and nurtured over 19 years are protected after July 2022? For example, [LRSD's French Immersion policy](#) and French Immersion learning outcomes are unlike any other in the province and in the country. How will this policy and our unique approach to French Immersion be protected after July 2022?
- **Resources shifted to classrooms by reducing administrative costs to be in line with other provinces.**



- What evidence supports this claim that we are not in line with other provinces? After several years of austerity in government funding specifically focused on divisional administrative costs, [we have evidence to suggest the contrary.](#)
- The government says that, “Simplifying governance and administration will save at least \$40 million.” How? The public-school system is a people business. How many Board Office staff will you layoff?
- Where, specifically, will the government find a minimum of \$40 million in savings? *We understand that the most recent data request is intended to help a consultant provide you with an answer; however, the fact that you have a figure in mind suggests that you are already looking at some form of data that allows you to say with confidence it will be at least \$40 million in savings.*
- Is this a one-time savings or an annual savings?
- How will this \$40 million investment contrast with annual funding?
- Will the annual provincial government funding continue to fall behind the cost-of-living increase and enrolment increases for LRSD schools?
- **School Community Councils established for all schools by 2023.**
 - Why propose a one-size-fits-all approach to parent engagement in schools?
 - Why the need for parent engagement officers to enforce the new one-size-fits-all structure?
 - How much will the parent engagement officers cost every year? What are the qualifications for the job? Will these new officers come at the expense of other staff already serving students and families to nurture their engagement, i.e. social workers, psychologist, occupational therapists?
 - Is there a jurisdiction where this model has been successfully implemented in a way that has proven to be sustainable? Is this model supported in any peer-reviewed research? If so, where and what evidence was used to declare the model a success?
- **School-level assessment data available to all local school communities to identify areas for improvement and to inform decision making locally and provincially.**
 - What is the timeline for the development, implementation, data collection and analysis of these assessments?
 - Who is developing the assessments?
 - Who is analyzing the data?
 - What data is being analyzed?
 - How is the data being analyzed?
 - Who is making the data available to schools?
 - How is it being made available?
 - How will you remove barriers for marginalized communities to make data accessible in an open and compassionate manner?
 - What is the data policy and approach that guides data being used to inform decision making in a school, in a region and by the provincial authority?

- **Resources distributed more equitably across regions and schools by moving the funding model away from reliance on education property taxes starting in 2023.**
 - How will “equity” be defined? What are the criteria?
 - Are we redistributing funding to allocate more human and material resources where student demographics and needs indicate greater supports are required?
 - Provincial funding already mitigates for the inequity of property taxes contributing to the revenue that supports public education. It is the main reason the funding formula is so complex. Where will the government find \$800 million (and growing) annually to replace the property taxation revenue?

- **Implement a new provincial governance model that is coordinated, accountable and engages parents at the school level and in the design and oversight of the overall education system.**
 - What is the evidence to suggest that the existing governance model isn’t coordinated, accountable and engages parents at the school level and in the design and oversight of the overall education system? LRSD has evidence to the contrary:
 - LRSD is a newly amalgamated school division. We have only been in existence for 19 years, why not build on the culture we’ve worked so hard to develop and nurture to serve 40 schools in St. Boniface and St. Vital?
 - LRSD’s [Vision and Mission](#) statements
 - LRSD’s [organizational chart](#) that puts students at the center
 - LRSD’s [policies, protocols, and practices](#)
 - LRSD’s [Multi-Year Strategic Plan](#)
 - LRSD’s [Data Literacy Initiative](#)
 - LRSD’s [commitments](#) to Indigenous education and the Indigenous community
 - LRSD’s [investments and partnerships](#) to address societal and educational inequities
 - LRSD’s [response](#) to the growth in its French Immersion program designed to meet the geographic, historic, and cultural needs of St. Vital and St. Boniface

Please note that these questions and highlights of who we are in LRSD do not constitute an exhaustive list.

Without a genuine, two-way dialogue or consultation, questions and doubt will continue to build, and we will continue to be perplexed by where this is all going and how quickly the current system will be dismantled to then be rebuilt.

Based on the reasons and unanswered questions above, we are echoing what we’ve heard from families, staff and community members in LRSD, across the city, and throughout the province: Please consider pausing the rollout of Bill 64 and its Four-Pillar Strategy until we’ve had the chance to recover

from the pandemic and until we've been granted a genuine dialogue and consultation regarding the questions in this letter and countless others. As you and your team are new to public education, this would also allow you the time and space to better understand the foundation of the system you are looking to dismantle by July 2022 and rebuild within five years.

The uncertainty caused by Bill 64 and its Four-Pillar Strategy has already caused disruption in our community of 40 schools, 15,600 students, and 2,100 staff. Not only is the board office team two FTE smaller since the spring of 2020 because of the government's ongoing mandate to realize administrative reductions, but employee retention and recruitment have also become a struggle due to the turmoil caused by the announcement of Bill 64. People in the board office are openly fearful about their future and that fear is exacerbated by your recent governance transformation HR data request.

The rollout strategy over the past three months has felt like an attack on public education, especially when you are quoted as saying: "Manitoba's current education system is not working for students." This really is a misunderstanding of what the PISA and PCAP results are telling us about Manitoba's results on narrowly defined international and national norming studies despite a significant obstacle facing schools in Manitoba that isn't present to the same degree in other Countries and Canadian provinces: the highest rate of child poverty in Canada; a child poverty that is racialized. We will have more to share on this topic in future letters about the remaining three pillars.

As we have expressed to government on several occasions over the course of our brief 19-year existence, we are always eager for conversations that nurture a productive partnership to ensure continued student success in schools throughout LRSD. We believe the current priority of the Manitoba government should be on healing and recovery as we move into a post-pandemic future. The spectre of Bill 64 and its Four-Pillar Strategy looming over that recovery makes it ever more difficult for students, staff and families.

Moving forward with the current process of dismantling the public education system in the midst of a pandemic and the need to focus on the recovery will only contribute to do exactly what you have accused others of doing: "instil fear and anxiety in parents and educators" in LRSD.

We welcome an open dialogue with you regarding Bill 64 and its Four-Pillar Strategy to ensure our mutual goals of achieving better learning and well-becoming outcomes are reached in a compassionate, consultative, inclusive, equitable and evidence-informed manner.

Thank you for your time and consideration,

Louise Johnston
Chair, LRSD Board of Trustees

Christian Michalik
Superintendent & CEO

Cc: Dana Rudy, Deputy Minister
Sarah Whiteford, Assistant Deputy Minister
Christina Moody, Assistant Deputy Minister
Colleen Kachulak, Assistant Deputy Minister
LRSD Board of Trustees