



ONTARIO PUBLIC  
SCHOOL BOARDS'  
ASSOCIATION

Leading Education's Advocates

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Hello Jeanette,

Please find attached our response to the Ministry's letter seeking input on proposed province-wide guidelines relating to fundraising.

Our response was developed by members of our Policy Development Work Group who have met on several occasions to discuss the consultation questions in detail. This group is comprised of trustees from a wide variety of school boards and regions from across the province. Additionally, the issue was reviewed by our Executive Council and was also discussed at recent regional meetings held in October across the province.

OPSBA members support the concept of guidelines that boards can consider when developing or modifying their current policies. However, we believe that school boards must be able to create their own board policies that take into consideration regional demographics, community composition and differing socio-economic conditions.

Since the consultation period for this guideline was extended by two months, does this mean that the release of the final guideline will also be postponed?

OPSBA appreciates the opportunity to provide our comments and suggestions into these proposed guidelines and we would be pleased to discuss our comments further with the Ministry.

Sincerely,

Gail Anderson  
Executive Director

**November 1, 2011**

**ONTARIO PUBLIC SCHOOL BOARDS' ASSOCIATION (OPSBA)**

**RESPONSE TO**

**THE MINISTRY OF EDUCATION'S CONSULTATION DOCUMENT RE:  
DRAFT FUNDRAISING GUIDELINES**

**Introduction:**

Fundraising and fundraising activities in publicly funded schools continues to be a topic that stirs discussion about public education funding and what it should cover among the education sector and its stakeholders.

We know that a great many parents and communities want to and are actively supporting their local schools through financial means. However, we note that the amount of extra monies that are being raised for school purposes is steadily increasing; the trend is undeniable. We are also aware of the disparities between the ability of schools to fundraise and the amounts of dollars raised through fundraising. Schools with lower-income families tend not to raise the same amounts as those schools in more affluent neighbourhoods where parents have more time and/or money to fundraise and pay for enhanced learning materials and support extracurricular activities. At the same time we recognize that some boards compensate for this disparity by allocating relatively more money to less affluent schools and that these less affluent schools are sometimes eligible for bigger school budgets and /or more staff and possibly Ministry funding as well ( e.g., Learning Opportunities Grant, Model Schools for Inner Cities). Other supports are also sometimes available through partnerships with charitable foundations that fund specific school initiatives.

Fundraising has also generated recent media coverage where the focus was on the amount of money raised at certain schools; much of this coverage did not go into details about the purposes for which the money was being raised, e.g., a charity fundraiser (Terry Fox Run), or to which activities it was directed. This was also addressed in the September 12<sup>th</sup> report by Social Planning Toronto entitled, *Public System, Private Money: Fees, Fundraising and Equity in the Toronto District School Board*.

Furthermore, it has been reported that fundraising is now the main activity by school councils whose purpose, under regulation, is to “improve pupil achievement and to enhance the accountability of the education system to parents.” We want to emphasize our position that any extra funds raised or donated need to be used for “value-added” purposes and not to subsidize delivery of curriculum resources or provision of school safety measures which are core requirements within provincial education funding.

Our Association first commented on this issue in January 2010 when the Ministry of Education was seeking input on proposed province-wide guidelines for board policies relating to fundraising, corporate partnerships and student fees.

At that time, we indicated that many boards had well established practices and policies that addressed fundraising, but were supportive of guidelines that could be considered by boards when developing or modifying their current policies. We believe that school boards must be able to create their own board policies that take into consideration regional demographics, community composition and differing socio-economic conditions. We continue to maintain that this is yet another policy area where “one size fits all” approach is not in the best interests of students.

This response is based on the specific draft fundraising guideline that the Ministry has issued for consultation. These comments were provided by OPSBA’s Policy Development Work Team and members of our Executive Council, groups that comprise province-wide representation. Additionally, the issue was discussed at recent regional meetings held in October across the province. At these meetings, trustees commented that any guideline needs to be careful that it does not discourage parent’s involvement in our schools. They disagreed with some media recommendations to set limits for fundraising at individual schools. There is a range of views around the value of mechanisms to facilitate sharing of proceeds.

Our members are unanimous in the view that each and every student should have a full school experience and there should be a more concerted effort made to increase opportunities for marginalized schools and their students.

We have also attached Appendix B which includes the fundraising-related excerpts from our earlier submission.

### **Comments Specific to Draft Fundraising Guideline:**

A major concern with the consultation document is the confusion caused by references to both schools and school boards. For example, in the second paragraph, the document states, “*When schools and school boards choose to engage in fundraising activities...*” School boards would have board-wide policies regarding fundraising that an individual school would have to comply with. These two references are seen throughout the document but not always in a consistent manner. We request clarity on this issue and suggest that the final guideline focus on school fundraising activities.

For the remaining components of the draft guideline, we have listed the page and the item that we are referencing.

Page 1, Third Paragraph:

- Funds raised for school purposes should not be used to support:
  - *Learning materials and textbooks*. Is this referring to “core” materials and not those that have been identified as enhancements as addressed in the recent guideline regarding Fees for Learning Materials and Activities? We suggest adding a definition for this.

- *Capital projects that increase operating costs.* This is difficult to address when it is later stated on page 5, that schools should consider the costs of future maintenance and repairs.
- There is a second “not” included in the statement, “should not be not used...”
- We suggest that this list also include “not to replace full-time staff or any other school board employee (i.e. pay for substitute teachers).” Although this is alluded to on page 4 under “Examples of Unacceptable Uses of Fundraising Proceeds”, we request that this be stated up front.

#### Page 2

- Definitions – School-generated funds. We recommend that there be defined categories that show the differences between dollars raised by students for special trips and charitable causes (i.e. money in/money out) versus the dollars raised for school improvements and upgrades. These categories would also have to be reflected on the reporting templates.
- Definitions – Fundraising. This definition states that fundraising activities are “approved” by the school principal. It would be more reflective of the regulation regarding school councils and of current practice to say, “Fundraising activities are approved by the principal in consultation with and upon the advice of the School Council.” Please see Appendix A for an excerpt from the regulation regarding school councils and fundraising activities.
- Bottom page notation number 3 – It would be helpful to provide a clarification of why there would be an exemption for funds raised by the Ontario Federation of Home and School Associations (OFHSA).

#### Page 3

- In addition to the four Guiding Principles, we suggest adding a statement about equity that is similar to the suggestion made in our first submission, i.e., “activities should be equitable and support all students.”
- Guiding Principle entitled “Voluntary” states that “*parental consent is required for student participation for students under the age of 18.*” While we understand the need for this in relation to events taking place outside the school, we suggest the overall statement be reviewed to take into consideration the on-site fundraising activities that take place in schools. (i.e. dress down days)
- Guiding Principle entitled “Accountable & Transparent” has a first bullet that states “*Fundraising activities should be developed and organized with advice and assistance...*” It lists a number of groups that differs from the groups referred to on page 1 where seeking advice for fundraising activities is also referenced. This second list includes the parent involvement committee (PIC) which is a board committee, not a group that would be involved in the activities of an individual school at the local level. We suggest that this group be deleted in this context. Activities should support and be in accordance with board policies.
- Guiding Principle entitled “Accountable & Transparent”. We suggest adding to the list of persons who are not to benefit materially or financially to include anyone in the local community.

Page 4

- Under Examples of Unacceptable Uses of Fundraising Proceeds, we would recommend adding “the replacement of full-time staff or any other school board employee (i.e. pay for substitute teachers).”
- Under Examples of Acceptable Uses of Fundraising Proceeds, we would recommend that these be divided into the categories as suggested on page 2.

Page 5

- The Best Practices section should also include why and how fundraising activities can benefit schools and their communities (student engagement, increased awareness, stronger partnerships, etc.)

Page 5/6

- Accountability and Financial Reporting – We are supportive of any “simple to administer” mechanism that allows for greater transparency in the collection, reporting and accountability of fundraising. Boards have a standard template to collect information on an annual basis for inclusion in the board’s financial statements. We would suggest including the suggested categories for consistent and clearer reporting.
- Posting of the school generated funds on school web sites may be new for some schools but should not be difficult to do.
- Communication is key and we would suggest that each school use the communications vehicles that work best for them and their local school community.

Other comments offered by our Members include:

- Recognition that most boards work with an arms-length charitable organization that also participates in fundraising activities that support the entire school board.
- Recognition that some boards do not have this official arrangement but receive board-wide donations that are to target student achievement initiatives (i.e. scholarships)
- Recognition that there are some private sector organizations that specifically donate funds or equipment and programs to needier schools (e.g. Smart boards, skates, drama classes)
- Request the Ministry of Education to clarify how donations for scholarships are addressed for accounting purposes.
- Trustees expressed continued concerns that fundraising activities support needs that are inadequately funded within the GSNs.
- Acknowledgement of third party presences in our schools that indirectly provide fundraising dollars (vending machines, cafeterias, groups that hold fundraising activities on school premises such as a Christmas booth)
- Issue that some vending commission rates are decreasing significantly and therefore generating smaller fundraising amounts. This is an issue that OPSBA will monitor with the implementation of PPM 150.

**Appendix A – Excerpt from Ontario Regulation 612/00 School Councils and Parent Involvement Committees**

Fundraising

22. (1) Subject to subsection (2), a school council may engage in fundraising activities. O. Reg. 612/00, s. 22 (1).

(2) A school council shall not engage in fundraising activities unless,

(a) the activities are conducted in accordance with any applicable policies established by the board; and  
(b) the activities are to raise funds for a purpose approved by the board or authorized by any applicable policies established by the board. O. Reg. 612/00, s. 22 (2).

(3) A school council shall ensure that the funds raised by it are used in accordance with any applicable policies established by the board. O. Reg. 612/00, s. 22 (3).

**Appendix B – Fundraising-related comments from previous OPSBA submission (January 2010)**

**Fundraising**

***How should the school community be informed of fundraising activities?***

Communication vehicles could include:

- School newsletters (hard copy or email)
- Individual school and board web sites
- School announcements (i.e. morning announcements)
- School assemblies
- Parent Council meetings
- Student Council meetings
- School bulletin boards
- Local trustee communications
- Promotional ads/articles in local community newspapers

OPSBA members also suggest that there be many different forms of communication used to reach the community. Consideration should be given to possible translation needs so as to reach the entire community. Communications should also include specifics as to where readers could obtain more detailed information (i.e. web site) and fundraising contacts.

***How do capital fundraising projects complement or enhance existing funding? Should restrictions be placed on major capital donations?***

Our members agree that these types of projects can complement and enhance a student's school experience. There's little doubt of the benefits that students experience as a result of a new gymnasium, creative playground structures, or library. However, we are concerned about the amount of extra monies raised either by parents or via major capital donations and the message it sends about the adequacy of provincial government support for public education.

Schools and boards should give consideration to the size and frequency of major capital donations. Schools must also consider whether the capital donation is perceived as implied endorsement of a particular company and/or product.

Numerous groups would have to be involved in the consultation and decision-making process; these would include students, staff, parents and the board. Details about the donation should be widely

communicated.

***How can school fundraising activities benefit school and/or communities?***

Benefits include:

- Stronger community and school partnerships
- Increased student engagement in school and extracurricular activities
- Exposure to new environments and technology
- Increased awareness of local community support
- Increased school spirit and pride (i.e. ownership of state-of-the-art IT resources)
- Increased community use of schools
- Opportunities to build on character development and sense of civic duty (e.g., supporting international aid relief initiatives)

It is important to note that some boards have policies concerning fundraising that are distinct from policies concerning advertising. Corporate advertising could apply to yearbook ads, special events, athletic uniforms, as well as capital projects. Local boards and schools want to make their own decisions about such matters as the use of external company logos on T-shirts, location of posters etc.

**Accountability**

***Is the school community consistently made aware of what they are paying for, how much they are paying, why they are being asked to pay, and how the funds are spent?***

A general answer is difficult to provide as there are thousands of school communities in our membership.

Many schools and boards effectively convey their fundraising activities through a variety of communications. The school community is informed at the beginning of the school year about fundraising plans throughout the year and what the monies raised will support.

We do agree that more regular communications would be helpful for everyone and we support the need for greater overall accountability and transparency.

Some students and parents (and trustees!) continue to struggle with why any additional fees are required in a publicly funded education system. There is a notable level of frustration arising from the continual request for additional funds.

Other Comments:

- Need to consider and remember that many other associations and organizations fundraise (i.e. sports teams, dance classes etc.)
- The ministry needs to provide sustainable funding
- Fundraising should support healthy habits and support Ministry healthy eating / lifestyle guidelines (no alcohol, tobacco etc.)
- Acknowledge that some schools have acquired stronger expertise in applying for grants and donations than others. This can create an unfair advantage.