

# Principal Associations' Joint Submission

## Bill 101



L'Association des directions et des directions adjointes  
des écoles franco-ontariennes (ADFO)

Catholic Principals' Council of Ontario (CPCO) and  
Ontario Principals' Council (OPC)

To: MPP Brian Riddell, Standing Committee on Social Policy Chair  
April, 27 2026

## Public Consultation Submission

### **Bill 101, Putting Student Achievement First Act, 2026**

April 26, 2026

MPP Brian Riddell

Chair, Standing Committee on Social Policy

Whitney Block, Room 1405

Toronto, ON M7A 1A2

Dear MPP Riddell,

L'Association des directions et des directions adjointes des écoles franco-ontariennes (ADFO), the Catholic Principals' Council of Ontario (CPCO) and the Ontario Principals' Council (OPC) are pleased to present this joint submission in response to the Standing Committee on Social Policy's call for consultations with respect to *Bill 101, Putting Student Achievement First Act, 2026*.

Thank you for the opportunity to participate in this important consultation. Principals and vice-principals are valuable front-line leaders who interact daily with students, staff and the community and hold a vital role in the success of the public education system. In today's

evolving educational landscape, it's imperative for principals and vice-principals to navigate key areas that directly impact student success and well-being.

We support the government's proposed change with respect to reducing teachers' college programs duration while simultaneously increasing mandatory practicum hours. This will address teacher shortages, boost classroom experience and improve teacher recruitment.

In addition, we have outlined below points of concerns and recommendations for your consideration regarding key aspects of the proposed Bill.

## French Language Education

The removal of specialized structures supporting minority-language education, combined with increased centralization of authority and the creation of asymmetrical bargaining models between English and French-language school boards, raises important concerns regarding the protection of Section 23 Charter obligations. Modernization must not result in structural uniformity that weakens the distinct governance conditions required to sustain student success in French-language minority communities.

Bill 101 primarily focuses on English public and Catholic school boards, but also modifies the process for French-language rights holders to develop proposals and shifts roles from the Languages of Instruction Commission to the Minister.

- Increased centralization of authority at the ministry level may reduce responsiveness to the demographic, cultural and territorial realities that shape student success in French-language minority communities.
- The introduction of different employer governance models in labour relations may undermine staffing stability and labour relations in French-language schools, which already operate in a constrained recruitment environment.
- Maintaining trustee-led bargaining in French-language boards while transferring bargaining authority to administrative leadership in English boards creates a dual employer model that adds avoidable complexity, may affect labour stability and leadership planning in French-language systems, and risks future pressure toward structural harmonization that is inconsistent with minority-language education rights.

- Governance reforms designed primarily for majority-language systems should not be extended to French-language boards without explicit recognition of their distinct constitutional mandate.

ADFO recommends that Bill 101 be amended to

- Establish a permanent advisory structure specific to French-language education governance to replace the functions previously supported by the Languages of Instruction Commission.
- Explicitly recognize in regulation that governance differences between English- and French-language school boards reflect Section 23 Charter obligations and are necessary to ensure equitable outcomes.
- Recognize that governance modernization initiatives must strengthen, not weaken, the institutional capacity of French-language education systems to support student success in minority contexts.
- Commit to monitoring the long-term impacts of dual employer bargaining structures and confirm that no structural harmonization affecting French-language boards will proceed without sector consultation.

## **Strengthening Governance and Accountability**

The associations support efforts to strengthen student achievement and accountability across Ontario's education system. However, reforms proposed under Bill 101 introduce significant governance changes that may have unintended consequences for many students, particularly those in French-language education in minority settings.

Creating uniformity across the province will result in a cookie-cutter approach to education that limits the ability to respond to the specific needs of communities and students.

Ultimately, those likely to be most impacted by many of the provisions in this Bill are traditionally underserved as well as special education students.

Overall, while this Bill attempts to change a struggling and under resourced education system, it does so in a superficial manner that will result in further disconnects between decision-makers and educators doing the work in schools.

### **School Boards**

The Bill, as written, will create a system driven by financial outcomes with reduced focus on what is best for students. We are already seeing cuts to programming, supports and layoffs. Boards are making decisions to avoid government intervention even though that may not be in the best interests of students or families. These reduced supports can lead to increases in workload, teacher and principal stress leaves and reduced student success to programming that addresses their needs which is the goal of our entire education system. The additional oversight proposed by the Bill is likely to result in more restrictions on the part of boards to find local, creative solutions to address issues related to student achievement and a thriving publicly funded education system.

Centralized oversight of school board communications may limit the boards' ability to advocate effectively for their local context. This is of particular concern for access to education in French, which remains a core condition of community vitality across Ontario. School boards should have the freedom to provide frequent, timely and transparent communications about matters that impact students and the communities where they live and learn. Without the ability to determine and shape their own communications, school board staff, including principals and vice-principals, may not be able to be responsive to specific questions and issues which will increase frustration among students, parents, caregivers and community partners. Rather than limiting school boards' authority to shape their communications, we should focus on providing supports for school-based staff, particularly principals and vice-principals. They must contend on an almost daily basis with individuals who are increasingly frustrated and demonstrate aggressive behaviour toward those working in schools, affecting staff well-being and the safety of school environments.

We recommend that Bill 101 be amended to

- Protect local communications authority: Limit centralized oversight of board communications by clearly affirming school boards' authority to provide frequent, timely and transparent communications to respond to local issues, including matters affecting access to French-language and denominational rights in education.
- Shift from punitive oversight to resourcing and staff safety supports: Where enhanced accountability is contemplated, pair it with funding and operational supports that enable boards to maintain student-facing programming and to better protect and support principals and vice-principals managing increased conflict and aggressive behaviour from members of the public.

## **Capital Delivery Projects and Land Purchasing**

The proposed changes may limit boards' ability to act for their local context; ministerial staff in Toronto may not fully understand local contexts and what is needed to offer supports from both an education perspective but also from a community hub perspective.

Increased ministerial authority over capital decisions risks reducing the responsiveness of the education system to local contexts, with the issue being amplified in francophone communities where there is growth and where long-standing infrastructure needs exist.

We recommend that Bill 101 be amended to

- Require a documented local-needs rationale and consultation with affected communities before the Minister makes or overrides major capital and land decisions.

## **Governance and Management**

Bill 101 proposes restructuring school board leadership by redesignating the Director of Education role into a Chief Executive Officer (CEO) for financial operations and requiring the appointment of a Chief Education Officer (CEdO) focused on student achievement and pedagogy. The CEO must hold prescribed business qualifications, while the CEdO must be a member of the Ontario College of Teachers (OCT) or hold equivalent qualifications.

A CEO position based on business qualifications without education experience is concerning. It is possible that the model of shared leadership with distinct areas of expertise, business and education, is a formula that will result in better use of funds and better outcomes for students. However, leadership is a relational endeavour that should be grounded in educational knowledge at the school board level. Transferring authority to CEOs

rather than educators (current directors of education), supported by individuals with financial expertise increases the risk of misalignment between financial and pedagogical decision-making. In many districts, the leadership model already includes someone with a business background in the superintendent of business role. Simply redesigning that role, under the leadership of the CEdO could meet the government's objectives. We would further support that mechanisms be put in place to ensure that the two individuals work together. Furthermore, the "simple" requirement of having OCT certification for the CEdO role is a concern and additional qualifications or education experience should be a requirement. If the OCT certification is the only criteria, someone could access that role who completed their teacher education program many years ago and never worked in a school or board. This would not align with the intention of the role to provide direction for teaching and learning programs. We recommend that the CEdO have recent educational leadership experience and the supervisory officer qualifications, at a minimum.

While the Bill does have provisions for the CEO and CEdO to be the same person, it is possible that in some areas of the province, particularly smaller boards, having a CEO and a CEdO will make a larger senior team than what currently exists. This may increase board expenses when those funds could be best used to support student programs.

We recommend that Bill 101 be amended to

- **Ensure pedagogy-first accountability:** Require that the CEdO lead the board's education mandate and that the CEO role be hired by, and accountable to, the CEdO with clear responsibilities and dispute-resolution mechanisms.
- **Strengthen CEdO qualification requirements:** Require recent K–12 educational leadership experience and supervisory officer qualifications (not solely OCT

certification or equivalency). Where applicable, require the CEdO and CEO to have the competencies needed to serve the system (e.g., French-language proficiency in French-language boards and Catholic faith requirements in Catholic boards) in order to support and protect minority-language and denominational education rights.

- Provide flexibility for small boards: Allow exemptions or alternative compliance pathways, such as shared services or phased implementation where requiring separate CEO and CEdO positions would increase overhead and divert funds from student programming, while preserving the CEdO's student-achievement authority.

## **Labour Relations**

- Differences in governance modernization between English- and French-language boards create uncertainty about future expectations for leadership roles across the province.
- Having employers directly at the table for English-language boards may provide more aligned implementation processes particularly when issues of interpretation arise.
- There are concerns amongst principals and vice-principals that this model may create situations where there is collusion on local issues and in the application of provincial provisions by members of the Council of Ontario Directors of Education.

We recommend that Bill 101 be amended to

- Establish a mechanism by which the revised labour relations model may be evaluated and amended.

## **Ensuring More Consistent and Effective Learning Experiences**

This section appears to prioritize standardization while giving insufficient consideration to how students, including those with special needs or from traditionally underserved groups, actually experience learning. These groups of students are notably absent from the proposed changes described in the media briefing. Standardized testing and Ministry-approved resources are characterised as innovative or beneficial; however, teachers typically utilise a variety of resources and strategies, including guiding students through online information. Overall, the proposed changes seem somewhat dated and do not fully align with the realities of contemporary 21st-century classrooms approaches to teaching and learning.

In addition, the proposed changes in this section are contrary to what evidence tells us about how students learn and how to best create safe learning environments for all students. Taking the time to consult evidence-based sources and having meaningful engagement with educators would ensure that the core issues are being addressed in a way that is truly responsive, with long-term impacts that are aligned with current and future societal realities and expectations.

We are concerned that the changes proposed in this section of the Bill will increase the risk of litigation around human rights and equitable access to education.

## **Use of Consistent or Ministry-Approved Learning Resources in Classrooms**

Bill 101 proposes to mandate the use of consistent, Ministry-approved learning resources in classrooms to enhance student success and standardize education quality across all Ontario boards.

We are concerned that mandating the use of resources may create loss of contextualization and limit teachers' ability to use their professional judgement and support innovative, evidence-based approaches to teaching and learning. Again, we are seeing a proposal through this Bill that will result in "sameness" across the province while research shows that education systems in which students flourish are those where we centre students through the implementation of such effective pedagogical practices and frameworks as universal design for learning and differentiation. The idea of consistent learning resources also goes against current formats of curriculum documents that focus on students' demonstration of learning expectations not attached to specific resources. Requiring specific resources will likely reduce student-driven learning.

Provisions could be included in the Bill to create a provincial committee of Ministerial staff and educators whose mandate is to inform the development of resources and the approval process. The committee should include strong representation of traditionally underrepresented and underserved groups.

We recommend that Bill 101 be amended to

- Create an educator-led resource review and approval committee: Establish a standing provincial committee of educators, researchers and ministry staff, with strong representation from traditionally underrepresented and underserved groups to inform the development, selection and approval of any Ministry-approved learning resources.
- Preserve professional judgement and local flexibility: If consistent resources are required, explicitly permit boards and educators to use supplementary resources

where needed to support universal design for learning, differentiation and local student needs.

## **Exams and Assessment Standards for Secondary School Students**

Bill 101 proposes to introduce mandatory written exams for Grades 9–12, link final marks to attendance and participation and aims to standardize assessments across boards. This is further evidence of a desire to move toward standardization and a return to dated practices that are not supported by evidence.

From our experiences on the frontlines, and based on evidence, we know that exams rarely help students improve their mark: an exam mark does not fully or accurately assess their understanding of the course material.

It is also unclear how assessments will be standardized across boards and whether they will be the same in every board or locally developed.

We recommend that Bill 101 be amended to

- Require consultation and transparency before exam regulations are set: Make consultation with education partners, including principals, a statutory condition for any regulations on standardized secondary exams, and require the Ministry to publish the intended model (province-wide vs. context-dependent) and implementation timelines.
- Maintain valid, evidence-based assessment that reflects demonstrated learning: If written exams are introduced across all courses, require that they be designed to be valid and reliable measures of course expectations and that assessment policies

continue to prioritize demonstrated learning with flexibility and accommodations for diverse learners, rather than returning to one-size-fits-all practices.

### **Attendance and Participation as Part of Student Evaluation**

The media briefing that accompanies Bill 101 proposes that student participation will count for 15 per cent of final marks in Grade 9 and Grade 10, dropping to 10 per cent in the senior years with the aim to address rising rates of absenteeism.

Bill 101's approach contrasts with Ontario's Growing Success policy, which stresses that grades should reflect demonstrated learning. Tying grades to external factors such as attendance and participation risks undermining the core purpose of assessment, which is to provide fair and meaningful feedback. Any changes to evaluation methods should ensure that grades remain a reliable indicator of student achievement, in line with Ontario's established guidelines.

We note several concerns with this portion of the Bill:

- Grading attendance may reinforce inequities, as certain absences (like sports-related or vacations) are considered acceptable while others are penalized. For students who have challenges attending school regularly, their mark may not accurately reflect what they know.
- There are unresolved questions about acceptable absences and how to address the root causes of absences considered to be unjustified. For example, some students are absent because they are experiencing mental health issues, social anxiety or are disengaged. There are students who are absent because they have responsibilities at

home due to their family situation (i.e. caring for younger siblings) and who will be unduly penalized by this requirement.

- There have been major efforts to adopt Culturally Relevant and Responsive Pedagogy (CRRP) and involve traditionally underserved groups in decision-making to build safe learning environments. A shift to a one-size-fits-all method will likely lead to higher absenteeism, feelings of exclusion and greater disengagement among students who have historically been marginalized. This is contrary to the goals set out by the government for the proposed changes.
- Including a participation mark unduly penalizes students who may not choose to participate because of learning difficulties, high anxiety or their knowledge of the language of instruction. A quiet student isn't necessarily incapable but may not feel comfortable speaking or perhaps doesn't have the kind of relationship with the teacher or their classmates where they feel comfortable. Assessing participation is also challenging as it may include small or large group participation and teachers may not be able to observe all aspects of student participation, for example, in the case of a quiet student.
- The proposed changes related to attendance and participation appear to create circumstances that invite conflict. Specifically, there will undoubtedly be situations where a parent or student disagrees with an attendance or participation mark. The lack of clear direction on permissible absences is another source of potential conflict. Ultimately, principals and vice-principals are responsible for managing the conflict and resolving the issue. This will result in yet another workload issue for

principals and vice-principals who are already overwhelmed. It will also reduce the time available to support student learning and school leadership.

We recommend that Bill 101 be amended to

- Keep grades tied to demonstrated learning: Do not require attendance/participation to be a fixed percentage of final marks; instead, align any approach with Growing Success and require clear, province-wide definitions for eligible absences and accommodations so marks remain a reliable indicator of achievement.
- Focus on why students are missing school: Require the province and school boards to set up a joint process to identify the main reasons students are not attending and to put evidence-based supports in place to bring them back, recognizing that adding a participation mark across all courses will not address the root causes of absenteeism or student disengagement.
- Create a simple dispute resolution pathway: Require a consistent, time-limited review process for attendance and participation concerns to reduce conflict and prevent added workload from defaulting to principals and vice-principals.

### **Removal of School Climate Survey Requirements**

Rendering the school climate survey optional may reduce some administration work.

However, where boards choose not to continue the survey, the impact will be that student voice is potentially silenced along with the voice of marginalized community members.

While other mechanisms exist for students, staff, caregivers and community members to voice concerns, the loss of an anonymous process will likely result in individuals not coming forward. This is compounded by the lack of any other mandated demographic data

collection. The collection of this data has previously been mandated but not implemented or enforced.

The ability to develop effective strategies based on the strengths and areas of growth identified by a large subset of the school-based community will be replaced by a small subset who raise concerns. As a result, priorities may not reflect the needs of the community.

We recommend that Bill 101 be amended to

- Maintain mandatory school climate surveys province-wide, and set minimum consistency standards (common core questions, clear definitions and optional demographic questions, administration frequency, and public reporting timelines), so results are comparable and can reliably inform improvement planning.

## **Modernizing the Education System**

The principals' associations have advocated for a return to a one-year Initial Teacher Education program for some time. In fact, our recommendation was that the program include an optional paid co-op or mentoring placement to address staffing needs. The change to a 12-month program with increased practicum time addresses both elements we had been advocating for.

The government has provided tuition relief for many sectors in Ontario. We would like to see similar support for initial teacher education students. We believe this would help to attract more candidates to the profession, especially given recent change to the Ontario Student Assistance Program (OSAP) funding.

The change to a 12-month program improves accessibility for those contemplating career changes by reducing the financial impact on them over time. It will also allow more expertise from other sectors to enter teaching. Together with tuition relief programs, these changes should result in increased numbers of student teacher candidates.

## **Cross-cutting Recommendations**

In addition to the section-specific recommendations above, we recommend that Bill 101 be amended to

- Add a clear duty to consult education partners, including principals and, where applicable, French-language and denominational rights-holders before key regulations are made or high-impact powers are exercised.
- Restrict the Minister's authority to create policies on the assessment of student achievement or the use of educational materials in instruction unless these policies are evidence-based and created with input from educators.
- Phase in major changes through pilots and timelines that allow the ministry and boards to adjust based on evidence before full province-wide rollout.
- Tie any new requirements to practical implementation supports (resources, training and a clear dispute-resolution pathway) to avoid downloading additional workload and conflict to schools.

We stand with the Ontario Government in ensuring the dedicated teachers and education workers, who serve on the frontlines in our classrooms every single day, have the tools they need. By working together, we can do more to provide high-quality education that better serves students, families and educators across the province.

Thank you for your time. We look forward to discussing this important topic further.

Regards,



Dany Dumont, Président

L'Association des directions et des directions adjointes des écoles franco-ontariennes  
[president@adfo.org](mailto:president@adfo.org)



Ralph Sharples, President

Catholic Principals' Council of Ontario  
[president@cpco.on.ca](mailto:president@cpco.on.ca)



Jeff Maharaj, President

Ontario Principals' Council  
[jmaharaj@principals.on.ca](mailto:jmaharaj@principals.on.ca)

## Background

The ADFO, CPCO and OPC represent and support more than 8,200 principals and vice-principals in schools across Ontario. Together, they advocate and provide opportunities for their members to develop strong and inspiring educational leadership.

### **Association des directions et directions-adjointes des écoles franco-ontariennes**

The [Association des directions et directions-adjointes des écoles franco-ontariennes \(ADFO\)](#) brings together more than 650 dues-paying principals working in the twelve Francophone school boards of Ontario. ADFO actively contributes to the professional development and training of its members. The association also works to defend their rights and promote the profession.

### **Catholic Principals' Council of Ontario**

[CPCO](#) is the professional association for Principals and Vice-Principals in Ontario's Catholic school system. Our mission is to support and advocate for our over 2,200 members, helping them become innovative leaders in Catholic education. We embrace our Catholic values in all that we do, enhancing education across the province. We are dedicated to fostering a culture of diversity, equity, and inclusion, ensuring that every Associate feels valued and empowered to contribute their unique perspectives.

### **Ontario Principals' Council**

The [Ontario Principals' Council \(OPC\)](#) is the voluntary, professional association representing practising principals and vice-principals in Ontario's public schools. Our 5,500 Members represent elementary and secondary school leaders from across Ontario and operate within the ethical guidelines of the Ontario College of Teachers.

The goal of the OPC is to empower every Member throughout their leadership journey by advancing inclusive, innovative learning communities through advocacy, learning opportunities and support.