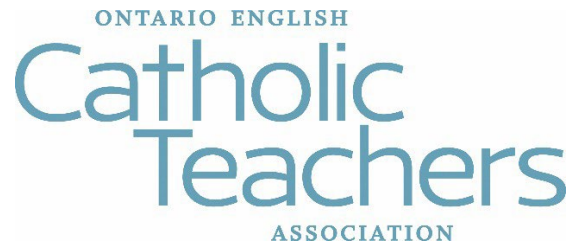




Proposed Amendments to RRO 1990, Regulation 298 and Regulation 304

**Submission to the
Ministry of Education**



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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INTRODUCTION

The Ontario English Catholic Teachers' Association (OECTA) welcomes the opportunity to provide input on behalf of 45,000 teachers working in publicly funded Catholic schools in Ontario, in response to the Ford Conservative government's proposed changes to the Revised Regulations of Ontario (RRO) 1990, Regulation 298 and Regulation 304.

The proposed regulatory changes – which were posted quietly in the middle of summer with no advance warning to, or consultation with, the Association or other education sector stakeholders – would provide school boards additional ways to organize the school day (Reg. 298) and mandate the recognition of Ontario Day on June 1, annually (Reg. 304).


Looking specifically at the proposed regulatory amendments, the Ministry of Education has characterized the changes as follows:

School Day Operations

- An amendment to Section 3, Daily Sessions, of RRO 1990, Regulation 298 would provide school boards with the ability to structure their school day schedules for students in Kindergarten to Grade 6 (primary and junior divisions) based on local needs and to maximize student learning. This includes new flexibility in the scheduling of recess and lunch – for example, schools may choose to offer one longer recess period in place of two shorter ones, while still providing a lunch break.
- Schools would continue to ensure a minimum of 300 minutes of total instructional time, a minimum of 40 consecutive minutes for lunch for students and teachers, at least one recess for primary and junior students, and a minimum total time for lunch break and recess of 60 minutes for primary and junior students, which is no different than the minimum break time available now.

Celebrating Ontario Day

- Amend RRO 1990, Regulation 304 to require school boards to recognize



"Ontario Day" on June 1 each year (or, when June 1 is a Saturday or Sunday, on the preceding Friday). This would provide students with the opportunity to learn about and celebrate key milestones in Ontario's history and the contributions Ontarians have made to Ontario and Canada's broader social, economic, political, and cultural fabric.

For the purposes of this submission, the Association will focus exclusively on the proposed amendments to RRO 1990, Regulation 298: Operation of Schools – General.

In effect, this proposed amendment would allow a school board to alter the organization of the school day, such as by adopting a "balanced day" approach – dividing the school day into three instructional blocks separated by two nutrition and/or activity breaks, rather than the traditional structure of two recesses and a longer lunch break.

It is important to note at the outset that this submission does not draw conclusions on the merits of a balanced day approach. Research highlights its potential benefits in certain circumstances but also underscores concerns and challenges (Moffat 2025; NBPTS 2016; Wu et. al, 2015 Woehrle et al. 2005). There is broad agreement that additional research is needed in order to fully understand the impact the balanced day has on student learning, physical and mental health, teacher lesson planning and classroom management, the logistical organization of schools, and other factors.

At the same time, it should be mentioned that a full and comprehensive legal analysis of the potential consequences of the proposed amendments is not possible given the overly restrictive submission timelines arbitrarily imposed by the ministry.

With that said, a review of the proposed amendments to Regulation 298 raises a series of important questions and issues related to decision-making processes – at the school board and government levels – that the ministry must address before any regulatory changes are implemented. In particular, the Association is highlighting concerns related to the following four categories:

- School board decision making and respecting collective agreements
- Questions arising from the proposed amendments to Regulation 298
- Lack of government consultation and adherence to process

- Inadequate or non-existent implementation plan

SCHOOL BOARD DECISION MAKING AND RESPECTING COLLECTIVE AGREEMENTS

A key question arising from the proposed amendments to Regulation 298 concerns the manner by which school boards would be empowered to make determinations about organizing the school day, and which stakeholder groups and community voices – if any – would have the opportunity to inform those decisions.


However, this question should be considered moot. It is critical to remember that a number of local collective agreements currently include language related to the structure of the school day. This language is arrived at through the constitutionally protected collective bargaining process and ensures that the unique perspectives of the signatories, including Catholic teachers, are taken into account.

In addition, the central terms of Part A of the collective agreement signed by OECTA, representatives of the Crown, and the Ontario Catholic School Trustees' Association (OCSTA) include requirements for consultation. **It is Catholic teachers' firm expectation that the government will respect and uphold current collective agreement language.**

QUESTIONS ARISING FROM THE PROPOSED AMENDMENTS TO REGULATION 298

Unfortunately, given the broad and vague description of the proposed regulatory amendments posted by the government, Catholic teachers can only speculate as to some of the impacts that altering the organization of the school day could have on teachers, students, and the school community. Some of these factors include:

- **Potential impact on students:** Research indicates that students from certain demographic communities are disproportionately disadvantaged by a reorganization of the school day. For instance, students from families in lower socioeconomic groups may rely upon the traditional lunch period as their primary and most substantial meal of the day (Moffat 2025; Jackson 2015; Alamenciak 2015). As such, shortening the lunch period could pose equity and nutrition concerns for these students.


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- **Potential impact on teachers:** Studies highlight that extending the instructional period could result in classroom management issues for teachers, especially when classroom composition is not taken into account. This, in turn, can lead to higher reporting levels of teacher mental health concerns and “burnout” (McLean and Corbin 2025; Walker 2016). Within a non-traditional school day structure, teachers also report a diminished capacity to collaborate with their colleagues (Woehrle et al. 2005). As well, without ample time for implementation, teachers would be left in the unfair position of reorganizing their lesson plans and pedagogical approaches potentially on very short notice.
 - **Staffing implications:** The proposed regulatory amendment applies only to Kindergarten to Grade 6. However, most publicly funded Catholic schools include students from Kindergarten to Grade 8. In addition, altering school day organization could potentially pose staffing and operational issues with respect to itinerant teachers, supervision requirements, occasional teachers, and teachers who teach across multiple grades.

To reiterate, this discussion should not be interpreted as an argument for or against adopting a balanced day in any particular school board. Instead, it is meant to underscore **Catholic teachers’ insistence that the government uphold collective agreements and the collective bargaining process, including requirements for consultation.**

LACK OF GOVERNMENT CONSULTATION AND ADHERENCE TO PROCESS

On the issue of consultation and process, Catholic teachers once again must express our profound disappointment with the Ford Conservative government’s refusal to consult meaningfully with our Association and other education stakeholders ahead of posting the proposed regulatory amendments.

As the frontline workers in the field of education, teachers possess firsthand knowledge and experience of how education policy works in the classroom, and which practices and methods are most conducive to student success.



Genuine, meaningful, and proactive consultation with teacher and education worker unions, and other education stakeholders, could help to guide decisions about education policy in a way that would minimize disruption for students and ensure positive outcomes over the long run.

Unfortunately, the Ford Conservative government seemingly demonstrates a perverse pride in dismissing the expertise and recommendations of teachers and education workers. The proposed regulatory amendments are no exception.

Not only did the government fail to consult with our Association in developing the proposed amendments, we also were given no advanced warning that the amendments were being posted.

Added to this, the government provided only three business days to offer comment on regulatory amendments that could have substantial implications for teachers and their professional practice.

This conduct is unbecoming of a government that purports to be “for the people” and “for workers.” Ontario’s teachers are trained, certified professionals – they deserve far more respect than has ever been afforded by this government.

It should also be noted that during the last round of collective bargaining the government never raised the issue of school day organization at the central negotiating table. By proposing regulatory amendments now, the government, in effect, is bargaining through regulation. As such, **Catholic teachers strongly recommend that the government immediately rescind the proposed regulatory amendments and respect the collective bargaining process.**

Moving forward, it will be a far better use of everyone’s time and resources for the **government to engage in regular, open, and constructive dialogue with teachers and education workers, and to heed the advice of those on the frontlines of publicly funded education.**



INADEQUATE OR NON-EXISTENT IMPLEMENTATION PLAN

As a consequence of the Ford government's suboptimal approach to policymaking, it often finds itself in the position of announcing broad and sweeping changes that lack any detail or specificity. Such is the case with the proposed regulatory amendments under consideration.

The relevant entry on the Ontario Regulatory Registry website contains only a vague outline of the proposed amendments, with no analysis of the regulatory impact, no plan of implantation, and no indication of how stakeholder feedback will be addressed – if it is considered at all. With no additional information or communication from the ministry, our Association and others are left to wonder when these amendments would come into force and how they would be implemented.


Catholic teachers urge the government to dispense with its usual practice of rushing through policy implementation, and instead ensure that any potential regulatory changes include due consideration for the resources, supports, and time that teachers need in order to effectively integrate changes.

CONCLUSION

The Ford Conservative government's treatment of teachers and education workers in Ontario has repeatedly demonstrated a lack of respect for the profession and the vital role teachers play in shaping the future.

Too often, decisions are made unilaterally without input from the frontline professionals who work directly with students every day. This approach not only disregards the expertise of educators but also leads to poorly planned and executed policies. The proposed amendments to Regulation 298 – posted quietly in the middle of summer, with no consultation or advance notice, and with limited time to provide comment – will not serve students and our school communities.

Everything that we are proud of as Ontarians starts in our classrooms. We call on Premier Ford, Minister Calandra, and the provincial Conservative government to reconsider these proposed regulatory amendments, consult meaningfully with Catholic teachers and heed



the recommendations outlined in this submission, listen to the voices of teachers and community advocates, and make the necessary investments in the supports that truly serve the best interests of our students and Ontario's publicly funded education system.

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