



## LDAO SEAC CIRCULAR

### September 2025

The Learning Disabilities Association of Ontario (LDAO) SEAC Circular is published 5 times a year, usually in September, November, February, April, and June.

Each circular highlights key topics for your SEAC to consider, along with action items, questions to ask, and recommendations for effective practices where applicable.

Feel free to share any of this information and any attachments with other SEAC members. As always, if you plan to introduce a motion for the consideration of SEAC, it is particularly important that you share all relevant background materials with your fellow SEAC reps.

#### **Topics covered by this SEAC Circular:**

- 1. Ministry of Education — School Boards Placed Under Review or Supervision**
- 2. Ministry of Education Updates: Curriculum Implementation on Hold**
  - [Kindergarten Curriculum](#) – Implementation on Hold
  - [Financial Literacy Curriculum](#) – Implementation on Hold
  - [Black History Education](#) – Implementation on Hold
  - [Transition Funding](#) – Renewed Funding
- 2. LDAO – Response to the Auditor General**
  - Special Education Policy and Program Delivery Review (Appendix)
- 4. Key Takeaways: September 2025 LDAO SEAC Circular**

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#### **List of Supplementary Materials**

1. [2025–2026 School Year Calendar \(Ontario Ministry of Education\)](#)
2. [Special Education Advisory Committee](#)
3. [Accessible Transitions for Students with Disabilities in K-12](#)
4. [LDAO's Open Letter to SEACs \(2025\)](#)

**Note:** SEAC members can also access past [SEAC Circular](#), [LDAO SEAC Policies](#), [LDAO Policy Statement on Educational Inclusion](#), and [PAAC on SEAC Effective Practices Handbook](#).

You can access Ministry funding (B & SB) memos by date at: [Ministry Funding](#).

## 1. Ministry of Education

### a) School Boards Placed Under Review or Supervision

#### **Background and Context**

Between April and June 2025, the province increased oversight of several boards: on April 29, 2025, a supervisor was appointed to the Thames Valley District School Board; on June 27, 2025, supervisors were appointed to Toronto District School Board, Toronto Catholic District School Board, Ottawa-Carleton District School Board, and Dufferin-Peel Catholic District School Board.

Supervisors appointed by the Minister now oversee financial operations, policy implementation, and governance, reporting directly to the Minister of Education. As a result, the authority of elected trustees has been suspended, and critical board functions — including SEAC meetings — have been paused or significantly altered.

#### **Implications for Students with Special Needs**

The placement of boards under provincial supervision has serious implications for students with special education needs and for SEAC's ability to fulfill its advisory role:

- **Disrupted Governance:** With trustees no longer involved in decision-making, SEAC's traditional channels of influence are reduced.
- **Suspension of Meetings:** A pause in SEAC meetings may delay the review and implementation of essential programs and services, as well as the board's special education plan.
- **Risk of Service Delays:** Without SEAC's regular input, there may be delays in addressing student needs, implementing IEPs, and responding to family concerns.

Despite these challenges, SEAC remains a legally mandated committee under Ontario Regulation 464/97, with a critical role in advising on special education services. The Ministry or its appointed supervisor is still expected to receive and consider input from SEAC. However, navigating these new governance structures may present communication and operational challenges that require strategic attention.

#### **Duration of Supervision**

The Minister of Education has not provided a projected end date for these supervisory appointments, stating that they will remain in effect “for whatever time is needed” to restore financial health. This means provincial oversight may extend beyond the next school board elections in October 2026. SEAC members at affected boards should plan accordingly for a potentially extended period of altered governance.

### **Potential Action Items, Questions to Ask, and/or Recommendations:**

- Request clarity from the appointed supervisor on how SEAC input will be received and considered during this time.
- Ask whether SEAC meetings will resume, and if so, under what structure and timeline.

**Note:** The Brant Haldimand Norfolk Catholic District School Board was reviewed, not supervised. The independent review concluded with a final report delivered in March 2025. Unlike the supervised boards, trustees at BHNCD SB have retained their authority, and SEAC meetings continue under the board's regular governance structure.

## **2. Ministry of Education Updates**

### **a) Kindergarten Curriculum Implementation on Hold**

#### **Background and Context**

The Ministry of Education had previously announced a revised Kindergarten curriculum, scheduled for implementation in September 2025. This “Back to Basics” model was intended to strengthen foundational literacy and numeracy skills through direct, explicit instruction. It was designed to align with the updated Language curriculum (Grades 1-8) and reflect key recommendations from the Ontario Human Rights Commission’s Right to Read report, including the use of early reading screeners in Year 2.

The Ministry has now placed the implementation of the revised Kindergarten curriculum on hold. According to the Minister of Education, the delay is intended to allow for a more consistent provincial rollout and to provide educators with additional time to prepare for implementation. Similarly, the Ministry has paused the rollout of the new Financial Literacy and Black History curricula for the same reason.

#### **Implications for Students with Special Education Needs**

The emphasis on structured, explicit instruction offers significant benefits for students with special education needs. However, the delay in the implementation of this revised curriculum has implications for students with special education needs, namely:

- **Early Identification and Intervention:** This delay will affect the province-wide rollout of Year 2 Kindergarten reading screeners — a critical tool for identifying students who may be at risk for reading difficulties. Some school boards may continue with early screening, but without the revised curriculum, implementation will vary across the province.

- **Alignment with Right to Read:** Although this curriculum implementation is on hold, the principles of explicit, evidence-based reading instruction remain a priority. School boards across the province have and will continue to explore and implement practices in alignment with the Right to Read report.

### **Potential Action Items, Questions to Ask, and/or Recommendations**

- Ask how the delay will affect early years programming, particularly for students with special education needs.
- Inquire whether early reading screeners are being used despite the delay and how the board is tracking this information.
- Ask whether professional learning for Kindergarten educators is continuing during the pause, to ensure they are prepared to deliver explicit instruction and implement the curriculum effectively once it proceeds.

### **b) Financial Literacy Curriculum – on hold**

#### **Background and Context**

The Ministry of Education announced a new Financial Literacy curriculum scheduled to begin in September 2026. Students would be required to complete this compulsory component in their Grade 10 mathematics course, achieving a score of 70% or higher in order to earn their high school diploma.

#### **Implications for Students with Special Needs**

Financial literacy is a critical life skill for students with special education needs. The delay in implementation postpones access to structured, explicit instruction that could help students build independence, confidence, and practical skills needed to manage real-world tasks.

#### **Potential Action Items, Questions to Ask, and/or Recommendations:**

- How will teacher capacity be developed to ensure educators understand Universal Design for Learning (UDL) and differentiation strategies to meet the needs of diverse learners?
- How is the board planning to support students with special education needs in meeting the Financial Literacy requirement once it is implemented?

## c) Black History Education – on hold

### **Background and Context**

The Ministry of Education had planned to implement mandatory Black History learning in Grade 7,8 and 10 beginning in September 2025. This curriculum was designed to cover both pre- and post-Confederation history, ensuring students learn about the diverse experiences and contributions of Black Canadians throughout Canada's history.

Students in Grades 7 and 8 would focus on Black History prior to Confederation, while students in Grade 10 would explore the experiences of Black Canadians after World War II. The intent was to help students develop the skills to identify, respond to, and challenge harmful assumptions and stereotypes.

### **Implications for Students with Special Needs**

The Black History curriculum was designed to promote equity, representation, and cultural understanding. The pause in implementation means that students with special education needs who also identify as Black or racialized may continue to experience a lack of representation and limited opportunities to see themselves reflected in the curriculum.

### **Potential Action Items, Questions to Ask, and/or Recommendations:**

- Request a professional learning plan that outlines how educators will be supported in 2025-2026 to prepare for future curriculum implementation.
- Ask how the board is embedding inclusive practices and diverse perspectives into current instruction while awaiting the formal rollout of this curriculum.

## d) Transition Funding – 2025-2026

### **Background and Context**

The Ministry of Education has renewed funding for the Transition Navigator role in each school board for the 2025–2026 school year. This initiative is designed to strengthen transition planning and support for students with special education needs.

Effective transition planning plays a vital role in improving educational outcomes by ensuring that students receive the necessary support to succeed in their chosen pathways. Transitions may occur between classrooms, from elementary to secondary, or from secondary school to post-secondary, employment, or community living.

The Transition Navigator role is focused on developing, sharing, and promoting evidence-based transition practices and resources. Their work aims to ensure consistency across

school boards and to intentionally address the unique needs of students with disabilities throughout the transition process.

### **Implications for Students with Special Needs**

The Transition Navigator role is critical to ensuring that students with special education needs experience smoother, personalized transitions and continuity of support. Effective transition planning also helps to prevent service gaps and fosters strong collaboration among educators, families, and community partners — all of whom are integral to student success. For example, a Transition Navigator could:

- Ensure that IEPs are shared and reviewed with receiving educators before the start of the school year, so accommodations and supports are in place from day one.
- Coordinate transition meetings with families and school staff to discuss strengths, needs, and goals, reducing uncertainty and fostering student confidence.
- Connect students and families with community resources (e.g., employment programs, post-secondary supports, or disability services) to strengthen planning for life beyond school.

### **Potential Action Items, Questions to Ask, and/or Recommendations:**

- Request a review of the impact of the Transition Navigator in Year One and the goals identified for Year 2
- Is the work of the Transition Navigator making an impact? How is this being measured?
- Inquire how families are being engaged in the transition planning process and whether their feedback is shaping board practices.

## **3. LDAO – Response to the Auditor General**

### **Background and Context**

At the end of June 2025, the Provincial Parent Association Advisory Committee on Special Education (PAAC) was invited to participate in a consultation with the Office of the Auditor General as part of an audit examining the special education landscape in Ontario. Due to the limited timeline provided, PAAC members had constrained opportunity for full participation.

During the preliminary meeting, it was agreed that each organization represented on PAAC would be given the opportunity to respond individually to the Auditor General's questions, sharing perspectives informed by the communities they serve.

In LDAO's response, we highlighted key themes and findings from across the province:

- Inconsistent implementation of educational policies, resulting in inequitable access to support, assessments, and accommodations for students with learning disabilities (LDs) and ADHD.
- Extended delays and waitlists for psychoeducational assessments and access to Tier 3 interventions, particularly in remote and rural communities
- Exclusion of students from learning opportunities both formally or informally (e.g., exclusion due to staffing shortages, perceived behavioural risks or time allocated for “program development”).
- Inconsistent implementation of IEPs, including delays in execution, limited access to tailored supports, and underutilization of professional assessment.
- Need for consistent professional development for educators in areas such as structured literacy, development of executive function skills, universal design for learning (UDL) and assistive technology.

In addition to outlining these challenges, LDAO’s submission to the Auditor General also set out core priorities for system strengthening, including sustaining Tier 2 and Tier 3 supports, maintaining a continuum of placements, strengthening transition planning, reinforcing the IPRC process, stabilizing staffing and professional learning, reducing waitlists, and addressing equity gaps.

### **Implications for SEAC Members**

The audit reflects a broader effort to scrutinize and strengthen special and inclusive education across Ontario, aligned with the Ministry’s increased financial oversight of school boards. While the audit emphasizes accountability, it also creates an opportunity to spotlight systemic gaps and advocate for improvements.

The Auditor General’s findings — expected to be released in December 2025 — may lead to significant policy recommendations and changes in service delivery. SEAC members should be prepared to review and respond to these recommendations in the context of their board’s special education programs and services.

### **Potential Action Items, Questions to Ask, and/or Recommendations:**

- Request data on student exclusions, including the number of students affected and the reasons for the exclusion
- Inquire about professional learning plans for the upcoming school year, specifically regarding:
  - Effective IEP implementation





- Integration of UDL principles in classroom practice
  - Use of Assistive Technology
- Ask how the board monitors the effectiveness of professional development initiatives.
- Seek information on the number of students with both formal and informal IEPs, and whether there is a plan to transition students with informal support to formal IEPs.
- Request information on parent engagement processes, including how the board gathers feedback on IEP implementation and supports parent understanding of the IEP process.

#### 4. Key Takeaways: September 2025 LDAO SEAC Circular

- Since spring 2025, the province has increased oversight of several school boards. Supervisors have been appointed to Toronto DSB, Toronto Catholic DSB, Ottawa-Carleton DSB, Dufferin-Peel Catholic DSB, and Thames Valley DSB. Trustees' authority at these boards has been suspended, and key governance functions — including SEAC meetings — have been altered. The Brant Haldimand Norfolk Catholic DSB underwent a review, but trustees retained their authority and SEAC meetings continue as usual. SEAC remains a legally mandated committee under Regulation 464/97, and members should seek clarity on how their advisory role will function under these altered structures, particularly given the possibility of extended supervision beyond the 2026 board elections.
- The Ministry has paused implementation of several new curricula (Kindergarten, Financial Literacy, Black History), citing the need for consistency across the province and additional time for educators to prepare. SEAC members should ask how boards are maintaining momentum in these areas despite the pause.
- Funding for the Transition Navigator role has been renewed for 2025–2026. This provides an opportunity to strengthen transition planning across boards and ensure that families are meaningfully involved in the process.
- LDAO's response to the Auditor General highlighted province-wide gaps in policy implementation, assessments, IEP consistency, and access to interventions. The Auditor General's report (expected December 2025) may bring significant policy recommendations that SEAC members should be prepared to review and act upon.



**LDAO – Advocacy in Action**  
Share Across Your Networks

**A Note to SEAC Representatives**

LDAO SEAC Representatives are encouraged to share this resource with other SEAC members in their school board. By spreading awareness and building collective understanding, we can strengthen advocacy efforts and improve outcomes for students with learning disabilities across Ontario.

**About the Learning Disabilities Association of Ontario (LDAO)**

The Learning Disabilities Association of Ontario (LDAO) has been a trusted voice for over 60 years, supporting individuals with learning disabilities and ADHD—as well as their families, educators, and communities. We provide expertly curated resources, advocate for systemic change, and promote equity in education and beyond.

Our signature initiatives—[LD@school](#), [TA@l'école](#), [LD@home](#), and [LD@work](#)—reflect our commitment to supporting individuals across the lifespan, from early learning through to adulthood and employment.

Learn more at [LDAO.ca](https://www.ldao.ca).

## Appendix — Full Submission

Submission to the Auditor General of Ontario: Special  
Education Policy and Program Delivery Review (pp. 1-22)

# Submission to the Auditor General of Ontario: Special Education Policy and Program Delivery Review

## **Submitted by:**

Learning Disabilities Association of Ontario (LDAO)

August 2025

## Executive Summary

The Learning Disabilities Association of Ontario (LDAO) is a provincial organization committed to advancing equitable, evidence-based supports for individuals with learning disabilities (LDs) and attention-deficit/hyperactivity disorder (ADHD). This submission responds to the Auditor General’s review of special education policy and service delivery across Ontario and reflects direct input from families, educators, and system partners across the province.

### **Key Challenges Facing Families and Students**

- **Inconsistent Policy Implementation:** Wide variation in how special education policies are applied has led to inequitable access to supports, assessments, and accommodations for students with LDs and ADHD.
- **Delays in Assessment and Identification:** Wait times for psychoeducational assessments, Tier 3 interventions, and appropriate placements remain a major barrier—particularly in under-resourced communities.
- **Addressing Gaps for Older Students:** Ensure that students who missed early identification and intervention benefit from targeted assessments, Tier 2 and Tier 3 interventions, and intensive transition supports. Without a clear system-wide plan, these students risk being left behind in a two-tiered system, with entrenched academic, social, and emotional gaps.
- **Inconsistent IEP Implementation:** Many students experience delays, outdated plans, or limited access to tailored supports. IEPs often lack continuity between school years, and professional assessments are underutilized.



- **Limited Family Engagement:** Families report unclear communication, rushed placement decisions, and difficulty navigating appeals—especially in equity-deserving communities. These challenges are magnified when communication is inconsistent, overly technical, or not culturally or linguistically responsive.
- **Gaps in Educator Capacity:** Without sustained training in structured literacy, a tiered approach to early identification and intervention, the development of executive skills (e.g., organization, planning, self-monitoring), universal design for learning (UDL), and assistive technology, educators are under-equipped to meet diverse learner needs. This gap is even greater for students with LDs whose needs intersect with ADHD, mental health challenges, or marginalized identities.
- **Loss of Specialized Programming:** The loss or consolidation of Tier 3 options has left many students without placements that meet their needs—contributing to exclusions and chronic absences.
- **Weaknesses in Transition Planning:** Ensure well-resourced, student-centred planning during key transitions, especially amid system restructuring.

### **Recommendations: Core Priorities for System Strengthening**

- **Tiered Supports:** Ensure consistent access to Tier 2 and Tier 3 interventions aligned with students' learning profiles. Formal identification remains a critical safeguard for ensuring direct, explicit instruction and sustained access to necessary supports.
- **Continuum of Placements:** Maintain access to specialized placements for students whose needs cannot be met solely in a general education setting. Decisions should be grounded in individual needs and supported by provincial investment—ensuring inclusion is purposeful, flexible, and not driven by quotas or limited resources.
- **Transitions:** System-wide year-end IEP reviews and funded transition meetings should be adopted to reduce instructional disruption each fall and ensure continuity of supports from day one.
- **IPRC Process:** Reinforce the value of formal identification to safeguard student rights and ensure programming is legally and professionally grounded.
- **Staffing and Capacity:** Fund professional learning and stabilize staffing to protect IEP fidelity, particularly during absences or transitions.



- **Waitlists and Identification:** Invest in service expansion and streamlined identification pathways to reduce delays in accessing assessments, specialized programming, and intensive interventions—particularly in high-needs and under-resourced areas.
- **Equity and Transparency:** Address systemic barriers that limit access to high-opportunity programs and specialized supports. Uphold student rights, and reduce regional disparities through strengthened provincial oversight and equitable funding.

### **Closing Message**

Students with LDs and ADHD deserve timely, individualized, and meaningful support—not just in policy, but in practice. While recent reforms mark important progress, sustained attention to implementation and system-wide coordination is essential to translate that progress into lasting impact.

We appreciate the Ministry’s ongoing work through [Policy/Program Memorandum 168: Reading Instruction and Early Reading Screening](#) and the [K–12 Education Standards Development Committee Final Report](#), and emphasize that the main challenge lies not in policy design but in consistent, well-resourced, and accountable implementation. Addressing systemic barriers—including ableism in policy, practice, and perception—is essential to ensuring that students with LDs and ADHD are not only included, but equitably supported to thrive. Doing so is not only an educational priority, but a fundamental human right.

This is an opportunity for Ontario to lead with evidence, equity, and collaboration—building a special education system that meets students where they are and grows with them across their educational journey.

LDAO remains committed to working alongside families, educators, school boards, and the Ministry to advance practical, scalable solutions. By investing in the right supports at the right time, we can ensure that every student with LDs or ADHD has the tools to succeed—and the confidence to thrive.

## Purpose of Submission

This submission is provided by the Learning Disabilities Association of Ontario (LDAO) in response to the Office of the Auditor General of Ontario’s review of special education policy and program delivery across school boards in Ontario.

LDAO is a provincial charity dedicated to advancing equitable, evidence-based supports for individuals with learning disabilities (LDs) and co-occurring attention-deficit/hyperactivity disorder (ADHD). Our response is grounded in direct engagement with families, educators, and system partners across the province—and reflects consistent, documented concerns regarding access, implementation, and accountability in special education.

This submission also draws on recent policy work, including our March 2025 Open Letter to SEACs (Appendix A), and highlights critical gaps that have emerged in the wake of provincial reforms to reading instruction and inclusive education.

We aim to provide a clear, systems-level view of the challenges students with LDs and ADHD are facing, and to underscore why targeted investment is urgently needed. Without robust, individualized supports—especially in areas like Tier 3 interventions, transition planning, and professional assessment—early gains risk stalling, and long-term outcomes for students with LDs and ADHD will remain deeply inequitable.

## Context

Ontario’s education system is undergoing a period of significant reform. Landmark efforts—such as the *Right to Read* inquiry, new language curriculum implementation, and mandated early screening—signal an important shift toward evidence-based instruction. These initiatives hold promise for students with LDs and ADHD, but only if they are accompanied by individualized, sustained, and well-resourced support as outlined in the [K–12 Education Standards Development Committee Final Report](#).

At the same time, many school boards are restructuring special education models in the name of inclusion—frequently reducing or eliminating Tier 3 placements that previously supported students with complex learning needs. When inclusive environments are not adequately resourced, students with LDs are left without the intensive interventions, continuity, and safeguards they require to succeed.

This is not a theoretical risk—it is a growing reality with tangible consequences. Across the province, families are reporting increasing instability in programming, increased student absences, and erosion in the clarity and consistency of placement and support options.

These issues are magnified for students with LDs and ADHD, who already face elevated risks of:

- School disengagement and exclusion
- Co-occurring mental health challenges
- Lower rates of graduation and employment
- Housing insecurity and long-term financial vulnerability

Learning disabilities are lifelong and neurologically based. But they are also addressable—and outcomes can change when students receive targeted, timely, and evidence-based support. This submission outlines key challenges and priorities for investment to ensure reforms translate into meaningful, measurable progress for students with LDs and ADHD.

## Key Challenges Facing Families and Students:

Across Ontario, families of students with learning disabilities (LDs) and ADHD continue to encounter systemic barriers that limit access to timely, effective, and equitable support. Despite promising policy developments—such as the implementation of universal early screening and new curriculum standards—persistent gaps in delivery, training, and communication mean that many students remain underserved. The following section outlines the most pressing challenges reported by families, educators, and community partners across the province.

- **Inconsistent Policy Implementation**  
Despite provincial guidelines, the interpretation and application of special education policies continue to vary significantly across school boards. This leads to uneven access to identification processes, service delivery, and accommodations—and contributes to widespread inequities for students with LDs and ADHD.
- **Delays in Assessment and Identification**  
Long wait times for psychoeducational assessments, limited access to qualified professionals, and an over-reliance on diagnosis as a prerequisite for support continue to delay timely and equitable intervention for students.  
  
Early identification must also be paired with maintaining high expectations for achievement. Supports should be designed to help students meet ambitious, attainable goals—avoiding the unintended lowering of academic standards that can occur when expectations are reduced instead of providing the necessary accommodations and interventions.



- **Addressing Gaps for Older Students**

While recent reforms—such as universal early screening mandated by the Right to Read recommendations—represent critical progress, they do not address the needs of students who have already moved through the early grades without access to timely assessment or intervention. For these students, learning gaps may be deeply entrenched, and the impacts—academic, emotional, and social—can be profound.

Students with LDs often struggle silently, especially in later grades where supports are fewer and expectations increase. Without a clear system-wide plan to identify and support these students, Ontario risks creating a two-tiered system—one for students benefiting from new reforms, and another for those left behind.

Targeted investment in diagnostic assessments, Tier 2 and Tier 3 interventions, and intensive transition supports is urgently needed to close these historical gaps and ensure that every student, regardless of when they were identified, has access to meaningful learning opportunities.

- **Inconsistent IEP Implementation:**

While the Individual Education Plan (IEP) is intended to be a living document, many students with LDs and ADHD experience delays in receiving updated plans, particularly at the start of the school year. These gaps can leave them without key accommodations, assistive technology, or targeted instruction during critical early weeks. Continuity is also a challenge—strategies and supports from the previous year are often not carried forward, forcing families to re-advocate for established needs.

Maintaining a multi-year record of IEPs within the Ontario Student Record (OSR) could help preserve effective strategies and ensure educators have a fuller picture of a student's learning history. This would support more seamless transitions between grades and schools, reduce duplication of effort, and protect against the loss of valuable instructional insights.

Professional assessments, which provide essential insight into a student's cognitive and learning profile, are frequently underutilized. Without this data, IEPs may rely solely on educator observation—valuable, but less precise—resulting in supports that are generic rather than targeted. Timely updates, year-end reviews, and integration of assessment data are needed to protect IEP fidelity and ensure supports are in place from day one.



- **Limited Family Engagement**

Parents frequently report difficulty understanding their rights, navigating the IPRC/IEP process, interpreting assessments, and knowing how to effectively advocate for their children. These challenges are magnified for families from equity-deserving communities—particularly when communication is inconsistent, overly technical, or not culturally or linguistically responsive. In many cases, these barriers lead to disengagement or mistrust in the system, especially when families feel excluded from decision-making or unsupported during critical transition points.

- **Gaps in Educator Capacity**

Many educators lack sustained access to professional learning in areas critical to supporting students with LDs and ADHD. These include structured literacy as emphasized in the Right to Read inquiry, a tiered approach to early identification and intervention, differentiated instruction, universal design for learning (UDL), strategies to support executive functioning, and effective use of assistive technology.

Strengthening pre-service teacher education in special education—including practical experience in developing and implementing IEPs, and meaningful engagement with student records such as the Ontario Student Record (OSR)—would help ensure new educators are ready to support students with LDs and ADHD from the start of their careers.

These gaps leave staff underprepared to meet the increasingly complex and evolving needs of students—particularly in inclusive classrooms where individualized support is essential. This is especially true for students with LDs whose learning needs intersect with ADHD, mental health challenges, or marginalized identities, where educators may require additional training in culturally responsive, trauma-informed, and anti-ableist practices to deliver truly equitable support. Implementation of the [K-12 Education Standards Development Committee Final Report](#) must be accompanied by dedicated funding and accountability measures to ensure that educators receive the training and tools required to translate policy into effective practice.

- **Loss of Specialized Programming**

The loss or consolidation of Tier 3 placements across many boards has reduced access to programs designed for students with complex learning needs. While inclusion in general education settings can benefit many, it is not a universal solution. Without specialized options, students whose needs cannot be met in a



regular classroom often face inappropriate placements, reduced instructional intensity, and increased risk of disengagement or school refusal.

Families and educators report that the reduction of Tier 3 programs has contributed directly to chronic absences and, in some cases, formal or informal exclusions. While exclusions should be rare and applied only after other supports and interventions have been considered, decisions must take the student's disability-related needs into account in accordance with the Ontario Human Rights Code. For students with LDs and ADHD, any exclusion should be accompanied by a re-entry plan involving parents and special education staff, and a review of whether required accommodations and modifications were being implemented prior to the incident. For some parents, private schools become part of the dialogue and a potential solution—reflecting a lack of confidence that the public system can provide the necessary intensity and consistency of support.

- **Weaknesses in Transition Planning**

Students with LDs and ADHD often face heightened challenges during key transitions—whether between grades, school levels, programs, or post-secondary pathways. These moments demand individualized, well-resourced planning and coordination—especially in the context of system restructuring, such as the closure or consolidation of Tier 3 programs, and should align with best practices outlined in the [K–12 Education Standards Development Committee Final Report](#).

This planning should engage all receiving educators—not only special education staff—so that IEPs and other supports are understood, accessible, and ready to implement from the first day. When classroom teachers are not connected to this process, critical supports can be delayed or overlooked, undermining the student's transition experience.

Placement and transition decisions must be grounded in each student's strengths and needs—not overshadowed by funding pressures or evolving service delivery models.

These challenges, while longstanding, are not insurmountable. With coordinated action, targeted funding, and clear accountability, Ontario has the opportunity to build a more responsive—and ultimately more sustainable—education system, where students with LDs and ADHD are not only included, but meaningfully supported to thrive.

## Recommendations: Core Priorities for System Strengthening

Ontario's publicly funded education system is at a pivotal moment—one that calls for proactive, coordinated, and well-resourced action. Addressing the gaps outlined in this submission will require more than small adjustments. The following priorities represent key levers for sustainable, equitable change. Each requires targeted investment and system-wide accountability—without which current reforms will fall short, and long-standing disparities for students with LDs and ADHD will persist.

- **Tiered Supports**

A robust tiered system is foundational to early intervention, ongoing progress monitoring, and timely escalation when students are not responding to universal instruction alone. School boards need sustained provincial support to strengthen access to Tier 2 and Tier 3 interventions—delivered by trained personnel and aligned with students' cognitive and learning profiles. While timely support should be available based on need, formal identification remains a critical safeguard for ensuring students receive and maintain the direct, explicit instruction and supports necessary for long-term success. These supports should be based on need, not contingent on a formal diagnosis, and must be embedded within overall school and system planning.

- **Continuum of Placements**

Inclusive classrooms serve many students well—but not all. For students whose needs cannot be met in a general education setting, access to specialized placements must remain available across the province. Placement decisions should be grounded in individual student needs and supported by provincial investment—ensuring inclusion is purposeful and flexible, not driven by quotas or constrained by limited resources. A coordinated provincial framework can help ensure that all boards maintain a responsive, transparent continuum of placement options.

Short-term, targeted LD/ADHD classes—led by educators with specialist qualifications—have been used in Ontario and other jurisdictions as part of a continuum of supports to provide intensive academic and social skills instruction alongside inclusive classroom participation. These temporary interventions, with clear entry and exit criteria, can strengthen students' readiness to succeed in inclusive settings by reducing frustration, improving self-advocacy, and fostering stronger connections between home and school. Similar approaches include other time-limited, high-intensity supports—sometimes delivered with the aid of

technology to connect students with expert instruction across multiple schools—paired with in-school staff for individualized follow-up.

- **Transitions**

Transitions—whether between grades, schools, or programs—represent critical moments for students with LDs and ADHD. Effective transition planning should be embedded in IEPs, co-developed with families, and supported by dedicated personnel. The adoption and funding of dedicated Transition Facilitators, as recommended in the [K–12 Education Standards Development Committee Final Report](#), would help strengthen continuity and stability across student journeys.

- **IPRC Process**

The Identification, Placement, and Review Committee (IPRC) process remains a critical safeguard for students with learning disabilities and ADHD. Formal identification ensures that a student’s needs are officially recognized and supported through an Individual Education Plan (IEP) grounded in professional assessment. This process provides legal protections, promotes consistency across schools and boards, and helps ensure that programming decisions are based on the student’s documented learning profile rather than short-term staffing or resource constraints.

Reinforcing the value of the IPRC process is essential to safeguarding student rights, maintaining access to specialized placements, and ensuring accountability in the delivery of supports. Without formal identification, students may experience reduced access to services, less consistent review, and fewer opportunities for families to appeal decisions. Provincial leadership is needed to ensure that the IPRC process is upheld as a cornerstone of equitable special education service delivery across Ontario.

- **Staffing and Capacity**

Staffing shortages, unfilled vacancies, and frequent turnover disrupt supports and place added strain on educators—especially during absences or transitions. These disruptions can delay or weaken delivery of accommodations, interventions, and specialized programming for students with LDs and ADHD.

Dedicated provincial funding is needed to stabilize teaching and support roles, ensuring uninterrupted access to required interventions and accommodations. Investment in sustained, job-embedded professional learning should build capacity in evidence-based practices such as structured literacy, differentiated instruction, universal design for learning (UDL), and assistive technology, while also addressing



culturally responsive, trauma-informed, and anti-ableist approaches for students whose needs intersect with other aspects of identity.

Structuring professional learning time early in the school year to focus on reviewing student profiles and updating IEPs can also help ensure that supports are in place from day one. When educators have dedicated time to understand each learner's needs before instruction begins, it strengthens continuity, reduces implementation delays, and improves collaboration between classroom teachers and special education staff.

- **Waitlists and Identification**

Delays in accessing psychoeducational assessments, specialized programming, and intensive interventions remain a major barrier—particularly in high-needs and under-resourced areas. These delays are not merely administrative delays; they result in lost instructional time, increased frustration, and growing academic and emotional challenges for students with LDs and ADHD.

A provincial strategy is needed to expand service capacity and implement scalable identification pathways, including the use of evidence-based screeners, streamlined referral processes, and timely access to qualified assessors.

- **Equity and Transparency**

Students with LDs and ADHD continue to face systemic barriers to accessing high-opportunity programs such as French Immersion and Gifted, as well as specialized supports. These inequities disproportionately affect students from equity-deserving communities, including Black, Indigenous, racialized, and newcomer families. Access challenges are often compounded by systemic bias and deficit-based perceptions—particularly where disability, race, and language intersect.

To address these disparities, individualized and culturally responsive supports must be available across all placements and pathways. Inclusion should be defined not by physical location alone, but by the appropriateness and responsiveness of programming. System leaders at all levels must work together to dismantle participation barriers, uphold student rights, and ensure equitable access to the full range of programs and supports across Ontario.

Ontario must urgently invest in service expansion and scalable identification pathways. This includes evidence-based screeners, streamlined referral processes, and timely access to qualified assessors. Even partial or preliminary data can help educators intervene earlier and more effectively—reducing waitlists, improving outcomes, and

ensuring that no student is left without meaningful support.

## Closing Reflection: Building on Early Momentum

We are encouraged by the Ministry's investments in universal screening and evidence-based reading instruction. These reforms represent important progress—but must be matched with sustained, individualized support throughout each student's learning journey. Without structured intervention, continuous progress monitoring, and accountable transition planning, early screening may yield limited impact and fall short of its transformative potential.

Thank you again for the opportunity to contribute to this review. We would be pleased to provide additional information or context as needed—and remain committed to supporting this critical work in partnership with education stakeholders across the province.



## Appendix A

# OPEN LETTER TO SEACs ACROSS ONTARIO

*From the Learning Disabilities Association of Ontario (LDAO)*

**March 2025**

Dear SEAC Members,

As the 2025–2026 budget season progresses, the Learning Disabilities Association of Ontario (LDAO) extends our sincere thanks for your ongoing commitment to students with exceptionalities. Your work ensures that the voices and needs of students with learning disabilities (LDs), attention-deficit/hyperactivity disorder (ADHD), and related exceptionalities are central to local decision-making across Ontario.

We recognize that boards are working through complex planning processes. As special education models continue to evolve, what remains clear: the specific needs of students with LDs and ADHD have not changed. These students continue to require timely, structured, and individualized supports—delivered through a full continuum of services, including Tier 2 and Tier 3 interventions, access to trained professionals, and accommodations that are matched to cognitive and learning profiles.

## SEAC's Legislated Role: Supporting Student-Centered Planning

Under Regulation 464/97, SEACs are formally mandated to advise on both special education budgeting and planning. The decisions you help shape this spring will directly influence staffing, service delivery, and access to interventions in the year ahead.

To ensure meaningful progress for students with learning disabilities (LDs) and ADHD, we encourage SEAC members to bring forward student-centered and solution-focused questions, such as:

- **Tiered Supports:** How are Tier 2 and Tier 3 interventions being sustained, staffed, and resourced across the board? What systems are in place to ensure timely access to direct, explicit instruction and individualized supports?
- **Continuum of Placements:** What options remain available for students who may require alternative or specialized settings? How are placement decisions being made to ensure alignment with individual learning needs and equitable access to appropriate supports?



- **Transition Planning:** What structured processes are in place to support students with LDs and ADHD as they move between schools, programs, or instructional models? Are individualized transition plans embedded in IEPs and supported by dedicated personnel?
- **Educator Capacity:** What professional learning is being prioritized to build educator capacity in structured literacy, direct and explicit instruction, differentiated instruction, universal design for learning, strategies to support executive functioning, and other evidence-based interventions?
- **Equity of Access:** How are disparities in access to specialized supports across different program pathways and school contexts being addressed? What steps are being taken to ensure students with LDs and ADHD receive consistent, individualized supports regardless of their placement?

As always, your work at the SEAC table ensures that policy and funding decisions reflect real student needs and drive equitable outcomes across the system.

## Building on Momentum: From Early Screening to Sustained Support

We are encouraged by the introduction of early diagnostic assessment and intervention strategies across Ontario, including the Ministry's investments in universal screening and evidence-based reading instruction. These are promising steps forward and align with the recommendations of the [Right to Read](#) inquiry report and its [Year Two Update](#).

To maximize the impact of these early efforts, boards must also plan for sustained, individualized support across the entire student journey. This includes not only Tier 2 and Tier 3 interventions, but also structured transition planning as students move between programs and schools. The [K-12 Education Standards Development Committee Final Report](#) has emphasized the importance of embedding structured, individualized transition planning into IEPs to ensure continuity of supports as students move between schools and programs. The report also calls for dedicated Transition Facilitators to help families and students navigate these changes. Without well-resourced, accountable, and student-informed transition processes, there is a risk of widening learning gaps and disrupting progress for students with LDs and ADHD.

As SEAC members, your role in ensuring that Tier 2 and Tier 3 interventions are protected—and expanded where needed—is critical to achieving true equity for students with exceptionalities.



## A Shared Commitment to Collaborative Advocacy

At LDAO, we see SEACs as essential partners in this work. We are here to support you—whether through policy insights, curated resources, or thought partnership around motions, planning, and provincial trends.

To support your ongoing advocacy, we've included:

- Our two most recent **LDAO SEAC Circulars** (February and April 2025), which highlight provincial priorities such as the Right to Read implementation, mental health supports, special education planning, and structured transition processes.
- A link to our new video resource: [SEAC Motions: A Guide for Effective Systemic Advocacy](#). This short on-demand webcast was developed quickly in response to requests from SEAC representatives. It offers practical guidance on how SEAC motions can influence policy, programming, and funding—along with tips for clarity, collaboration, and effective follow-up. Attached, you'll also find the full transcript of the webcast for your reference or to share with your SEAC colleagues.
- LDAO's **Policy Statement on Educational Inclusion for Students with Learning Disabilities**, which affirms the right of students with LDs to access a continuum of placement options based on their individual needs. This includes alternative settings and individualized supports, where appropriate, to ensure equitable access to learning.

Thank you again for your service, leadership, and dedication to student success. We are proud to support your role in shaping inclusive, accessible, and responsive education systems across Ontario.

In partnership,

**Dr. Steven Reid**  
**President and CEO**

Learning Disabilities Association of Ontario (LDAO)

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## Appendix B

### Auditor General Questions Posed

**Can LDAO provide real life examples/case studies of problems navigating the system, particularly with reference to: student exclusions, challenges to IEP modifications/accommodations not being implemented (not anecdotal, but formally documented)?**

The Learning Disabilities Association of Ontario (LDAO) is deeply aware of the systemic challenges students with learning disabilities (LDs) and attention-deficit/hyperactivity disorder (ADHD) face across the province when navigating Ontario's education system. While we cannot disclose individual student files, we have received consistent and well-documented reports that reflect clear, province-wide patterns. These include:

**Student Exclusions:** Students with LDs and/or ADHD continue to be excluded from learning opportunities—both formally (e.g., suspensions, modified day schedules) and informally (e.g., exclusion due to staffing shortages, perceived behavioural risks, or time allocated for "program development"). These exclusions disproportionately affect students who require consistency, structure, and relationship-based support—further compounding academic and emotional challenges.

**Inconsistent IEP Implementation:** LDAO frequently supports families in understanding their child's Individual Education Plan (IEP), including the distinction between accommodations and modifications, required timelines, and who is responsible for service delivery. Families report that school boards vary significantly in the information provided—often requiring decisions to be made quickly, and with programming shaped by staffing limitations rather than student need. These inconsistencies contribute to inequitable service delivery and erode trust in the process.

Parents frequently report that accommodations are reduced to a limited set of strategies—typically the provision of assistive technology and extra time on assessments. While these supports can be valuable, they often require additional scaffolding to address the full range of student needs and are rarely sufficient on their own. Students with LDs require individualized accommodations that address their specific processing needs, learning profiles, and classroom demands. When accommodations are treated as generic or “one size fits all,” they fall short of supporting meaningful access to the curriculum and may contribute to disengagement, frustration, and underachievement.

### **Missed Opportunities in IEP Continuity**

Each fall, significant time is lost re-establishing supports for students with LDs and ADHD. Despite active IEPs from the previous school year, many students begin September without access to assistive technology, specialized instruction, or learning strategies—delaying critical support.

A more proactive, system-wide approach is urgently needed. This should include a standard, province-wide year-end IEP review that identifies which supports will carry forward, along with transition meetings involving key staff at both the end and start of the school year. These meetings are essential to ensure that programming is understood, coordinated, and ready to implement from day one.

To succeed, this model requires time for educators and support staff to collaborate—and dedicated funding to make that possible. Starting the year with an active, working IEP—updated rather than rebuilt—would honour previous planning, reduce disruption, and protect instructional time for learning, not administrative catch-up.

**Appeals and Advocacy:** Caregivers report major challenges when attempting to navigate the appeals process or advocate effectively for their children. Many families lack a clear understanding of their rights, and report that policies are inconsistently interpreted or poorly communicated by educators. These challenges are especially acute for families from equity-deserving communities, where language, cultural responsiveness, and access to advocacy supports may be limited.

### **Can LDAO speak to student absences due to lack of school support?**

Students with special education needs often experience heightened anxiety and difficulty engaging with unfamiliar staff, which can contribute to chronic absences. The growing frequency of teacher absences and the prevalence of unfilled vacancies further exacerbate these challenges, disrupting the continuity and stability that many students with LDs and ADHD rely on to succeed.

When familiar educators are not available, the integrity and consistency of Individual Education Plans (IEPs) can be significantly compromised. This disruption can lead to a decline in student engagement, increased behavioural challenges, and school refusal—particularly for students who depend on predictable routines and strong relationships. In some instances, families have been informally asked to keep their child at home during staff absences to pre-empt behavioural incidents. This practice—often driven by limited staff training and a lack of coordinated support strategies—represents a systemic failure to uphold students’ rights.

Educators and administrators across the province have made clear that the needs in classrooms are intensifying—and that they are struggling to keep up. At the same time, specialized programs and supports are being reduced or eliminated, leaving students with complex learning needs without the interventions they require to succeed.

These impacts can be compounded for students with LDs at the intersection of ADHD, mental health challenges, and marginalized identities, where systemic bias and barriers to culturally responsive support further heighten the risk of exclusion. This is not just a programming issue—it is a human rights issue. Every student has the right to access education in a way that meets their needs. Excluding students from school due to system capacity constraints is unacceptable. A system-wide commitment to maintaining program fidelity, supporting staff, and ensuring every student can attend school with dignity must be an urgent priority.

**When receiving communications from the Ministry and/or school boards, are parents clear about what their placement options are?**

The communications we receive from caregivers consistently indicate that information about placement options is often confusing, incomplete, and inconsistent. This lack of clarity appears to stem from significant variations in how individual school boards interpret and implement Ministry of Education policy—as well as disparities in funding and staffing that affect whether certain placement options are actually available in practice.

While Ministry guidelines outline a range of placement options for students with exceptionalities, the actual availability of these placements is ultimately determined at the board level. As a result, families across Ontario do not receive uniform information or equitable access to the full continuum of supports. This inconsistency contributes to confusion—and, in many cases, limits a family’s ability to make fully informed decisions about their child’s educational pathway.

Parents also frequently report being pressured to make placement decisions quickly, often without a clear understanding of what the options entail, how and when supports will be implemented, or who will be responsible for delivering them. This rushed process undermines meaningful parental involvement and may result in placements that do not fully meet the child’s needs.

It is important to note that placements which fail to meet student needs are often linked to broader system challenges—such as staffing shortages and inconsistent allocation of special education resources. Even when appropriate placements are identified, the absence of qualified personnel (e.g., educational assistants, special education teachers) can significantly limit the effectiveness of support.

LDAO continues to advocate for greater transparency and consistency in how placement options are communicated, implemented, and resourced across Ontario’s publicly funded education system.

### **What are the benefits of being identified via IPRC?**

Formal identification through the Identification, Placement, and Review Committee (IPRC) process provides students—particularly those with learning disabilities—with critical educational protections, enhanced consistency across school settings, and a stronger foundation for individualized support. Unlike IEPs developed without formal identification, the IPRC process offers legal safeguards and program continuity that help ensure students’ rights and needs remain central throughout their academic journey.

- **Formal Recognition of Needs**

The IPRC process provides official recognition that a student has an exceptionality, such as a learning disability. For LDs, this is based on a diagnosis by a registered psychologist or psychological associate. For other exceptionalities, different professionals may be involved. The resulting student profile helps guide targeted instruction and programming.

- **Access to Tailored Supports and Services**

Once a student is formally identified, they are entitled to an Individual Education Plan (IEP) that includes specific accommodations, modifications, and services—such as assistive technology, access to resource teachers, or specialized programming. These supports are aligned with the student’s documented learning profile, increasing the likelihood that interventions are appropriate, timely, and evidence-based.

- **Legal and Procedural Governance**

The IPRC process is governed by the Education Act and provides families with clear procedural rights—including the right to appeal identification and placement decisions. These safeguards are not guaranteed for students with IEPs who have not been formally identified. As such, the IPRC process strengthens transparency, accountability, and equity in decision-making.

- **Consistency Across Schools and Boards**

IPRC identification helps ensure that a student’s needs are formally recognized—even if they move between schools or school boards. This supports smoother transitions and protects access to appropriate programming throughout the student’s academic journey.



- **Enhanced Advocacy and Collaboration for Caregivers**

Formal identification equips caregivers with clear documentation to support advocacy and engagement. It also encourages collaborative decision-making, bringing together educators and professionals—such as psychologists, speech-language pathologists, and occupational therapists—to co-develop programming and placement decisions within a student-centered framework.

### **Have there been challenges in implementing IEPs in Ontario?**

Yes. While the Individual Education Plan (IEP) remains a foundational tool for supporting students with special education needs, its effective and consistent implementation continues to present significant challenges across Ontario.

**Formal IEPs vs Informal IEPs:** The increasing use of IEPs developed without a formal identification, placement, and review committee (IPRC) process—or without the support of professional assessments—presents major challenges to meaningful parental collaboration, informed decision-making, and access to procedural protections.

Students who are not formally identified as “exceptional pupils” under the Education Act do not have the same legislated rights, including the right to appeal identification or placement decisions. These students may also experience less consistent review and weaker enforcement of timelines, leading to gaps in accountability.

In contrast, when a student is formally identified, school boards are required to develop an IEP within 30 school days, consult with parents or guardians, and conduct regular reviews of placement and programming.

When IEPs are grounded in comprehensive professional assessments, programming can be more accurately aligned with the student’s learning profile. These assessments provide critical insight into a student’s cognitive processing strengths and needs—supporting more precise intervention design and long-term skill development.

When IEPs are developed without that foundation, they often rely solely on educator observation. While teacher insight is valuable, it may not provide a complete picture of where and why learning breakdowns are occurring. This can result in programming that is less accurate, less effective, and harder for families to understand, trust, or advocate around. In many cases, families are unaware their child lacks formal identification—and the accompanying legal protections.

LDAO continues to emphasize the importance of professional assessment and formal identification in guiding meaningful IEP development and ensuring accountability.



**Accommodations and Modifications:** Educators and families often struggle to distinguish between accommodations (which support access to the curriculum) and modifications (which alter the curriculum expectations themselves). This confusion can lead to:

- Misinterpretation of student progress,
- Inaccurate achievement reporting, and
- Unnecessary placement on modified programs, which may affect credit accumulation and post-secondary pathways.

Clarifying the distinction—and ensuring accurate application—is essential to supporting student success and maintaining the integrity of both assessment and programming.

**Delays in the Development and Implementation of IEPs:** Despite the requirement that IEPs be developed within 30 school days, implementation is frequently delayed—particularly during the early weeks of the school year. As a result, students may go weeks without access to the accommodations, assistive technology, or targeted instruction they need. These delays are especially harmful during key transitions, contributing to academic regression, behavioural challenges, and student disengagement.

**Insufficient Professional Learning:** Effective IEP implementation requires ongoing training in areas such as universal design for learning (UDL), differentiated instruction, assistive technology, and trauma-informed practice. Many educators report limited access to job-embedded, sustained professional learning in these areas. Without targeted support, staff may lack the skills and confidence needed to interpret assessment data, adjust programming, or deliver individualized instruction consistently across classrooms.

**Lack of Understanding of IEPs as Living Documents:** IEPs are intended to be dynamic and responsive. In practice, however, they are often treated as static—rarely updated outside of scheduled reporting cycles. Opportunities to revise strategies or expectations based on student progress are frequently missed, leaving students with outdated or ineffective programming.

These challenges contribute to gaps in service delivery, inequitable access to supports, and reduced educational outcomes. Ensuring that IEPs are timely, accurate, collaboratively developed, and consistently implemented must be treated as a system-wide priority.

## Conclusion

We would like to thank you for the opportunity to respond to your questions regarding the special education landscape in Ontario and its impact on students and families. This

review is both timely and necessary, reflecting widespread and growing concern across the province.

Your questions bring critical focus to persistent system-level challenges—including inequities in access, lack of clarity in placement decisions, student exclusions, delays in assessment, and the need for programming that is transparent, evidence-based, and responsive. At the same time, they underscore the importance of centring the lived experiences of students and families—not only academically, but emotionally and socially as well.

We also acknowledge and appreciate the Ministry’s ongoing work to strengthen inclusive education through [Policy/Program Memorandum 168: Reading Instruction and Early Reading Screening](#) and the [K-12 Education Standards Development Committee Final Report](#). The key challenge facing special education policy and program delivery in Ontario is not the absence of sound policy or legislative frameworks, but rather the need for consistent, well-resourced, and accountable implementation across the province. Addressing systemic barriers—including ableism in policy, practice, and perception—is essential to ensuring that students with LDs and ADHD are not only included, but equitably supported to thrive. Doing so is not only an educational priority, but a fundamental human right.

The Learning Disabilities Association of Ontario remains committed to advocating for a full continuum of placements, individualized supports, and accountable implementation that reflects the diverse and evolving needs of students with learning disabilities and attention-deficit/hyperactivity disorder. We believe every student has the right to access timely, equitable, and evidence-informed programs and services. We look forward to contributing to future solutions that help make this vision a consistent reality across Ontario’s publicly funded education system.