



Auditor General's Report – December 10 2013 – Private Education – Pages 180 - 200

In analyzing this report for the Ontario Federation of Independent Schools, information has been summarized and organized in order to be addressed by the association to the media, to the government and to its members. It will help us organize future membership criteria as well as influence the government to be more consistent in its adjudication of current legislation as well as demonstrate an acceptance of public accountability measures that are appropriate.

General Comments – Report Preamble

*The **objectives** of our audit were to assess whether the Ministry had adequate procedures in place to:

a) **assess the effectiveness of private schools in providing satisfactory instruction** and b) **ensure compliance with the Education Act and related ministry policies.**

OFIS Statement – OFIS would be interested in the definition of “satisfactory instruction” and maintains that tuition-paying parents are a powerful regulator in determining the effectiveness of private schools

*“The Ministry does not provide any funding but, given that publicly funded education exceeds \$10,000 per student per year, private schools in effect either **save the taxpayers** over \$1 billion annually or enable the Ministry to allocate this amount to other education priorities. (pg. 180)”

OFIS Statement – Private schools save the government more than \$1 billion annually. Graduates of Ontario’s private schools go on to become successful college and university students who become contributing, productive members of society and make a lie of the notion that parents can’t choose properly for their children’s educations.

*“The Ministry will take appropriate steps to expand initiatives to provide information regarding consumer awareness about the private school sector.” (pg. 184)

OFIS Statement – MOE SHOULD better use the information they have to better report to the public about the profile and activities of registered private schools. That information should be easily accessible to the public through online directories

“A strong private school system can benefit the taxpayers as well as both public and private school students.” (pg. 180)

OFIS Statement – This bears out in 6 Canadian provinces, 37 American States and more than half the countries in the western world. Ontario is a lone hold-out in both its support and oversight of private school education and true parental choice.

Background Information To The Report (pg.181)

- we did not include audit visits to private schools in the scope of our audit because they are not provincial grant recipients. (didn’t look at elementary schools that may have files at MOE – complaint based or otherwise)

-we researched private school oversight practices in other jurisdictions

-we solicited opinions of universities

-we solicited opinions of Ontario Universities’ Application Centre

-we solicited opinions of Ontario College Application Service

-we consulted several private school associations (OACS, OFIS, CIS)

“All private schools are to be **registered** with the Ministry of Education” (Ministry) (pg. 180)

OFIS Statement – Ontario Private Schools’ Coordinator, Tony DiLena, recently asked OFIS to correct/retract a statement in its recent news release on the proposed legislation to modernize child care legislation in the province. He was emphatic that private schools only file a notice and are not registered. This report from the auditor-general uses the word “registered” throughout the report. As such, no such retraction will happen. MOE must accept the full responsibility for the private schools it registers and cannot continue to publicly state that the schools are unknown to them.

What MOE Isn't Doing According To Auditor-General's Report:

OFIS has made a list of all the instances in the report where MOE has been found negligent in its current oversight of private schools under current legislation and policies. That negligence perpetuates the instability of the private school sector publicly. Further, it paints all private schools with the same brush since it does not take responsibility for dealing with private schools and agencies that are functioning illegally. Italics after each citation of negligence are OFIS' editorial comments.

- 1) "According to ministry information, there may be more than 15,000 children in private schools below compulsory **school age**, with as many as 3,000 below the age for junior kindergarten."(pg. 182) *(Media consistently reporting that MOE has no idea who is doing what and where. From this report, it seems apparent that they know very well)*
2. "During validation visits the Ministry does not evaluate the curriculum for either quality or content."(Pg. 182) *(although they are supposed to check that a program is in place)*
3. "Does not check for any health and safety issues, or have a process in place to inform other oversight agencies of any concerns observed." (pg. 182) *(Private Schools Coordinator has been telling us for years that they do report to local health & safety authorities because they can't take action themselves within current legislation).*
4. "Inspectors informed us that they did not have sufficient time to perform these supplementary procedures (to guarantee credits)."(pg.183) *(For the amount of money being charged for inspections, inspectors should be doing ALL procedures and have copious documentation for all of it).*
5. "Ministry has no process in place to verify its (OnSIS) accuracy and relies on the good faith of private school administrators." (Pg. 183) *(MOE relies on the good faith of ALL school administrators in OnSIS reporting, not just private schools)*
6. "Ministry has not done any such analysis of OnSIS reporting for private school students (quality & satisfaction of program)." (Pg. 183) *(MOE has collected all the information and should analyze it and provide feedback publicly)*
7. "Education officers do not have access to OnSIS information and therefore cannot identify and follow up on such discrepancies. (pg. 186)" *(How can education officers do inspections without comparing NOI and OnSIS submissions?)*
8. "MOE reconciles public schools' requests for diplomas to grade 12 student enrolments. However, this procedure has not been applied to private schools."(pg.183) *(Why wouldn't they do so to protect the integrity of the credits and OSSD's? They have all the information from NOI & OnSIS and inspection reports).*
9. "Over the past three years, the Ministry has received notices (NOI) from 275 prospective private schools and has registered 190. The Ministry has not tracked the reasons for which the remaining 85 were not registered." (Pg. 183) *(Why wouldn't they keep records on failed notifications? Knowing the people who make those filings and the reasons the filings were denied would prevent fraud and illegal advertising of private school activities, thereby protecting the integrity of the whole sector.)*
10. "Inspectors doing NOI validation visits generally do not retain supporting documentation from their visits or record their procedures." (pg. 184) *(Even OFIS requires supporting documentation to its membership application process to ensure the validity of the application. If the government is registering a private school and it's a validation visit, they should be able to demonstrate the validation to anyone who asks)*
11. "Although the Ministry sends letters to private schools that have closed informing them of this obligation (to return OSR records to MOE), it does not perform any additional follow-up if the closed school does not forward student files or does not respond to the letter." (pg. 188) *(These records belong to MOE and they have very strict rules for how they are to be used to ensure the integrity of them. They should protect their own records and ensure the fulfillment of their obligation to every student in the province's education)*
12. "MOE does not have procedures in place to proactively identify private schools that are operating illegally." (pg. 188) *(This ends up painting all private schools with the same brush – there will always be some who ruin it for all which is the best argument for MOE to do its current job more effectively – they have an obligation to all children in the province and to private schools that have a legislated right to exist versus those that don't)*

13. “All the regions stated that they used the risk management criteria to determine priority schools for more frequent inspections, only one of these regions had documented its assessments.” (pg. 192) *(This is supposed to be part of the process to guarantee credit integrity and these inspections are important to private schools’ reputation. They would have no written proof of a school’s progress or success with credits being issued. Schools that are paying for this inspection process to ensure their credit issuing integrity have a right to expect more documentation.)*
14. “Many of the inspection files we selected did not include supporting documentation or note the activities performed in order for us to assess whether education officers were following consistent inspection procedures based on the risks identified.” (Pg. 192) *(MOE simply cannot make statements about the integrity of private school credits without consistent, accurate, comprehensive files. They certainly should not be allowed to charge the current high costs of inspections without a guarantee for the credits based on documented evidence.)*
15. “Although education officers in the regions we visited stated that they review 10 OSRs during an inspection, in the majority of the inspection files we selected we were unable to confirm this as there was no record of this review and the OSR checklists were not on file.” (Pg. 192) *(Based on the auditor-general’s report, every private school issuing credits should seriously question its inspection process and should demand to see the full file, complete with all supporting documentation required, before paying the exorbitant fees demanded. Furthermore, the government should be able to accredit these schools with confidence, if they follow-through consistently with the inspection process and all its supplementary procedures.)*
16. “There is limited management oversight over the follow-up of compliance issues identified during an inspection.” (pg. 195) *(No records or documents are kept on issues for follow-up which means officers must rely on their own memories with respect to follow-up on compliance issues.)*
17. “The Ministry informed us that it has not sought prosecution for any offence committed by any private schools or individuals associated with these schools for any violations perceived by Section 16 of The Education Act (because the fines cannot be assessed except upon conviction.” (pg. 200) *(When MOE does not follow through on its own legislation, it further erodes the integrity of the many good private schools abiding by all of the rules and providing good services to families and it provides even less confidence to the public than it could.)*
18. “MOE does not have processes in place, such as an analysis of EQAO test results, to assess whether private school students are acquiring the required skills and knowledge. Furthermore, since EQAO testing is not mandatory, such analysis cannot be undertaken for the private school sector as a whole. We noted that such testing, while often paid for by the province, is mandatory for private schools in several other Canadian jurisdictions, such as British Columbia, Alberta, Saskatchewan, Manitoba, and Newfoundland and Labrador.” (pg. 201) *(While many public accountability questions could be resolved by greater consistency in current MOE oversight requirements, increasing oversight would have to accompany government support for private schools, something this current government has been emphatic it will never do.*

Questions Generated By This Report:

Question #1 – Early Learning - “The Ministry allows private schools registered before June 1993 to operate child-care facilities without a day nursery licence” – *private schools with early learning programs are a known entity to MOE and NOI contains information on student age groups – there is a big difference between an unlicensed day care and a private school with an early learning program and yet they are all lumped into one category for oversight (pg.182)*

Question #2 – Early Learning - “Any facility that cares for more than five children under the age of 10 who are not of common parentage must be licensed by the Ministry under the *Day Nurseries Act*. The *Day Nurseries Act* also states that a day nursery is not a private school as defined in the *Education Act*, which defines a private school as an institution at which instruction is provided to five or more pupils who are of compulsory school age (age 6) – *There is overlap in the age groups here – DNA takes responsibility for more than 5 children under the age of 10, Education Act takes responsibility for all children 6 and older. Neither Act has taken responsibility for JK and K programs and children. The result is confusion for private schools offering early learning programs – which ministry takes precedence and when? And why is the safety of JK and K children not of equal concern? There needs to be a very clear distinction between unlicensed day cares and private schools with early learning programs.*

Question #3 – Credits/Inspections - “was brought to the Ministry’s attention that some private schools were issuing students higher grades than earned or giving credit for courses that students had not attended.” (pg. 182)

(Who brought these concerns and where is the actual proof of this? Sounds like hearsay in an auditor's report – did the findings actually bear this out?)

Question #4 – Credits/Inspections – “there was limited rationale on file as to why the schools were recommended for more frequent inspection. Nevertheless, approximately 100 schools were identified to be inspected again the following year rather than in two years’ time, and five schools were recommended to be inspected twice annually. In other words, significant concerns were identified in over 25% of the schools offering high school credits (pg. 191) – *How can we be sure of repeat inspections when there was “limited rationale on file” for those recommendations?*

***Question #5 – Inspections** – “To oversee the private school sector, the Ministry spends approximately \$225,000 for head office staff and approximately \$575,000 for education officers....\$2,450 in 2012/13, and the Ministry plans to increase the fee to \$4,050 over the next few years to recover the full cost of each year’s inspections by 2014/15.” For the 2011/12 school year, the Ministry charged private schools approximately \$425,000 for inspections... (pg. 195-196) – *There are 408 private secondary schools (pg. 182 fig. 1) X \$4050 (inspection costs) = \$1,652,400. MOE says it spends \$800,000 (575,000 education officers + \$225,000 head office staff). This is a disparity of \$852,400! MOE collects more than double of what the inspections cost – not cost-recovery basis at all!!!*

Question #6 – Diplomas - “To help prevent diploma fraud and ensure control over blank diplomas pre-signed by the Minister of Education, the Ministry reconciles public schools’ requests for diplomas to grade 12 student enrolments. However, this procedure has not been applied to private schools.” (pg.183). “To help prevent diploma fraud and ensure control over the number of blank diplomas provided, any public school request in excess of 10% above the previous year’s grade 12 student enrolment is rejected. However, this procedure has not been applied to private schools.” (pg. 198). – *Why wouldn’t MOE reconcile private school data in the same way? They have access to all NOI and OnSIS data regardless of whether they choose to use it - 408 secondary schools granting credits (chart on pg. 181) (408 divided by 1500 = 3.6, rounds to 4 extra diplomas per school on average)*

Question #7 – Diplomas – “The purpose of inspections is to determine whether the standard of instruction in courses leading to the OSSD is being delivered in compliance with ministry requirements, including the provincial curriculum.” (pg. 190) – *Why are private secondary schools inspected when public school counterparts are not? Why can they not say they are accredited when they pay for inspection that is for the stated purpose?*

Question #8 – Teacher Certification – “Our review of practices in other jurisdictions found that many provinces (Quebec, Nova Scotia, Newfoundland and Labrador, Prince Edward Island, Saskatchewan require teachers who deliver provincial curriculums at private schools to be *certified teachers*.” (pg. 192) – *Teacher certification does not equal OCT/OTC – there are other certifications worldwide.*

Question #9 – Legislative Enforcement – “In contrast to private school fines, penalties for non-compliance by private career colleges in Ontario can be significant. The *Private Career Colleges Act* outlines that the purpose of penalties is to encourage compliance with that act and with orders to restrain from contravening the act, and to prevent a person from deriving any economic benefit as a result of a contravention of the act.” (Pg. 199) – *Why doesn’t Ontario have a comprehensive Private School Act with similar parameters to the Private Career Colleges Act? It would clarify all of the expectations and give greater public accountability and heighten consumer awareness in a climate where government support is absent.*

Auditor-General Recommendations – The Auditor-General makes a number of recommendations throughout the report on oversight of private education. They are all noted here. OFIS would have basic agreement with all of them. OFIS is also somewhat shocked by the number of matters where MOE is negligent in its oversight of private schools considering the relevant section of the education act is so short. OFIS would also revise its membership application process to reflect the auditor-general’s report thereby providing better information to the public about its members.

Each recommendation is followed by MOE’s response to the recommendations. There is some assurance of improvement but there is no commitment to important measures that would provide greater public accountability, particularly with respect to elementary private schools.

Auditor-General Recommendation #1 - To help ensure that private school students receive satisfactory instruction

in a safe and healthy environment and to ensure compliance with ministry policy and legislation, the Ministry of Education (Ministry) should:

- enhance the notice of intention and validation processes to require private schools to demonstrate that their students are receiving satisfactory instruction (meeting standards of Ontario curriculum)
- notify the appropriate authorities of any health and safety concerns observed during onsite school visits (they already do as we've been notified by Private Schools Coordinator)
- revalidate private schools annually or on a cyclical basis to ensure that information provided is correct and to revoke the authority to operate for those schools that do not meet the definition of and general requirements of a private school
- provide education officers with access to the Ontario School Information System to, for example, reconcile and validate enrolment (and graduation numbers)
- identify all private school locations and verify that all locations comply with ministry policy and legislation
- ensure that closed schools forward all student records to the Ministry as required
- develop a process to proactively identify schools that are not complying with the advertising guidelines or are operating illegally without being registered.

Ministry Response -

The Ministry agrees that students should receive instruction in a **safe and healthy environment**, and will assess options to ensure that **private schools with credit-granting authority** document compliance with provincial health and safety legislation, and options to empower education officers to notify the appropriate authorities of any suspected violations of health and safety laws.

The Ministry will continue to **expand and refine the collection and analysis of data** received from private schools through the annual *Notice of Intention to Operate a Private School* form, and the use of this information during the validation and inspection processes. The form has been updated for the current 2013/2014 school year, requiring private schools to provide information regarding any educational programs being operated at "campus" locations other than the main school site. This is part of the Ministry's policy to eliminate the operation of campus locations by private schools with credit-granting authority, effective September 2014. In addition, the Ministry has directed education officers to inspect any additional locations of private schools with credit-granting authority identified through this form.

The Ministry is **working to develop a profile for each private school with credit-granting authority** in Ontario, as a tool to provide education officers conducting inspections with data collected through the Ontario School Information System.

The Ministry maintains a list on its public website of all private schools currently operating in Ontario, including information regarding a school's credit-granting authority. The Ministry will review the public website content with a view to increasing consumer awareness and will continue to **take appropriate steps to expand initiatives to provide information to parents and students regarding the choice to pursue private education.**

Auditor-General Recommendation #2 - To reduce health and safety risks to preschool children and ensure compliance with legislation, the Ministry of Education (Ministry) should identify all private schools that operate child-care facilities and ensure that these schools are licensed under the *Day Nurseries Act* and inspected as required by legislation.

Ministry Response

As part of its work on modernizing child care, the Ministry is planning a policy change to direct that all private schools serving children under junior kindergarten age must be licensed under the *Day Nurseries Act*. The Ministry also intends to introduce new legislation that, if passed, would replace the *Day Nurseries Act*. The proposed bill would clearly outline **which programs require a child-care licence and which are exempt**, including **provisions supporting the direction that private schools serving children under junior kindergarten age require a child-care licence**. This would be supported by communications to all private schools in Ontario and a transition period for operators to become licensed.

The Ministry will continue assessing options to identify private schools offering services that should be licensed under the *Day Nurseries Act*, and **withdrawing the policy exemption** from the *Day Nurseries Act* for private schools offering services to children under junior kindergarten age. The Ministry will also continue its practice of

investigating complaints regarding private schools offering services that may need a licence under the *Day Nurseries Act*, and identifying such schools from information received through the annual *Notice of Intention to Operate a Private School* form.

Auditor-General Recommendation #3 - To ensure that adequate policies and procedures are in place to verify that credit-granting private schools are awarding course credits and diplomas in compliance with ministry policies, including the provincial grade 9 to 12 curriculum, the Ministry of Education (Ministry) should:

- use its established criteria to assess the risk of non-compliance so that it can rank all credit-granting schools and devise an inspection frequency schedule according to the risks identified;
- document procedures undertaken, significant non-compliance observed and conclusions reached during inspections, and retain all documentation for management oversight and subsequent review
- consider a conditional rating for new private schools that are not yet fully compliant;
- review whether the "P" notation on public school student transcripts is influencing post-secondary admission decisions as intended
- establish effective procedures to identify, track and take timely corrective action against private schools that are repeatedly non-compliant with ministry policies.

Ministry Response

The Ministry agrees that the **protection of credit integrity** in the granting of credits and diplomas is a critical function of the private school inspection process, and will continue to review and assess policies and procedures in this area. The Ministry has implemented a risk-based procedure to identify priority schools requiring early inspection, and continues to determine the frequency of inspections through the inspection process. The Ministry is reviewing the documentation, tracking and follow-up aspects of the inspection process to look for ways to **improve the effectiveness of its monitoring activities**.

The Ministry will **evaluate options** regarding private schools that are persistently non-compliant with legislative and policy requirements.

Auditor-General Recommendation #4 - To help ensure that sufficient information is submitted to enable effective oversight of the private school sector and to ensure compliance with legislation and related policies, the Ministry of Education (Ministry) should:

- consider various options to encourage private schools to submit the required information on a timely basis;
- implement procedures to periodically verify the accuracy of the data submitted by private schools;
- analyze data received to highlight potential concerns and to determine if private school students are progressing appropriately; and
- consider assigning Ontario Education Numbers to all private school students to help verify compulsory school attendance.

Ministry Response -

The Ministry agrees that the **collection of timely and accurate information** is required for effective oversight and monitoring, as well as for evidence-based decision-making and policy development, and will continue working to improve processes for **data collection and analysis**. The Ministry will continue to provide resource materials, help-desk support and training to assist private schools in completing their required submissions. The Ministry will **extend the data quality assurance processes in place for publicly funded schools to the data collected from private schools**. This five-pillar approach includes **consistency, completeness, accuracy, precision and timeliness**. The Ministry will use the **private school profile under development** and conduct trend analysis to track achievement for students attending private schools and their progress through the education system, including comparisons to other private-school and public-school peers across the province.

The *Notice of Intention to Operate a Private School* form has been updated for the current 2013/2014 school year to require private schools to declare whether or not they have provided the statistical information required by the *Education Act*, noting that failure to do so may result in a fine upon conviction and the revocation of the ministry-issued school identification number required to operate.

The Ministry will also consider options regarding the issuance of **Ontario Education Numbers to all private school** students. This number is currently issued to all students in publicly funded schools and private schools with credit-

granting authority, and to students in private schools that do not grant credits but choose to issue Ontario Education Numbers. The Ministry will inform those private schools not currently issuing Ontario Education Numbers of the **process to apply for access to the online Ontario Education Number application**.

Auditor-General Recommendation #5 - To help ensure that Ontario secondary school diplomas and Ontario scholar certificates are issued only when they are earned and that adequate controls are in place over their distribution, the Ministry of Education (Ministry) should:

- reconcile the number of diplomas and certificates requested to the number of graduating students reported at each private school, and investigate any unreasonable discrepancies
- distribute diplomas and certificates to only those private schools that submit student-specific data (OnSIS) for graduating students.

Ministry Response -

The Ministry agrees that **proper restrictions** are required for ministry documents certifying student achievement and will continue with two recent policy initiatives to tighten control. The first policy, already in effect, is to **reject and investigate orders for diplomas and certificates from private schools with more than 5% above their reported grade 12 enrolments**. The second policy, which will begin in the 2014/2015 school year, is to **not send diplomas and certificates automatically to private schools with credit-granting authority if they have not submitted the required statistical data**. Instead, the Ministry will investigate and determine the appropriate follow-up action, which may include an adjustment or even denial of the school's request.

The Ministry is also **developing a private school profile document** to provide education officers with current, school-specific information from OnSIS, including a comparison of the number of graduates with the number of diplomas and certificates ordered.

Auditor-General Recommendation #6 - To better ensure compliance with the *Education Act* and policies related to private schools, the Ministry of Education (Ministry) should **consider a legislative framework** that would provide more flexible and cost-effective enforcement tools that are commensurate with the nature and extent of non-compliance.

Ministry Response -

The Ministry will continue to take appropriate steps to **expand initiatives to provide information to parents and students regarding consumer awareness in the private school sector**. Regarding issues of enforcement, the assessment of options will be commensurate with the Ministry's definition of its role in this sector, and will in turn **recognize the differences between the role taken by Ontario's Ministry of Education and that of education ministries in other provinces**.

Auditor-General Recommendation #7 - To help ensure that private school students receive satisfactory instruction and are provided with the opportunity to realize their potential and develop into highly skilled, knowledgeable citizens, the Ministry of Education (Ministry) should:

- consider options to increase private school participation in standardized testing
- analyze test results for private school students and follow up on any outcomes that suggest these students are not receiving a quality education.

Ministry Response -

The Ministry will **assess options to require private schools with credit-granting authority to participate in the grade 9 assessment of mathematics conducted by the Education Quality and Accountability Office**. The Ministry will explore options to **develop data collection processes and will analyze private school pass rates for the Ontario Secondary School Literacy Test** annually to identify issues related to private school student achievement and to determine appropriate responses.

OFIS Conclusions:

1. MOE is currently not monitoring or reporting its oversight with private schools in several key areas which would improve information provided to the public and protects the integrity of private schools that are doing a good job. MOE has established seven general requirements for private schools but has no process by which to document or ensure the validity of those requirements on an ongoing basis (pg. 184). OFIS collects information around these seven general requirements during its annual application process and reports on them through its website which is updated regularly. OFIS also follows up on complaints received by the public about the inaccuracy of that reported information with member schools:

- a) control over the content of the program or courses of study
- b) control of the quality of instruction and evaluation of student achievement
- c) a principal in charge of the school
- d) a common school-wide evaluation policy
- e) a common procedure for reporting to parents
- f) a common school-wide attendance policy
- g) a central office to maintain student records.

2. MOE is not performing inspections for private schools issuing OSSD credits with any kind of consistency with respect to procedures and supporting documentation. The high costs of these inspections, which their public school counterparts do not endure, are now highly suspect as a result of the auditor-general's findings. MOE, in its sloppy inspections protocols, inconsistently executed, is actually tarnishing the integrity of very good private schools as a result. "Education officers did not sufficiently document their inspection activities and decision-making. As a result, we could not assess how well education officers were complying with the Ministry's requirements." (pg. 192). "In many of the inspections we sampled there was insufficient evidence that inspectors had implemented these procedures satisfactorily." (pg. 193). "We noted that there is limited management oversight over the follow-up of compliance issues identified during an inspection." (pg. 195). For the cost of these inspections, with no ability to claim any kind of ministry endorsement or accreditation and for the fact that these inspections now cast a disparaging view of the integrity of private schools issuing credits towards the OSSD, OFIS should demand far more reporting and proof on behalf of its members as well as insist upon appropriate accreditation rights for those who pass the protocol and pay the exorbitant fees.

3. In its response to Recommendation #7, MOE will only pledge to increase options and analysis of learning outcomes in private schools issuing credits which leaves all private elementary schools in its current situation where MOE is not fulfilling current oversight and reporting requirements which would further the public accountability craved by parents. It will not pay for or provide processes, such as an analysis of EQAO test results, to assess whether private school students are giving students the required skills and knowledge. "Since it will not provide EQAO testing to private schools, such analysis cannot be undertaken for the private school sector as a whole. Such testing is paid for by the province, and mandatory for private schools in several other Canadian jurisdictions, such as British Columbia, Alberta, Saskatchewan, Manitoba, and Newfoundland and Labrador (pg. 201)." There is a sense here that the government interprets Section 16 of The Education Act in a minimalist manner in order to have private schools be viewed unfavourably in the public eye, thereby ensuring public education as a monopoly in the province. Clearly, anything construed as government support for private schools will not be considered by this current government even if parents choose something alternative to public schools and that further oversight could solidify those parent's choices. All of this means private schools' public image problems will persist.