

PUPIL ACCOMMODATION REVIEW POLICY 2313

1. Rationale

The Simcoe County District School Board's (SCDSB) mission, to inspire and empower learning for life, and vision, a community of learners achieving full potential, provides direction for the board's strategic plan.

The SCDSB recognizes the important role that school facilities have in achieving its mission, vision and values. Factors such as changing demographic conditions, facility conditions, partnership opportunities, and the Ministry of Education funding model, affect the ability of the board to operate and maintain its schools effectively and efficiently to support student achievement. A review of these factors may result in the need to develop alternative solutions to student accommodation.

The Pupil Accommodation Review Policy fulfills the requirements of the Ministry of Education Pupil Accommodation Review Guideline (March 2015) and is consistent with the Community Planning and Partnerships Guideline (March 2015). This policy applies to schools offering elementary and secondary day-school programs and focuses on student well-being; academic achievement; and, school board financial viability/sustainability.

2. Policy

It is the policy of the SCDSB to provide a comprehensive range of educational opportunities equitably distributed across a broad and diverse geographical area through sustainable community schools.

It is the policy of the SCDSB to support the achievement of students through the operation of schools in an effective, efficient and economical manner.

It is the policy of the SCDSB to have a transparent accommodation review process, to encourage the sharing of relevant information, and to provide opportunities for the public and school communities to be heard.

3. Definitions

3.1 Accommodation Review - a process, as outlined in this policy, to undertake a review to determine the future of a school or group of schools. The Accommodation Review process is utilized when a school closure or consolidation is considered.

3.2 Accommodation review area - the combined attendance areas of the group of schools involved in an accommodation review.

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- 3.3 Accommodation Review Committee (ARC) - a committee that represents the affected school(s) of an accommodation review and which acts as the official conduit for information shared between the school board and the affected school communities.
- 3.4 Accommodation Review Committee working meeting - a meeting of ARC members to discuss an accommodation review, and includes a meeting held by the ARC to solicit feedback from the affected school communities of an accommodation review.
- 3.5 Attendance area - the area enclosed within a school's attendance boundary. A school accommodates the students who live within its attendance area. If a district or county program(s) is also located in the school, then students registered in that program may live outside the school's attendance area. The board's policy regarding school attendance areas are detailed in Policy 2317 – School Attendance Areas.
- 3.6 Business day - a calendar day that is not a weekend or statutory holiday. It does not include calendar days that fall within the Christmas, spring, and summer breaks as approved by the board. For schools with a modified school calendar, any break that is five calendar days or longer is not a business day.
- 3.7 Closure - the cessation of the use of part or all of a school building for instructional purposes for students of the board.
- 3.8 Consolidation - the reorganization of students into one or more neighbouring school(s), and/or into a new school(s).
- 3.9 Consultation - the sharing of relevant information as well as providing the opportunity for municipalities and other community partners, the public and affected school communities to be heard.
- 3.10 Facility Condition Index (FCI) - a building condition as determined by the Ministry of Education by calculating the ratio between the five-year renewal needs and the replacement value for each facility.
- 3.11 On-The-Ground (OTG) Capacity - the capacity of the school as determined by the Ministry of Education by loading all instructional spaces within the facility to current Ministry standards for class size requirements and room area.
- 3.12 Parent/guardian - a parent/guardian of an elementary school student or secondary school student who is a minor and who is enrolled in a SCDSB school as a pupil of the board.

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- 3.13 Public delegation - a meeting of the Board of Trustees where groups or individuals can present and have their concerns heard directly by the school board trustees.
- 3.14 Public meeting - an open meeting held by the school board to solicit broader community feedback on a pupil accommodation review.
- 3.15 School Information Profile (SIP) - an orientation document with point-in-time data for each of the schools under review to help the ARC and the community understand the context surrounding the decision to include the specific school(s) in an Accommodation Review.
- 3.16 Terms of Reference - the framework in which an Accommodation Review Committee conducts an accommodation review and encompasses, but is not limited to, the ARC's mandate, governance, and responsibilities.

4. Guidelines

- 4.1 Establishment of an Accommodation Review
 - 4.1.1 The SCDSB examines long-term enrolment projections, school utilization, facility condition, effective program delivery, and opportunities for partnerships with other organizations through the annual Capital Plan. The Capital Plan may recommend changes to attendance areas, the construction of new schools, additions to existing schools, the renewal/upgrading of facilities, the use of portables, partnership opportunities, or indicate that an accommodation review may be required.
 - 4.1.2 The requirement of an accommodation review will be identified within the annual Capital Plan. The Capital Plan shall be posted on the board website upon Board of Trustee approval. Subsequent to the approval of the annual Capital Plan with the requirement of an accommodation review identified, an initial staff report shall be brought forward to the Board of Trustees. The initial staff report will include a recommendation to commence an accommodation review and must include the following:
 - 4.1.2.1 identification of a group of schools recommended for review. Wherever possible schools should only be subject to an accommodation review once in a five-year period unless there are exceptional circumstances as deemed by the board;
 - 4.1.2.2 a summary of actions to address accommodation issue(s) prior to recommending an accommodation review along with supporting rationale of any actions taken or not taken;

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- 4.1.2.3 a summary of accommodation issues for the schools under review;
 - 4.1.2.4 one or more accommodation options with supporting rationale. If there is more than one option, a recommended option is required;
 - 4.1.2.5 where students would be accommodated;
 - 4.1.2.6 proposed alterations to existing facilities or new construction required as a result of the accommodation review;
 - 4.1.2.7 program changes resulting from the recommended accommodation option;
 - 4.1.2.8 impacts upon student transportation;
 - 4.1.2.9 funding source for any capital investment required to support the recommended option, as well as a proposal on how students would be accommodated if funding does not become available;
 - 4.1.2.10 any relevant information obtained from municipalities and other community partners, including any potential partners that confirmed interest in using any underutilized space, in accordance with Policy 2345 – Community Planning and Partnerships; and,
 - 4.1.2.11 a timeline for implementation of the recommended accommodation option.
- 4.1.3 Once the Board has made a decision to undertake an accommodation review the board shall create a dedicated website for the accommodation review, post the relevant section(s) of the Capital Plan and initial staff report, and maintain and update the website as additional information is provided.
- 4.2 Accommodation Review Committee (ARC)
- 4.2.1 Following Board approval to undertake an accommodation review, the school council and student council from each affected school will appoint representatives for the school community:
 - 4.2.1.1 two parents/guardians from each affected school. The representatives must be parents/guardians of students that attend the affected school and reside in the attendance area of the affected school; and,
 - 4.2.1.2 two student representatives from each affected secondary school. Student representatives must attend the affected secondary school and reside in the attendance area of the affected secondary school.

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- 4.2.2 The Director of Education will approve the ARC membership.
- 4.2.3 The ARC will be chaired by the Director of Education or designate.
- 4.2.4 Where any person appointed to the ARC is unable or unwilling to participate in the work of the ARC, the ARC shall continue to perform its duties under this policy despite the absence of that member(s), and no act or duty performed by the ARC shall be deemed invalid by reason only of absence of the member(s).
- 4.2.5 The board will support the ARC with resources, to assist the committee in its work.
 - 4.2.5.1 Resources may include:
 - 4.2.5.1.1 the local trustee(s);
 - 4.2.5.1.2 the superintendent(s) of education K-12;
 - 4.2.5.1.3 administrative support staff;
 - 4.2.5.1.4 principal and/or vice-principal of the affected school(s);
 - 4.2.5.1.5 planning, enrolment and community use staff;
 - 4.2.5.1.6 design and construction staff;
 - 4.2.5.1.7 program staff; and,
 - 4.2.5.1.8 business/finance staff.
 - 4.2.5.2 Staff will provide a Terms of Reference (attached as APPENDIX A) indicating the mandate, roles and responsibilities, and procedures of the ARC.
- 4.2.6 Formation and Dissolution
 - 4.2.6.1 Following Board approval to undertake an accommodation review, the ARC will officially form at the ARC orientation session and prior to the first public meeting. At the orientation session board staff will describe the mandate, roles and responsibilities, and procedures of the ARC.
 - 4.2.6.2 The ARC is disbanded after the final public meeting.
- 4.3 Municipal and Public Agency Consultation
 - 4.3.1 The Community Planning and Partnerships (CPP) Guidelines were introduced to encourage schools boards and community organizations to share planning information, with the goal to optimize the use of public assets to benefit school boards, students and the community. Board staff will, in accordance with Policy 2345 – Community Planning and Partnerships, consult with community organizations with the intent to:
 - 4.3.1.1 reduce facility operating costs for the school board and government;
 - 4.3.1.2 improve services and support systems available to students;
 - 4.3.1.3 strengthen relationships between the school board, community partners, and the public;

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- 4.3.1.4 maximize the use of public infrastructure through increased flexibility and utilization; and,
 - 4.3.1.5 provide a foundation for improved service delivery for communities.
 - 4.3.2 Within five business days of the Board approval to undertake an accommodation review, board staff will invite the following organizations to a meeting to discuss and comment on the recommended option(s) outlined in the initial staff report:
 - 4.3.2.1 affected single, lower, upper-tier municipalities and First Nation, Métis, Inuit councils (through written notice to the Clerk's Department or equivalent); and,
 - 4.3.2.2 other community partners identified in Policy 2345 – Community Planning and Partnerships that expressed interest prior to the approval of the accommodation review.
 - 4.3.3 The above noted municipalities and community partners must provide their feedback on the recommended option in the initial staff report before the final public meeting. A response deadline will be provided in the meeting invitation.
 - 4.3.4 Technical information requested of the local municipality will include, at a minimum, designated growth areas and plans; building permit activity; population and demographic data; development projections; recreation and park planning; and, a long term capital planning summary.
 - 4.3.5 The school board will document efforts to meet with the above noted municipalities and community partners and provide all relevant information from this consultation in the community consultation section of the final report to the Board.
- 4.4 Public Consultation Process
- 4.4.1 Board staff shall facilitate a minimum of two public meetings for broader community consultation in the initial staff report. Board staff will facilitate the public meetings.
 - 4.4.2 Public meetings will be advertised by the board through an appropriate range of media and on the board's website, and will be held in the schools under review, or in a nearby facility if physical accessibility cannot be provided at the schools.
 - 4.4.3 The first public meeting shall:
 - 4.4.3.1 be held no fewer than 30 business days from the date of Board approval to undertake an accommodation review;
 - 4.4.3.2 provide an overview of the ARC orientation session;
 - 4.4.3.3 present the recommended accommodation options as set out in the initial staff report;
 - 4.4.3.4 present the School Information Profiles (SIPs); and,
 - 4.4.3.5 provide an opportunity for verbal and written feedback.

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- 4.4.4 The final public meeting shall:
 - 4.4.4.1 be held a minimum of 40 business days following the first public meeting;
 - 4.4.4.2 provide an overview of feedback received from the first public meeting;
 - 4.4.4.3 present any alternate accommodation options and rationale developed by the ARC; and,
 - 4.4.4.4 provide an opportunity for verbal and written feedback.

4.5 Final Staff Report

- 4.5.1 School board staff will submit a final staff report to the Board of Trustees and post the report on the board website no fewer than 10 business days after the final public meeting.
 - 4.5.1.1 The final report may be received by the Board of Trustees at a regularly scheduled meeting of the board, a standing committee meeting, or an ARC Special Board meeting.
- 4.5.2 The final report shall include:
 - 4.5.2.1 a community consultation section containing feedback received from the ARC, (including alternate accommodation options and rationale), the public, and information obtained from municipalities and community partners prior to and during the accommodation review;
 - 4.5.2.2 recommended options, which may vary from the proposed options outlined in the initial staff report;
 - 4.5.2.3 a proposed accommodation plan prepared for the decision of the Board of Trustees; and,
 - 4.5.2.4 implementation timeline.

4.6 Public Delegations

- 4.6.1 An ARC Special Board meeting to hear public delegations will be held no fewer than 10 business days following the posting of the final staff report on the board website.
- 4.6.2 Community members and ARC members may directly address the Board of Trustees at the ARC Special Board meeting scheduled to hear public delegations.
- 4.6.3 Persons wishing to delegate the Board must contact the Executive Assistant of the Board. A delegation may be a maximum of 10 minutes, this includes any time required for clarification questions by trustees.
- 4.6.4 Staff will compile feedback from the public delegations. This will be presented to the Board of Trustees as an addendum to the previously presented final staff report.

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4.7 Decision of the Board

- 4.7.1 School board staff will submit the final staff report with the public delegation addendum to the Board of Trustees for their consideration and final decision no fewer than 10 business days following the ARC Special Board meeting for delegations.
- 4.7.2 At a regularly scheduled board meeting or ARC Special Board meeting, the Board of Trustees will make a decision with respect to the accommodation review.
- 4.7.3 The date of the meeting where the Board's decision will be made shall be advertised through an appropriate range of media and on the board's website.
- 4.7.4 The Board of Trustees has the discretion to:
 - 4.7.4.1 approve the recommendation(s) of the final staff report as presented;
 - 4.7.4.2 modify the recommendation(s) of the final staff report as presented; or,
 - 4.7.4.3 approve a different outcome.
- 4.7.5 The final decision regarding the future of a school or group of schools rests solely with the Board of Trustees.

4.8 Transition Planning

Where the Board of Trustees passes a resolution to close or consolidate schools, the board shall:

- 4.8.1 outline clear timelines around when a school will close;
- 4.8.2 inform parents/guardians of the arrangements for the accommodation of students; and,
- 4.8.3 establish a committee to address the transition for students and staff.

4.9 Exceptions

The following outlines circumstances where the board is not obligated to undertake an accommodation review under the Ministry of Education Pupil Accommodation Review Guidelines (March 2015):

- 4.9.1 where a replacement school is to be built by the school board on the existing site, or built or acquired within the existing school attendance area as identified in the Capital Plan;
- 4.9.2 where a replacement school is to be built by the school board on the existing site, or built or acquired within the existing school attendance area and the school community must be temporarily relocated to ensure the safety of students and staff during the reconstruction;
- 4.9.3 when a lease for the school is terminated;

- 4.9.4 when a school board is repairing or renovating a school, and the school community must be temporarily relocated to ensure the safety of students during the renovations;
- 4.9.5 where a facility has been serving as a holding school for a school community whose permanent school is over capacity and/or is under construction or repair;
- 4.9.6 where there are no students enrolled at the school at any time throughout the school year;
- 4.9.7 in circumstances where the school board is not obligated to undertake an accommodation review, the school board will inform school communities about proposed accommodation plans for students before a decision is made by the Board of Trustees;
- 4.9.8 no fewer than five business days after the decision to proceed with the exemption, the board will provide written notice to affected lower and upper tier municipalities, First Nations, Métis, Inuit councils, community partners, and coterminous school boards (through written notice to the Clerk's Department or equivalent) in the areas of the affected school and to the Ministry of Education through the Assistant Deputy Ministry of the Financial Policy and Business Division.

5. Administrative Review

- 5.1 An individual or individuals may seek a review of the school board's accommodation process from the Ministry of Education. In order to seek a review the individual or individual(s) must:
 - 5.1.1 submit a copy of the board's accommodation review policy highlighting how the accommodation review process was not compliant with the school board's accommodation review policy; and,
 - 5.1.2 demonstrate the support of a portion of the school community through the completion of a petition signed by a number of supporters equal to at least 30 percent of the affected school's student headcount (i.e. if the headcount is 150, then 45 signatures would be required). Parents/guardians of students, and/or other individuals that participated in the accommodation review process, are eligible to sign the petition.
- 5.2 The petition must provide a space for individuals to print and sign their name; address (street name and postal code); and to indicate whether they are a parent/guardian of a student attending the school subject to the accommodation review, or an individual who has participated in the review process.

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- 5.3 The petition and the justification must be submitted to the school board and the Minister of Education within 30 calendar days of the board's closure resolution.
- 5.4 When the board receives a petition, the board must:
- 5.4.1 confirm to the Minister of Education that the names on the petition are parents/guardians of students enrolled at the affected school(s) and/or individuals who participated in the review process;
 - 5.4.2 prepare a response to the individual's or individuals' submission regarding the process and forward the board's response to the Minister of Education within 30 calendar days of receiving the petition; and,
 - 5.4.3 post the petition for a review by the Minister of Education on the board's website.

6. Special Considerations

This policy fulfills the requirements of the Pupil Accommodation Review Guideline of the Ministry of Education (March 2015) and is consistent with the Community Planning and Partnerships Guideline (March 2015). Accommodation Reviews can exceed the minimum requirements when deemed necessary and as local circumstances demand.

**ADOPTED AND APPROVED JUNE 20, 2007
REVISED MARCH 24, 2010
REVISED NOVEMBER 25, 2015
REVISED DECEMBER 16, 2020**

TERMS OF REFERENCE

The Board of Trustees is responsible for deciding the most appropriate pupil accommodation arrangements for the delivery of elementary and secondary school programs. These decisions are made in the context of carrying out their primary responsibilities of fostering student achievement and well-being, and ensuring effective stewardship of school board resources. To address changing student populations, utilization and program pressures, and facility conditions, the school board may be required to undertake accommodation reviews leading to possible school consolidations and closures.

The following Terms of Reference reflect the school board's expectations of the roles and responsibilities of the ARC.

1. ARC Mandate

It is the ARC's mandate to uphold and take into consideration the school board's education and accommodation objectives to support student achievement and well-being by:

- a) Ensuring sufficient sized student populations to:
 - i. avoid triple grade classes in elementary schools;
 - ii. provide the compulsory course requirements and a broad range of electives in secondary schools;
 - iii. provide access to specialized programs;
 - iv. afford opportunities for teachers to improve teaching practices through in-school professional learning communities; and,
 - v. enhance opportunities for students to participate in a range of extra-curricular activities.
- b) Complying with Policy 2410 – Transportation of Students with respect to the time spent on the school bus.
- c) Efficiently using limited board resources by reducing or eliminating surplus pupil places.
- d) Ensuring facilities are in a reasonable condition (e.g. structural, mechanical, life and safety, barrier free) to accommodate the educational needs of both students and staff.
- e) Work in partnership with the local community to make the best use of school facilities and augment the educational experience of students through co-location of community agencies and the use of municipal recreation facilities, where it meets the needs of the students, the educational objectives of the board, and is financially viable.

2. Role of the ARC

- a) Represent the schools under review.
- b) Act as a conduit for information shared between the board and the school communities.

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- c) Attend working meetings to review materials presented by board staff and become informed about each school under review.
- d) Comment on the options and seek clarification of the initial staff report.
- e) Provide staff with alternate accommodation options with supporting rationale for such option.
- f) Present alternate accommodation options and supporting rationale at the scheduled public meetings.
- g) Committee members do not need to achieve consensus regarding alternate accommodation options or comments on the recommendations in the initial staff report.

3. Resources Available to the ARC:

- a) The relevant sections of the Capital Plan for the area under review and identification of partnership opportunities or lack thereof.
- b) The initial staff report containing the recommended accommodation option which addresses accommodation issues, where students would be accommodated, what changes to existing facilities may be required, what programs would be available to students, transportation plans, capital requirements, and relevant information from municipalities and community partners.
- c) A School Information Profile (SIP) for each school under review;
- d) Staff resources will be provided to:
 - i. advertise and make arrangements for working and public meetings;
 - ii. posting relevant information to the board's web site;
 - iii. provide relevant data regarding the schools involved in the accommodation review;
 - iv. aid in analyzing alternate accommodation options;
 - v. facilitate discussion regarding accommodation options; and,
 - vi. compile feedback from the committee, the public, municipalities, and community agencies.

4. ARC Procedures

- a) Board administration will facilitate the orientation session, working meetings, and public meetings.
- b) To expedite the review, the public meeting dates shall be established by board administration.
- c) All meetings of an accommodation review shall be open to the public, and the dates of such meetings shall be advertised through an appropriate range of media and published on the board's website.

- d) The ARC will hold a minimum of two working meetings but may hold additional meetings if deemed necessary within the timelines established by Policy 2313 – Pupil Accommodation Review Policy.
- e) The ARC may choose to dedicate a working meeting to solicit feedback directly from the school community.
- f) Working meetings and public meetings do not require a quorum to proceed.
- g) Written comments from the community will be received throughout the accommodation review process and up to two days following the final public meeting.
- h) As the ARC discusses accommodation options, the needs of all students in the schools under review are to be considered free from bias, based on the School Information Profiles and the board’s education and accommodation objectives.
- i) Attendance at public meetings will be recorded in order to track who has taken part in the accommodation review process. Attendance must include the printed name, full address, and signature of attendees.
- j) For the board to be able to verify that a non-parent/guardian of a student in one or more of the schools under review has participated in the review process, the non-parent/guardian must have attended one or more of the public meetings held by the ARC, and their attendance must have been recorded as in 4 (i).
- k) Minutes of the working meetings and public meetings will reflect the opinions expressed and record any materials submitted by the ARC. The minutes and alternative accommodation options and rationale developed by the ARC will be included in the community consultation section of the final staff report.

5. School Information Profile

School Information Profiles (SIPs) are to act as orientation documents to help the ARC and broader community understand the context and rationale surrounding the commencement of an Accommodation Review. The SIP provides data for each of the following considerations about the schools under review:

- a) value to the student; and,
- b) value to the school board.

The SIP is to be completed by school board staff for each of the schools under review at the same point in time for comparison purposes. School boards may include additional items that reflect local circumstances and priorities. While the ARC may request clarification about the information provided in the SIP, it is not the role of the ARC to approve the SIP. At a minimum, the following are data requirements to be included in the SIP:

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- a) Facility Profile:
- i. school name and address;
 - ii. site plan and floor plan(s) (or space template) of the school with the date of school construction and any subsequent additions;
 - iii. school attendance area (boundary) map;
 - iv. context map (or air photo) of the school indicating the existing land uses surrounding the school;
 - v. planning map of the school with zoning, Official Plan or secondary plan land use designations;
 - vi. size of the school site;
 - vii. building area;
 - viii. year built;
 - ix. number of portable classrooms;
 - x. number and type of instruction rooms as well as specialized classroom teaching spaces;
 - xi. area of hard surfaced outdoor play area and/or green space, the number of play fields, and the presence of outdoor facilities (e.g. tracks, courts, etc.);
 - xii. 10-year history of major facility improvements (item and cost);
 - xiii. projected five-year facility renewal needs of school (item and cost);
 - xiv. current Facility Condition Index (FCI) with a definition of what the index represents;
 - xv. estimated cost to address backlog of current renewal projects needed at the school;
 - xvi. estimated cost to address backlog of current renewal projects;
 - xvii. a measure of proximity of the students to their existing school, and the average distance to the school for students;
 - xviii. percentage of students that are and are not eligible for transportation under the school board policy, and the length of bus ride to the school (e.g. longest, shortest, and average length of bus ride times);
 - xix. school utility costs (totals, per square foot, and per student);
 - xx. number of parking spaces on site at the school, an assessment of the adequacy of parking, and bus/car access and egress;
 - xxi. accessibility; and,
 - xxii. On-The-Ground (OTG) capacity, and surplus/shortage of pupil places.
- b) Instructional Profile:
- i. describe the number and type of teaching staff, non-teaching staff, support staff, itinerant staff, and administrative staff at the school;
 - ii. describe the course and program offerings at the school;
 - iii. describe the specialized service offerings at the school (e.g. cooperative placements, guidance counseling, etc.);
 - iv. current grade configuration of the school (e.g. Junior Kindergarten to Grade 6, Junior Kindergarten to Grade, 12, etc.);
 - v. current grade organization of school (e.g. number of combined grades, etc.);
 - vi. number of out-of-attendance-area students;

- vii. utilization factor/classroom usage;
 - viii. summary of five previous years' enrolment and 10-year enrolment projection by grade and program;
 - ix. does school qualify for a funded full-time vice-principal;
 - x. does school qualify for a funded full-time teacher-librarian;
 - xi. current extracurricular activities;
 - xii. are there a sufficient number of students so that courses necessary in each subject area can be run for all three student pathways (university, college, workplace, and apprenticeship);
 - xiii. courses offered in alternate years;
 - xiv. number of eLearning courses;
 - xv. multiple lunches; and,
 - xvi. student supports (e.g. athletic programs/activities, arts, computer technology, leadership student council clubs and programs, etc.).
- c) Other School Use Profile:
- i. current non-school programs or services resident at or co-located with the school, as well as any revenue from these non-school programs or services and whether or not it is a full cost recovery;
 - ii. current facility partnerships as well as any revenue from the facility partnership and whether or not it is a full cost recovery;
 - iii. community use of the school as well as any revenue from the community use of the school and whether or not it is a full cost recovery;
 - iv. availability of before and after school programs or services (e.g. child care) as well as any revenue from the before and after school programs and whether or not it is a full cost recovery;
 - v. lease terms at the school as any revenue from the lease and whether or not it is a full cost recovery;
 - vi. description of the school's suitability for facility partnerships;
 - vii. revenues from community use;
 - viii. community partnerships that have contributed to the operating costs of the school in the past five years; and,
 - ix. heritage building status.