

Reconsidering the Mandatory in Ontario Online Learning Policies

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Abstract

In March 2019, the Ontario government announced that commencing in 2023-2024, secondary school students (Grades 9-12) would be required to gain four of 30 graduation credits through online courses. At the time of the policy pronouncement, these four credits (or courses) would become the first mandatory online courses in Canadian K-12 education. The policy decision and process were challenged publicly, and the educational context changed quickly with the ensuing contingencies of the global pandemic. The policy was subsequently revised and, at present, Ontario requires two mandatory online secondary school credits for graduation, which is twice the requirement of any other North American jurisdiction. In this study, the researchers employ a critical policy analysis framework to examine the concept of mandatory online learning in Ontario through multiple temporal contexts. First, they examine Ontario's mandatory online learning policy prior to the shutdown of Ontario schools during the 2020-2021 global pandemic. Next, they examine aspects of Ontario's mandatory online learning policy in K-12 during the emergency remote learning phase of the pandemic. In the final section, the authors provide a retrospective analysis of the decisions around mandatory e-learning policy and explore policy options going forward for mandatory e-learning in the K-12 sector post-pandemic.

Keywords: mandatory online learning, critical policy analysis, k-12 education, technology-enabled education, emergency remote learning



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Introduction

This paper reviews the research process and findings from a critical policy analysis of a mandatory e-learning policy in Ontario, Canada. Prior to the global pandemic, the Ontario Ministry of Education (ONMoE) announced that secondary school students in Ontario would be required to take four online courses in order to graduate, commencing with the 2023-2024 graduating cohort (ONMoE, 2019a). At the time of the policy pronouncement, these four courses would have become the first mandatory online courses in K-12 Canadian education. There were mixed responses from the public to the original policy pronouncement. Ontario's e-learning policy has undergone multiple changes since that time, in part in response to the global pandemic. The researchers employ a critical policy analysis framework of their own design to examine elements of Ontario's mandatory e-learning policy. Findings are reported relative to multiple contexts: a) the pre-pandemic context of the 4-course mandatory e-learning policy pronouncement; b) mandatory policy during the emergency remote learning phase; and c) the context of e-learning predictions post-pandemic in Ontario. In closing, the authors weigh the policy imperatives, lessons learned, and policy options for e-learning in the K-12 sector going forward.

Responsibility for Canadian education rests with its individual provinces and territories. Ontario is Canada's most populous province with close to 15 million citizens and a reported student enrolment of just over 2 million students, representing approximately 43% of the reported Canadian students K-12 in public schools at that time (Statista, 2020). Decisions about mandatory aspects of e-learning and as a graduation requirement in Ontario schools impact significant numbers of Canadian students, educators, and families and, as such, merit scholarly attention and careful analysis.

Critical Policy Analysis in Education

This paper focuses on the mandatory aspects on Ontario e-learning policy prior to, during, and post-pandemic. Policies are the actions—or inactions—of authorities in response to problems. Fowler (2012) explains that various definitions of public policy refer to decisions or chains of official decisions that include values. She sees policy as a dynamic process where a political system handles a public problem, complete with observable patterns of both activity and inactivity.

Policy analysis is defined as “the disciplined application of intellect to public problems” (Pal, 1992, p.16). It does not rely on one research method but applies various research methods in order to understand policy issues and the processes that go into policy design (Yanow, 2007). Those who analyze policies try to *make sense* of them and discern *what problem the policy is designed to address*. In other words, policy analysts want to understand what is going on. Policy analysts consider what is happening in society in general, considering both the historical lens and the long view. They seek to discern a policy's impacts, including its intended and unintended consequences. Policy analysts collect information about the policy in an organized way and consider broader policy outcomes such as equality and efficiency. To this end, policy analysts consider whose interests are being served by the policy and whose interests may be constrained by a policy, and whether or not those expected to comply with a policy have choice in whether or how they implement the policy. Choice is an important element in policy implementation because it allows policy actors to meet the diverse needs of their constituents. In the case of K-12 educational policy analysis, it is important to consider whether the policy allows decision-making close to the source of potential problems with the policy (e.g., at the

school or district level) to meet local needs. According to Yanow (2007), policies should allow both choice and agency for those impacted by the policy.

Stone (2002) argues that policy cannot be separated from politics. The role of policy analysis is to show how policymaking has deviated from rational analysis. Policy analysts raise awareness of a policy's more political aspects and challenge its objectivity. Policies reflect goals and values which constitute "a struggle over ideas" (Stone, 2002, p. 11). Every policy impacts equity and democracy and the deconstruction of policies should not lead toward simplistic explanations, but consider policies in their complexity (Stone, 2002).

Vidovich (2001) encourages an examination of the contexts surrounding a policy: *the context of influence*, *the context of text production*, and *the context of practice*. Analysts consider the prevailing political conditions, the policy elite, and those whose interests are most powerful. In the context of the policy text production, analysts should ask whose interests a policy is intended to serve, whose voices can be seen in the text of the policy, and whose are excluded. The context of practice is significant for education, as policies can be interpreted differently in different contexts (Vidovich, 2001).

Within different contexts, policies can change over time. This shift has been termed the *trajectory* of a policy (Ball, 1994; Gale, 1999). In investigating policy trajectories, researchers consider people's perceptions and experiences with the implementation of a policy. The term trajectory assumes that policy texts are "not necessarily clear or closed or complete" as written (Ball, 1994, p. 16). One analytical strategy is to look at the space between the origins of a policy and its possible influences. Policy analysts seek clarity of both intention and potential impact.

In 2011, Ball and colleagues introduced the term "policy actors" to describe the work of persons who "do" the policy work in schools, describing them as both the receivers of the policies and those who will enact the policy. Some policy actors are enthusiastic about policies and champion them, while others are critical of the policies (Ball et al., 2011). Policy actors can be influenced in the policy implementation process through incentives and the provision of support. There are various tools that governments can use to promote their educational agenda. Steer et al. (2007) refer to these mechanisms as "policy levers," or the mechanisms through which governments ensure that policies are implemented. In summary, policy analysis is the detailed and disciplined examination of policy that includes consideration of multiple theoretical constructs and terminologies (see Table 1).

There are similarities and important distinctions between policy analysis and critical policy. According to Diem et al. (2014), traditional policy analysis is generally viewed as neutral and value-free with a reliance on scientific measurement. Emerging more recently, critical policy analysis is deliberately informed by multiple perspectives and theoretical underpinnings. Diem et al. (2014) explain critical policy work simply as policy work that acknowledges contexts, values, contestable problems, research findings, and multiple solutions. While recognizing that all critical policy analysis is not the same, they observe that the most common purpose given for policy analysis is to "interrogate" the process of the policy and the players. Critical policy analysis is a tool to question policy work. Diem et al. (2014) identify five fundamental approaches that are seen in "a great deal" of critical policy work (p. 1072):

1. Critical policy analysis examines the difference between policy rhetoric and the reality of practice.

2. When examining the roots of policy, critical policy analysts examine its role in maintaining the dominant culture.
3. Critical policy analysis concerns itself with the distribution of power (as in who gets what).
4. Critical policy analysts consider whether a policy reproduces social inequalities or disrupts them.
5. Critical policy analysts include the voices of under-represented groups.

Critical policy work is purposeful, and its analyses are seen as having breadth and depth (Diem et al., 2014). One of the aims of critical policy analysis is to identify disparities between policy texts and the realities of a policy's impact on actors. Researchers in the critical policy analysis field share understandings that policy is messy, complex, and political (Winton, 2020). Based on the literature, the authors have designed a Critical Policy Analysis Framework to guide their systematic approach to researching policies.

Table 1

Critical Policy Analysis Framework

Policy influences	Policy texts	Policy processes	Critical policy analysis
Assumptions, Belief systems Stance: traditional vs contemporary Political, economic & social influences Context of influence	Legislation Memos Curriculum Context of text production, rhetoric, discourse	Policy trajectory Policy actors Policy levers Context of practice Policy responses: compliance, non- compliance Context of practice	Policy history, complexity and implications Policy vacuums/gaps Rhetoric vs reality Policy alternatives Policy compliance and resistance
Who has (traditional) power and voice in the policy process? Who is missing?	What is the stated public problem that the policy addresses?	What are the intended and unintended repercussions?	Who has power? Who benefits (is marginalized)?

Note. Adapted from “Coming Soon to a Device Near You: A Policy Analysis of Mandatory Online Learning,” by L. Robertson and P. Muirhead, 2020, *Proceedings of The 11th International Conference on Society and Information Technologies (ICSIT 2020)*, p. 21.

Context 1: Four Mandatory Credits

In March 2019, Ontario's Conservative government announced a policy agenda to modernize classrooms, including multiple changes such as: a) expansion of access to broadband internet to rural and remote areas; b) the intent to centralize the delivery of e-learning courses; c) updates to the Provincial Code of Conduct to restrict the use of cell phones and hand-held mobile devices during instructional time; d) an intention to revise provincial assessments; e) proposals to increase class sizes in Grades 7 to 12 from 22 to 28; f) the requirement of four mandatory online courses for secondary school graduation; and g) the intent to increase class sizes for online courses to 35 students (ONMoE, 2019a). Ball (1994) describes policies as “textual interventions into practice” (p. 18), and the March 2019 policy announcement had

considerable implications as an intervention into practice for secondary school operations in Ontario. Elements of the policy pronouncement were not universally welcomed. For example, a policy analysis by the authors regarding the policy direction to restrict the use of cell phones and devices in Ontario schools raised multiple issues (Robertson et al., 2020). Primary among these was the consideration that cell phones offer ways to address the technological digital divide (Gorski, 2005) as phones are the sole digital device in many North American homes. Secondly, multiple jurisdictions employ cell phones successfully for learning. The authors recommended that policy decisions surrounding the uses of phones and devices in schools should be considered in their complexity and in light of research findings, as new technologies offer both affordances and risks (Robertson et al., 2020).

The present policy analysis focuses on the decision to mandate four online courses for. The impacted online courses, or e-learning courses, were not the traditional correspondence type of “distance education” courses (Barbour & LaBonte, 2019). The Provincial e-Learning Strategy (ONMoE, 2013) predates the present Conservative government in Ontario. This strategy defines e-learning as the use of tools from the provincial learning management system (LMS) where there is a scheduled distance between the e-learning teacher and the student. The distance can be temporal or geographic. The e-learning courses offered in secondary schools were asynchronous, with the understanding that e-learning teachers were available to support students at scheduled times. School districts had access to a provincial LMS with standardized e-learning course content. Districts organized the delivery of e-learning courses and some districts formed consortia for sharing content and courses. The provincial e-learning strategy stipulated that the class sizes and student-to-teacher ratios should reflect the “applicable collective agreement” (ONMoE, 2013).

The Conservative government came to power in 2018 in Ontario. At the time of the March 2019 announcement of the four mandatory e-learning course requirements, the number of secondary students enrolled in e-learning courses in Ontario was approximately 5% (Kapoor, 2019) compared to 8% of post-secondary students who enrolled in online higher education courses (Bates, 2018). Calculations by Barbour and LaBonte (2019) indicate that, if the four-course mandate was realized, three out of four students engaged in online learning in Canada by 2023-24 would be from Ontario. Barbour and LaBonte (2019) also projected that the four-course mandate would result in a ten-fold upscaling of the e-learning system in Ontario, creating significant implications for curriculum and staffing. At the time of this mandatory four-course proposal, the technological infrastructure to ensure that all students could access online courses was not fully in place. School districts were at different stages of school-based technology implementation in their schools. In addition, prior to the pandemic, a small percent of parents had students in e-learning courses, but the majority of parents were not familiar with the realities of e-learning before the policy decision was announced. These were factors in the context of the text production as defined by Vidovich (2001).

Implications of Four Mandatory Courses

One group of policy actors, namely the Ontario Secondary School Teachers Federation (OSSTF), responded with concern. OSSTF represents 60,000 secondary school teachers in public schools in Ontario and its membership also includes occasional teachers, educational assistants, social workers, and many others. Their analysis indicated that the requirement for four mandatory online courses would reduce full-time equivalent secondary school teaching positions by 25% by the 2022-2023 school year. The proposed change would cause significant increases to class sizes, decreases in course options available to students, the cancellation of programs, and potential closures of rural schools that would be unable to provide the minimum

core programs. OSSTF also predicted that close to half of Ontario's small-sized secondary schools would lose teachers qualified in languages, computer science, and technology, thus creating shortages of qualified teachers for 44% of mid-sized secondary schools and 33% of large-sized secondary schools (Ontario Secondary School Teachers' Federation, 2019).

People for Education (2019) described the proposed policy change of four mandatory courses as a significant policy change that would have a direct impact on all students in secondary schools. They advised a cautious approach to mandatory online learning. They asked the government to explicitly state the reason for the mandatory online courses and requested more communication and consultation with stakeholders. People for Education also noted that Ontario was the first education authority in North America to require four e-learning courses for graduation, a four-fold increase over any other North American K-12 jurisdiction (People for Education, 2019).

At times the rhetoric was more pointed. In December 2019, the Catholic teachers' union accused the government of an "ideological agenda to cut spending and demonize educators" (Stuart, 2019, para. 1), contrasting with public support for the proposal from the Fraser Institute, who argued that the proposed cuts to Ontario education would bring the education budget to 2016/2017 funding levels by 2023/2024 (MacLeod & Emes, 2019). While both organizations have held longstanding beliefs about educational delivery options and resources, in the eyes of the public the proposed increases in class size, the mandatory e-learning requirement, and concerns to protect full-day kindergarten became conflated as they sought to protect schools (Dhanraj, 2019). Parents were concerned about larger class sizes and the potential loss of programs. This conflation is not unrealistic, as there is precedence in other provinces. In British Columbia (BC), for example, the Distributed Learning (DL) system for online courses is managed by the BC Ministry of Education. According to the BC Teachers' Federation,

The teaching conditions in DL are little regulated. DL teachers are explicitly excluded in the *School Act* from the class-size provisions, and the conditions of work are not covered by the BCTF collective agreement. A few districts have reached a de facto set of principles on staffing, but those are limited in applicability. (BC Teachers' Federation, 2017, para. 4)

In 2018, the newly elected Conservative government in Ontario opened a public consultation on class sizes that concluded in February 2019. The actual results of the consultation were not made public but plans to increase class sizes were posted under the heading "Class Size Consultation Guide" on the ONMoE website, indicating post-consultation that the government intended to increase class sizes (ONMoE, n.d.a). In March 2019, the government proposed that secondary class sizes would increase from 22 to 28 in secondary schools (ONMoE, 2019a). In November 2019, however, the government announced instead that there would be one additional student in Grades 4-8 and a half student added in secondary classes. To mitigate the projected staffing reductions, a \$1.6 billion fund would be set up for teacher job protection so that the staffing reductions could be managed through retirements and voluntary leaves (MoE, 2019b). Parents who participated in the consultation reportedly had overwhelmingly requested that class sizes not increase (Dhanraj, 2019).

Impacts on Graduation Rates

The shifts in policy on class size during this time period caused unrest in a stable system with strong completion rates for secondary graduates. The ONMoE (n.d.c.) reported that, as of August 31, 2019, 87.2% of Ontario students were graduating in five years and 81.4% in four

years. The Higher Education Quality Council in Ontario reported they would find it hard to think of a bigger change for education than the improvement of the Ontario secondary school graduation rate from 13% in 1967 and 56% in 1987 to the present (Gallagher-Mackay & Brown, 2021).

In seeking related research, the authors find there is a paucity of data on success rates for mandatory online learning. No other provinces or territories presently require a mandatory online course for graduation (Barbour & LaBonte, 2019). The BC completion rate for students taking one DL course initially dropped but rebounded by 2012-2013 to be comparable with students not taking an online course (Barbour & LaBonte, 2019). Six American states with virtual schools require a single online course for graduation. There were reportedly 478 virtual schools in 2013-14 in the US and almost all were administered by school districts (National Center for Education Statistics, 2014). Michigan was the first state to require an online course in 2006; however, students in Michigan can meet this e-course graduation requirement by undertaking 20 hours of instruction in their brick-and-mortar classroom using online resources (Michigan Virtual University, 2018).

A 2019 research report on the pass rates of Michigan virtual courses does raise some concerns with respect to equity of outcomes for students of diverse backgrounds (Freidhoff, 2019a). For the 600,000 students enrolled in virtual courses in Michigan, the overall pass rate was 55% and two-thirds were students from poverty. The differential outcomes for these students were concerning. Students from poverty in brick-and-mortar courses had a 70% pass rate, which is 21% higher than peers in virtual courses (Freidhoff, 2019a). In general, Michigan's experience has found that, while 75% of students adapt to online learning, 25% do not (Freidhoff, 2019b). The more successful students demonstrate good time management, independent study habits, and technological preparedness (Michigan Virtual University, 2018). These findings indicate that, going forward, pass rates and graduation rates for differentiated groups need to be carefully monitored during the implementation phase.

Technological Infrastructure

Technological infrastructure is a consideration where the context of practice and the impact of a policy intersect. The ONMoE announced a commitment to guarantee broadband for all Ontario students by 2021-22 (ONMoE, 2019a). Almost all (97%) of Canadian schools have had access to the Internet for some time (Statistics Canada, 2009); however, broadband access is not a "given" for every home. A report by the Canadian Radio and Broadcasting Corporation (CRTC) (2020) indicates that 87.4% of homes in Canada have high-speed internet access, but this average drops to 45.6% in rural and remote areas. Internet access is not equivalent to having the internet as there is a cost factor that not every family can meet when materials must be downloaded for multiple students. For mobile long-term evolution (LTE), the divide is less narrow as 99.5% of Canadians have LTE access and 97.4% of the rural population has access. Another consideration is that Ontario has significantly less free Wi-Fi hotspots than other provinces. For example, BC has more than three times the number of free Wi-Fi hotspots than Ontario (Canadian Radio-television and Telecommunications Commission, 2020). This directly impacts the context of practice where policy is enacted.

The requirement of mandatory online course credits for graduation alongside the simultaneous restriction of the use of cell phones and devices in schools presents a policy paradox (Robertson et al., 2020). Decisions regarding mandatory online graduation credits should reasonably consider the available technologies that impact decisions on course design and teacher support. Technology is gradually becoming more available and affordable. Decisions

about mandatory graduation credits should be based on data indicating that technology access and support have been achieved in equitable ways for all school districts, and that there is affordable and equitable internet access for all populations. These technology considerations should be a critical component of system planning in addition to providing broadband access in schools.

Adjusting to Two Mandatory e-Learning Credits

In November 2019, there was labour unrest and teachers' unions were on work-to-rule. Again, through a press release, the ONMoE changed their policy proposal, announcing that two (not four) online courses would be mandatory with exemptions for individual students and allowances for mini-modules to meet the e-learning requirements (ONMoE, 2019b).

In sum, there were multiple concerns with the proposed four mandatory online learning courses from those who would be charged with the policy enactment (e.g., policy actors) prior to the emergency shutdown of Ontario schools during the 2020-2021 school year. New, emergent aspects of "mandatory" emerged during the pandemic, which are analyzed in the next section.

Context 2: Mandatory e-Learning During the Emergency Shutdown

On March 12, 2020, due to the COVID 19 pandemic, the ONMoE closed schools with two-day's notice and schools remained closed until the end of the school year. The following September, when it appeared that in-person learning would not resume in the schools, the ONMoE published Policy/Program Memorandum (PPM) 164: Requirements for Remote Learning (ONMoE, 2020). The memo defines forms of remote learning for "public health emergencies, pandemics, natural disasters, or when other unplanned events force the closure of classrooms or schools." In the memo, "remote learning" is defined as learning at a distance, "synchronous learning" as learning that happens in real time, and "asynchronous learning" as learning that is not delivered in real time.

PPM 164 introduced multiple new aspects of mandatory online learning. The memo required school districts to provide all students with synchronous remote learning for the school year, commencing one month from the date of the memo which was issued August 13, 2020. Kindergarten students would receive 180 minutes per day of synchronous online learning and students in Grades 1-12 would receive 225 minutes per day. PPMs are policy levers in Ontario, as they are mandatory once published. These policy levers can be applied to ensure that policies are followed. They are tools that governments can use to direct and enforce policy change. For example, if learning with technology was an expectation for students and their progress to that end was reported on the Ontario Report Card, that could be considered a policy lever to increase pressure for the student use of technology. With PPM 164, school districts were required to ensure that parents were provided with schedules for the online learning and that teachers should provide differentiated assessment and instruction and "daily opportunities for meaningful feedback" (ONMoE, 2020).

Barbour et al. (2020) caution that, "the temptation to label everything that is not classroom-based learning as online learning...is prevalent" (p. 1). They further caution that, "this labelling of the teaching methods used when students are not attending in schools is highly problematic" (p. 1). The authors argue persuasively that there are key differences between emergency remote teaching and quality online learning. The significance of understanding the differences between emergency remote teaching and online education rests on assumptions regarding the preparation, delivery and training received by instructors to "teach" online. As Hodges et al.

(2020) observe, when considering the differences found in the rapid move towards offering instruction online (e.g., emergency remote teaching) and classroom-based instruction, the “typical” planning and preparation for teaching online takes months and includes multiple dimensions such as the modality (e.g., blended), pacing, pedagogy, assessment, and student and teacher roles. They argue further that decisions around class size limit the online strategies that can be used (Hodges et al., 2020). PPM 164 (ONMoE, 2020) was a policy lever that dictated the modality, pedagogy, minimum online contact time and assessment to be applied in emergency teaching without these important considerations around teaching online.

In the context of pre-, during, and post-pandemic, there were policy gaps and disconnects. Prior to PPM 164, the word “synchronous” did not appear in any Ontario curriculum policies. This term was added to PPM 164 as a definition in the remote learning context. PPM 164 requires that school districts provide platforms “to allow real-time communication” in remote learning (ONMoE, 2020). In addition, it states that, “synchronous learning platforms should include live video, audio and chat features and be fully accessible” (ONMoE, 2020). The memo suggests that digital tools could include “virtual whiteboards, recording features, participant polling features, and file uploading and sharing features” (ONMoE, 2020). As well, teachers are reminded to review school board cybersecurity and privacy protocols related to remote learning.

PPM 151 mandates the topics which must be addressed on teacher professional development days. This memo describes “how to deliver meaningful remote learning” in a single sentence (ONMoE, 2021a).

Including e-Learning Language in Curriculum and Policy Documents

The term “digital tools” is noticeably absent from secondary curriculum in Ontario, although there are references in early curriculum policies to “information and communications technology (ICT)” and “tools” for ICT. The revised curriculum policy titled, First Nations, Métis, and Inuit (FNMI) Education, states that technology is a tool to gather information (ONMoE, 2019c). This policy expands the listed digital tools to explain that ICT can help students with gathering, organizing and reporting data, and developing social skills through simulations and media production (ONMoE, 2019c). Earlier curriculum policies listed examples of tools such as “portable storage devices to store information, as well as DVD technologies, digital cameras, GIS maps, interactive whiteboards, and projectors” (ONMoE, 2015, p. 55). In the newly created American Sign Language as a Second Language (ASL) curriculum policy, the section on ICT is a single paragraph that includes a new reference and link to digital literacy as a transferable skill without explanation or examples of digital literacy (ONMoE, 2021). It should be noted that both of these newer curricula mentioned are elective courses, and in the case of ASL, the curriculum policy has not been implemented yet.

Addressing Necessary Infrastructure for Mandatory Online Learning

A third area of concern is the lack of supporting infrastructure for a shift to mandatory online learning. Policy levers can establish enabling conditions for policy change such as incentives, awareness raising, capacity-building, vision, and engagement. Currently there is a paucity of policy levers to support a school district’s implementation of technology-enabled learning. For example, developing technology skills is not an expectation, or curriculum outcome, in the K-8 curriculum policies. The word “technology” is part of the title of the Ontario Curriculum Grades 1-8: Science and Technology (ONMoE, 2007), but the learning outcomes of that curriculum do not include digital technology. Technology is featured in some specific curricula in the last two years

of secondary school, but there is an overall vacuum or policy gap in K-10 Ontario curriculum for technology-enabled learning.

Other policy levers that might be used to promote the use of technology for learning are muted or absent. On the Ontario Elementary Report Card, under Learning Skills and Work Habits, students are evaluated on how they “identify, gather, evaluate and use information, technology and resources to complete tasks” (ONMoE, n.d.b., p. 1). The use of technology for learning, collaboration, independent work, or even homework is not present on the report card. In the Canada and World Studies Curriculum for Grades 11 and 12, for example, references are made to using digital cameras and Geography Information Systems (GIS), but this curriculum lacks a focus on technology-enabled learning for inquiry and collaboration. In her 2020 report, Ontario’s auditor general noted that 15% of Ontario’s curriculum was developed 15 years ago and an additional 51% of curriculum was released 10 to 14 years ago (Office of the Auditor General of Ontario, 2020).

A key challenge faced by Ontario school districts is the disconnect between the use of technology in everyday life and its absence or simplification in the administrative policies and curriculum policies in Ontario. In a recent study in one school district, a teacher commented that the report card “really limits teachers because the current curriculum expectations are so outdated.” Curriculum policies and administrative policies need to be aligned and current in order to engage policy actors in policy implementation.

Context 3: Future Directions

Critical policy analysis not only concerns itself with the analysis of public policy and its effect on individuals but also identifies policy gaps or discontinuity between the current state and future states or direction. Comprehensive policies are needed from the ONMoE to create certainty for planning by parents, teachers, and school districts. In this section, the authors examine indications from all three temporal aspects of mandatory online learning in Ontario (pre-post and future online learning) and they find that a number of policy gaps have emerged (see Table 2).

Table 2

Issues and gaps in mandatory online learning policies in Ontario

Key Policy Considerations	Context 1: Mandatory online learning proposal pre-pandemic (four mandatory credits)	Context 2: Mandatory e-learning during the emergency shutdown	Context 3: Mandatory online learning (future directions)
Policy influences Power and voice in the policy process Assumptions, Stance	MoE wants efficiencies through increased class sizes and 4 then 2 mandatory online graduation credits	MoE institutes emergency remote teaching Ministry of Health measures to protect public health	Proposals suggest uncertainty with respect to mandatory elements of online learning

Policy text including e-learning policy, general stance	Credit regulation for online courses (secondary)	Mandated synchronous learning Assumptions about online parent involvement and supervision	Role of TVO/TFO in development and delivery of online courses is uncertain
Policy context, actors, responses	Changes by MoE impact teachers, school districts, and consortia of school districts	Students, teachers, parents, families impacted by remote teaching Mixed parental and teacher responses	The roles of e-learning consortia, school districts and TVO/TFO in e-learning going forward is not clear
Critical policy analysis, history, complexity, gaps, alternatives, assumptions in the policy design, who benefits, does not	Intervention proposed in a working e-learning system with gaps in curriculum policy and missing levers to implement tech	Changing the modality without changing the curriculum or pedagogy	Lack of clarity surrounding quality online education should deliver in a technology-enabled society

In reviewing the key considerations surrounding mandatory online learning policies in the three contexts, a number of policy gaps and lack of coherence emerge. Table 2 summarizes the current state of mandatory Ontario online education. There is a lack of clarity regarding how future online courses will be delivered and how this requirement will be met. While the revised policy mandating first four and then two online courses preceded the global pandemic and was subsequently suspended during the period of emergency teaching, the most recent proposal from the ONMoE indicates an intention to expand the mandate of TV Ontario (TVO). TVO is an English-language, publicly funded educational television network. The proposal suggests that Ontario will move to centralize online course instruction further and seek efficiencies in course delivery. The official response from the Ontario Public School Boards' Association (OPSBA) advises the government not to move to a centralized delivery of online learning, citing the experiences of Michigan Virtual and the Alberta Distance Learning Centre (Abraham, 2021). The school boards' association rationale is that e-learning courses should be delivered closer to the actual students within their school districts. Ontario presently has an e-learning consortia model that is not-for-profit. More than three-quarters of Ontario school districts belong to these consortia which provide opportunities for students to enrol in online courses offered by their home district and other districts (Ontario Public School Boards' Association, 2021). In the ONMoE documents recently acquired by PressProgress (2021), questions have been raised regarding the future staffing and oversight of online student learning. This proposed development creates the potential for Ontario courses to be taught by third-party educators and institutions outside of present regulatory oversight.

It is unclear how the past 18 months of emergency remote teaching have impacted students, educators, educational planning, and online instruction in Ontario. While policies during the pandemic to mandate synchronous remote teaching during the closure of schools have undoubtedly increased the familiarity of teachers, parents and students with the affordances and constraints of using tech for learning, it remains unclear what or if elements of remote teaching will be incorporated into Ontario curricula or into professional practices when schools reopen for

face-to-face teaching in September 2021. As the authors observed, there is little mention of digital competencies in either curricula or in learning expectations reported to parents. It is concerning that a clear vision of technology-enabled learning has not emerged. Online learning should be moving from an emergency response to a variable pedagogy throughout education.

In considering the mandatory requirement for online courses, it is unclear how secondary students can opt out of mandatory online courses. The experiences from Michigan suggest that online learning, as it is presently envisioned, may need concerted efforts to ensure the success of students at risk, those with complex learning requirements and students requiring self-direction and organizational skills. Barbour and Labonte (2019) caution that, when e-learning is mandatory and no longer a choice, the government needs to put necessary steps in place to ensure that all students have access and connectivity. While the present ONMoE recognizes that mandatory online courses may not be appropriate for all students, these gaps between policy and implementation remain.

There is also a lack of clarity surrounding the definition of an online course. To date, while the policy creates a context for the implementation of the new mandatory requirement, there are implementation gaps regarding: a) which courses will or will be available for students online; and b) the nature or underlying philosophy and pedagogy regarding the development and delivery of such courses. The differences between teacher-supported online learning and fully independent online learning are less articulated. Questions abound regarding student, family, and school expectations, the type of learning content, levels of interactivity between learners and instructors (or among learners) and how learning will be assessed across the spectrum of course modalities. Thus, while the intent of the current online course mandate is clear—two online courses as a graduation requirement—the gaps between policy and implementation are considerable.

Online education is characterized by purposeful design, specific considerations about educational components, and the integration of technological applications from enrollment to learning management system, content repository, and synchronous and asynchronous tools to create a seamless learning experience. It is not the same as emergency remote teaching. The government needs to clarify TVO's proposed role in e-learning in Ontario. While policies such as further strengthening the role of the TVO could be seen as a means to ensure that Ontario has the knowledge and capacity to pivot more purposefully during the next public health crisis, the intent of this proposal is unclear and publicly contested.

Conclusion

In this critical policy analysis, the authors examined the policies regarding the Ontario government requirement of first four, then two online credits for secondary school graduation, the mandatory online policies during the shutdown of schools during the pandemic, and potential considerations for mandatory online learning in Ontario going forward. The authors find multiple disconnects between administrative and curriculum policies as well as multiple gaps between the rhetoric of trial balloons launched in news releases and the reality of policy enactment in schools. At the time of publication, criticism of these policy decisions in Ontario continues unabated. The Ontario English Catholic Teachers' Association indicates that 90% of parents surveyed by Angus Reid believe that students receive a higher quality of education in-person and in classrooms when compared to online learning; additionally, 75% of parents surveyed finding that online learning has negatively impacted students' mental health and social milestones (Ontario English Catholic Teachers' Association, 2021). Previous educational

research points to the reality that policy implementation is more supported through consultation and engagement than by mandates. Ontario needs to reconsider the mandatory aspects of mandatory online learning.

Author's Contributions

L. Robertson is the first author, first draft, and final draft. B. Muirhead and H. Leatham are research and contributing authors.

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Ethics Statement

Ethical approval was not necessary for the work described in this article.

Conflict of Interest

The authors do not declare any conflict of interest.

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