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Public administration in the cross-hairs of evidence-based policy and authentic engagement: School closures in Ontario

Abstract: Education policy affects communities across Canada. Changes in demographics, enrolment patterns, and pressures on education budgets have put school closures on the political agenda in many provinces. Implementing these policies is increasingly contested and conflict-ridden. Public administrators are at the cross-hairs of implementing evidence-based policies, based on authentic stakeholder input and engagement. This article examines two cases of school closure policy implementation in Ontario to illustrate the tension between these two important dimensions of public administration and challenges that must be overcome in this and other policy areas where evidence and engagement are increasingly important.

Sommaire : L'éducation est une question de politique qui touche les communautés à travers tout le Canada. Les changements démographiques, les tendances en matière d'inscriptions, et les pressions exercées sur les budgets d'éducation ont placé la fermeture des écoles sur l'agenda politique de nombreuses provinces. La mise en œuvre de ces politiques est de plus en plus contestée et sujette à des conflits. Les administrateurs publics sont dans le collimateur pour mettre en pratique des politiques fondées sur des données probantes, et basées sur les commentaires et l'engagement authentiques des intervenants. Cet article étudie deux cas de mise en œuvre de la politique de fermeture d'école en Ontario, afin de mettre en évidence la tension entre ces deux dimensions importantes de l'administration publique, ainsi que les défis qui doivent être surmontés dans ce domaine de politique et d'autres, dans lesquels les preuves et l'engagement prennent de plus en plus d'importance.

Introduction

Public servants working in complex policy areas like education are increasingly in the cross-hairs of managing expectations. Provinces across Canada are grappling with urbanization, changing demographics and fiscal

constraints that require ongoing educational reforms and school closures. Despite the growing literature and practitioner discourse that public policy and administration need to be evidence-based, and focused on authentic public engagement, implementing school closures shows that these ideals are difficult to meet in practice.

School closures are not a new policy issue (Burns et al. 1984; Doern and Prince 1989), they are highly contested "wicked" problems with political, economic and social dimensions (Irwin and Seasons 2012). This article uses evidence-based policy and authentic engagement scholarship to examine two school closure policy cases in Ontario to illustrate the complexity of policy implementation at the interface of evidence and engagement. It focuses on two central research questions:

1. *To what extent is there tension between the public administration principles of evidence-based policy and authentic public engagement?*
2. *To what extent is an evidence-based approach and authentic public engagement the basis upon which school closure policy implementation decisions are made in Ontario?*

Our analysis focuses on two public school boards[1] in the Greater Toronto Area, the Halton District School Board (HDSB) and the Toronto District School Board (TDSB). These secondary school closure cases were purposively selected to examine the context and factors associated with implementing provincial policies in jurisdictions facing similar urban enrolment and stakeholder engagement challenges. They were also selected based on the access to local documentation and empirical observations by the authors who reside in these regions. While exploratory, and not generalizable to all school closure cases since each school closure case is unique (Seasons et al. 2017), a case study method was utilized to collect qualitative information on each case through document analysis and participant observation (Creswell 1998) to examine and compare the interface of evidence and engagement within and across cases.

This article begins by outlining some of the key concepts and insights from the literature that underpin the analysis; highlights some of the relevant policy context related to school closure policy in Ontario; presents an analysis of evidence and engagement in each case; compares findings within and across the two cases; and offers some conclusions and insights for scholarship and practice.

Evidence-based policy and authentic engagement in public administration

Policy and public administration practitioners implement policies that are responsive to their political leaders and in the public interest. Ideally, this

means using the best available evidence; employing the best tools and technologies; implementing policies efficiently; engaging the public; and maintaining public service values and ethics. This article argues that theoretical and practical insights from the evidence-based policy and the public engagement literatures should be more fully examined and integrated to understand implementation challenges in complex and contested policy areas such as school closures.

Concerns related to evidence and engagement in the policy process and public administration are not new (Weiss 1979). Empirical studies indicate public officials typically use research and evidence that aligns with their preferences (Weiss and Bucuvalas 1980: 429) and may limit using "the best available evidence" because all evidence is not equal (Majone 1989). In the context where evidence is more readily available but also increasingly contested, some scholars argue we "have entered into the evidence age" (Hall and Battaglio 2018: 181) where "evidence-informed" policy action and analysis involves some interplay between facts, norms, and desired actions (Head 2008, 2016).

This article uses Cairney's definition of evidence as "argument or assertion backed by information" in the policy process, recognizing that the phrase 'evidence-based' policy-making is vague and an aspirational concept, rather than a good description of policy-making (Cairney 2016: 4). Evidence-based policy places "[a]n increased emphasis on the use of evidence in policy-making and requires that policy actors, and especially governmental ones, have the analytical capability required to collect appropriate data and utilize it effectively in the course of policy-making activities" (Howlett 2009: 156). Evidence may be ignored for political or ideological reasons, and decisions are made within institutional structures that influence possible choices and outcomes (Parkhurst 2017). To pursue evidence-based solutions, governments recognize the need to share decision-making with actors at multiple levels (Cairney 2016). Parkhurst refers to this as "good governance of evidence" because there is a need to balance the tensions of evidence-based policy and "respect for a democratic decision-making process" (Parkhurst 2017: 140). This article presents one way to focus on "good governance of evidence" at the interface between evidence and engagement in theory and practice.

What constitutes "authentic engagement"? From Arnstein's classic ladder of citizen participation (1969), to recent models that focus on barriers towards authentic public engagement, best practices and design principles (King et al. 1998; Bryson et al. 2013; Fung 2015), there is no shortage of kinds of engagement. The scholarship in public policy and administration in Canada offers many different definitions and related concepts including "consultation," "participation," "public engagement," "citizen-centred approaches" and "democratic administration" (Graham and Phillips 1997; Laforest and Phillips 2006; Lenihan 2008, 2012; Sossin 2010; Levesque 2012; Lindquist et al. 2005; 2013).[2] Our analysis uses the term "authentic engagement" adapted

from King et al. (1998), illustrated in Figure 1 by the shift from conventional public participation to citizen-centred engagement and defined using the 13 dimensions of authentic engagement in Figure 2.


School closures are inherently political and contested

For purposes of this analysis we add three important dimensions from the evidence-based policy literature: "type of evidence," "use of evidence" and "control over evidence" by public administrators. Adding these dimensions related to evidence allows for a more explicit focus on the interface of evidence and engagement in complex policy processes like school closures.

Context and complexity:
school closure policy in Ontario

School closures are inherently political and contested as provincial policies (Doern and Prince 1989). Provinces have jurisdiction over education policy and administering school systems. Provincial politicians and Ministry of Education (MOE) officials work in conjunction with school boards, unions, schools, principals, teachers, parents and students. In Ontario, the MOE determines education policy and sets provincial standards related to school closures and school boards implement those policies.

Figure 1. *Comparison of Conventional and Citizen-Centred Approach*
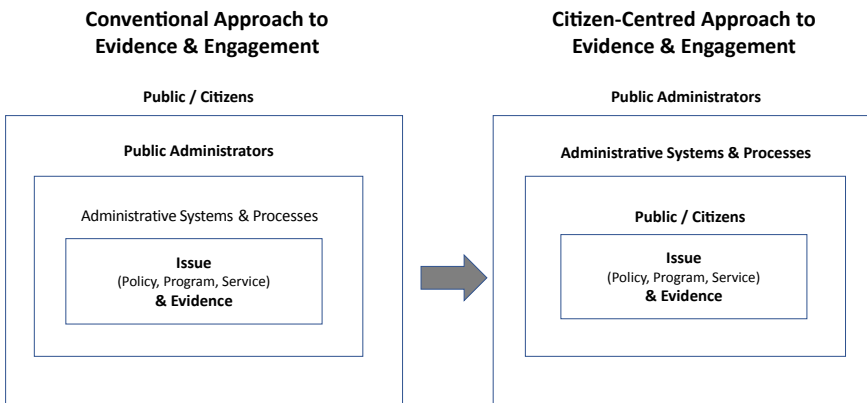
Source: Adapted from King et al. 1998. "Toward Authentic Public Participation in Public Administration," pp. 320–21.

Figure 2. *Dimensions of Evidence and Engagement.*

Comparison of Authentic and Unauthentic Participation

	Unauthentic Participation	Authentic Participation
Interaction style	Conflictual	Collaborative
Participation is sought	After the agenda is set and decisions are made	Early; before anything is set
Role of administrator	Expert technician/manager	Collaborative technician/governor
Administrative skills needed	Technical; managerial	Technical, interpersonal skills, discourse skills, facilitation skills
Role of citizen	Unequal participant	Equal partner
Citizenship skills needed	None	Civics, participation skills, discourse skills
Approach toward "other"	Mistrust	Trust
Administrative process	Static, invisible, closed	Dynamic, visible, open
Citizen options	Reactive	Proactive or reactive
Citizen output	Buy-in	Design
Administrative output	Decision	Process
Time to decision	Appears shorter and easier but often involves going back and "redoing" based upon citizen reaction	Appears longer and more onerous but usually doesn't require redoing because citizens have been involved throughout; may take less time to reach decisions than through traditional processes
Decision is made	By administrator/political and/or administrative processes perhaps in consultation with citizens	Emerges as a result of discourse; equal opportunity for all to enter the discourse and to influence the outcomes
Type of Evidence	internally generated	diverse sources
Use of Evidence	closed/exclusive	open/inclusive
Control of Evidence	highly controlled	shared

Source: Adapted from King et al. 1998. "Toward Authentic Public Participation in Public Administration," pp. 321. [Colour figure can be viewed at wileyonlinelibrary.com]

School closures became governed by a formal MOE policy in 1981 and school boards have struggled with implementing this policy (Burns et al. 1984; Doern and Prince 1989; Greene 1992). In the 1990s, legislative, policy, and funding reforms in the education sector gave the Ontario government more centralized control over funding of school boards and schools after a period of school board amalgamation (MacLellan 2007). Although school closures remained a school board responsibility, they need to be understood in the broader context of major policy reforms, centralized policy influence over capital and operational funding at the school board level, and changing demographics that have resulted in changes to Ontario's public education system in the past 20 years (see Table 1).

By 2014, 57 of 72 school boards across Ontario reported declines in the number of students enrolled, which was not evenly distributed across schools (MOE 2017a). To compound this challenge, 1666 of the province's 4658 school buildings were reported in poor condition, 278 in critical condition, with a $13

Table 1. *Ontario's Public Education System: A 20-year Snapshot*

Education Systems Components	1994-1995	2015-2016	Difference
Population of Ontario	10,950,119	13,448,494	
School Boards	129 Boards 77 English Public 48 English Catholic 2 French Public 2 French Catholic	72 Boards 31 English Public 29 English Catholic 4 French Public 8 French Catholic	
Number of Schools	5,178 Schools 4,370 Elementary 804 Secondary	4,891 Schools 3,978 Elementary 913 Secondary	287 Fewer schools
Number of Students	2,069,989 1,357,487 Elementary 712,502 Secondary	1,993,432 1,357,673 Elementary 637,759 Secondary	76,577 fewer students
Number of Teachers (FTE), including long-term occasional (LTO) teachers	117,492 72,085 Elementary 45,407 Secondary	123,578 81,239 Elementary 42,339 Secondary	6,086 more teachers (full-day kindergarten fully implemented by 2014)
Administrators (Principals and Vice-Principals)	7,716 5,839 Elementary 1,877 Secondary	7,313 5,307 Elementary 2,006 Secondary	403 fewer administrators
Total School Funding Operating	$13.9 billion	$22.6 billion	$8.7 billion increase
Total School Funding Capital investment	$732.3 million	$1.6 Billion	$572 million increase
Total Education Expenditures*	$14.6 billion	$26.6 billion	$12 billion increase
Percentage of Total Provincial Budget	18%	20.7 %	2.7% increase

Note: Ministry called Ontario Ministry of Education and Training from 1994-1999; since 2000-01 Ministry of Education.
*Ontario Ministry of Education Quick Facts 1994-95 and Education Facts 2015-16.
**Ontario Ministry of Finance Public Accounts 1994-95 and 2015-16.

billion estimated backlog in maintenance costs (MOE 2016). The province was also spending far more of its capital budget on new schools and operations. It was in this context that school closures became increasingly contested.

Section 171(1) of the *Education Act* (1990) in Ontario authorizes the locally elected Board of Trustees to close schools in accordance with policies established by the Board from guidelines issued by the MOE. Boards must complete a Long-Term Accommodation Plan (LTAP) showing the current and future state of the elementary and secondary system, enrolment trends, utilization of facilities, factors that influence education trends such as funding, and possible "accommodation" solutions for schools that are experiencing challenges (MOE 2017b). The LTAP outlines a number of initiatives including Pupil Accommodation Reviews (PARs) and community consultation processes and committees called PARCs required by the MOE when a school closure and/or consolidation is being considered. PARs and PARCs must address: changing demographics, enrolment, programming, and facility condition challenges facing a school or schools in a particular area under review.[3] This results in recommendations to School Board Trustees who must decide on closures and consolidations. The accountability for school closures is thus decentralized to school boards, and the fallout from the school-closing process resides with trustees and board administrators.

The Halton District School Board case: challenges to control over evidence and engagement

Halton District School Board (HDSB) serves 62,959 public school students in 86 elementary and 19 secondary schools. The province's *Places to Grow Act* indicates Halton region will grow from 548,435 to 780,000 people by 2031 and the City of Burlington by 8300 new residential units (Canada 2017, Ontario MAH 2018). Despite this projected growth, school enrolments in elementary schools are expected to decline and secondary enrolments are projected to plateau over the next 10 years (HDSB 2017). In 2012-13, the HDSB's identified that a PAR would be required for all Burlington secondary schools due to "low utilization" in its 7 public high schools. The PAR was announced as a new large school, Hayden Secondary, was built due to population growth and increasing density in north Burlington. This school was controversial because it required significant capital investments, there was a dire need for investments in existing high schools, and both of the existing high schools in north Burlington were underutilized.[4] Estimates in the LTAP indicated that Burlington's public secondary school facilities had 1,893 "empty pupil places" of 7,275 available (an overall utilization rate of 78%).

Based on enrolment projections to 2025, the two older high schools in the north (Lester Pearson and MM Robinson) and one in the south (Robert Bateman), were projected to have 50% utilization; Burlington Central High School (BCHS) located downtown was projected to stay around 69%

utilization; and Hayden Secondary was in 2016 already at 118% utilization with 1600 students and some students taking classes in portables. The HDSB multi-year plan stated an average utilization rate goal of 90%. The HDSB announced it was initiating a PAR for Burlington's secondary schools noting, "by eliminating the excess pupil places, HDSB will have the opportunity to apply for funding to rebuild and upgrade older facilities" (HDSB 2016: 40). The PAR process was launched with a report from HDSB staff with 19 options to address "empty pupil spaces" and "under-utilization." HDSB staff indicated their preference was Option 19 to close BCHS, in downtown Burlington, and Lester Pearson High School, in north Burlington.

Contested evidence

Evidence on the need to close high schools in Burlington was contested immediately. In October 2016, the Director of Education said to an audience of concerned parents at the first public information meeting that school closures "are not about economics, they are about improving student opportunities" and that "learning opportunities are limited in small secondary schools" (Miller 2016). The verbal and written narrative was an important part of the qualitative and quantitative evidence produced and communicated by HDSB staff to the public.

First, prior to the start of the PAR process in 2015, HDSB staff produced a report on the benefits and challenges associated with small and large high schools[5], concluding that "while small schools offer a more close-knit community and a high ratio of support staff, large schools offer choices to students, by way of more courses, activities and teaching staff" (HDSB 2016: 23). In a report and presentation to the Board of Trustees in 2016, staff stressed the educational and economic benefits of large schools and the costs of small schools (HDSB 2016b). An examination of staff reports revealed that no existing scholarly evidence and research on large schools and small schools was used or cited. While it is not common practice for school boards to use scholarly sources, there is abundant literature on the large school-small school debate in Canada and "the small school movement" in the United States with significant evidence that bigger is not necessarily better in terms of outcomes.

Second, the 19-option staff report was overwhelming to the media and public. It was not clear why so many options were presented, other than perhaps to illustrate that HDSB staff had thoroughly compared many options, boundary scenarios, and a considerable amount of evidence. Data related to Option 19, was contested immediately because the enrolment figures did not include the 260 Grade 7 and 8 students in the same building as the high school students; transportation evidence was controversial as only 15 of the 600 high-school students were bused to BCHS and Option 19 would require 575 students be bused (HDSB 2016); and the report did not include the full

costs of busing these students to other high schools. The report was also criticized for not including sources of population data and enrolment projections from the City's Planning Department on the downtown core and new residential units planned in the next 10 years.

Third, the evidence in School Information Profiles (SIPs) was criticized because the data and evidence were not sourced. For example, SIPs include neighbourhood socio-economic profiles but did not have citations (HDSB 2017). A review of several board reports and documents indicates that sourcing evidence was not a common or best practice with the HDSB. None of the reports used in the PAR contained bibliographies and citations, thereby contributing to distrust in the evidence being used related to the various options.

Fourth, during the 10-month PAR period, the HDSB indicated that a purpose of the PAR was to generate and consider new evidence for decision-making. To this end, the Board hired a consulting firm, Ipsos, to develop and use online surveys of the community, parents, school staff and students and "clicker" technology at public meetings to ask attendees about their preferences related to the short-listed six options.[6] The community survey generated 1611 responses[7], the results were emailed to every family with students in the Board`s schools. The most supported option (38%) was to change the north Burlington boundaries of Hayden to better distribute students and minimize disruption (Ipsos 2017). However, this was not pursued.

Evidence produced by the HDSB Director and staff was contested in the public forums, in media coverage, and at the final hearing by trustees when staff tabled their recommended option. The debate about evidence became crucial to the PAR process, based on: distrust of the evidence board administrators had collected and presented; the perceived bias in survey questions and results; and the philosophical stance and framing that large high schools were superior to small schools and the solution to the "utilization problem." Using the three dimensions of evidence in Figure 2, there was considerable diversity in the type of evidence; high levels of control over evidence exercised by public administrators and the consulting firm hired by the Board; and the evidence was contested and used differently by Board staff and trustees, community groups and the media in the engagement process.

Engagement and organized resistance

In keeping with provincial guidelines, the public engagement committee (PARC) consisted of a Chair who was a Board Superintendent; a Trustee from outside the Burlington area; a Principal or designate from each high school; two parent representatives from each school[8] and a municipal delegate (appointed by Burlington`s City Manager). The PARC was controversial because a parent member representing BCHS was also a downtown Burlington municipal councillor. Some citizens felt having a city counsellor

biased the process against closing the high school in her community. Others felt it was a strength as the City Manager's appointee brought important information and knowledge to the table.

In addition to the PARC members and public delegations at PARC meetings, "The Board developed an extensive communications strategy in order to ensure that the community was continuously informed throughout the process. All information and accompanying resources were posted on the Board's PAR website for public access" (HDSB 2017). Several channels of engagement were developed. In November 2016, the Director of Education held seven well-attended information sessions (one at each high school). Board staff hired Ipsos to run online surveys and public meetings. PARC members also went on school tours and talked with students.

At the first public meeting in December 2016, several of the over 300 attendees demanded more information on: the fiscal issues facing the HDSB; prior decisions related to Hayden Secondary School; the Board's boundary decisions related to the "utilization problem"; and "the imbalance of elementary schools, with six or more feeding into Hayden, and only one feeding into Pearson" (Ipsos 2017: 18). Attendees questioned the evidence in the staff report related to Option 19 and criticized the "clicker survey" questions as close-ended and biased in favour of large schools and the staff's preferred option. They expressed frustration about the framing of the survey questions and argued that Board staff had made their decision prior to the formation of the PARC (Ipsos Public Affairs 2017: 17-18). Feelings of distrust in these forums were tangible and strategies that pitted different school communities against each other were evident. Observing the process and atmosphere at the public meetings, it was clear that the public viewed them as "unauthentic" using King et al.'s 13 dimensions.

Soon after the initial public meetings, a community organization called *Central Strong* was established, which launched a community signage, public engagement, and media campaign to "Save Central." Downtown businesses mobilized and raised funds to support *Central Strong*'s strategic and professional resistance efforts, led by a group of highly committed and well-educated parents focused on contesting HDSB evidence by collecting, presenting the PARC and Board with new evidence and alternatives, and fully engaging in all aspects of the PAR process.

In January 2017, utilizing the HDSB's own criteria, *Central Strong* produced a comprehensive report that used enrolment data, economic data, geo-spatial data and maps to outline what was not included in the Board's evidence. The *Central Strong* report highlighted that busing all the BCHS students, who then walked to school, were significant economic, social and environmental costs Board staff had not included. Using the Board's own data, it outlined that BCHS had much lower facility renewal costs than Bateman

(using the Ministry's 10-year Facility Condition Index), and the second lowest utility cost per student and per square foot (with only Hayden having lower costs due its high enrolment). Finally, the report outlined that closing Bateman would eliminate 1323 of the current 1800 empty pupil spaces and that the majority of the students attending Bateman already took buses from all over the city to attend specialized programs which could be offered at other schools. The *Central Strong* report also contained new evidence from the City of Burlington and other sources about the development and intensification of the downtown core that were not included in the LTAP. The LTAP indicated 247 units of growth in the BCHS catchment, while the community group documented 1864 new units were planned and approved for the next 10 years. It countered the Board's argument that medium and high intensity development in condos and other residential developments would only yield 14 students per 1000 units, and challenged the Board's position that "the HDSB Planning Department is in regular communication with municipalities and developers to track development and unit occupancy" (HDSB 2016).

As a result of community collected evidence and public engagement, Option 19 to close BCHS was replaced with Option 28c—closing Bateman. This resulted in the mobilization of Bateman and Nelson parents and students as the focus shifted to the two high schools in close proximity to each other in the east end of south Burlington. The PARC was dissolved and the HDSB released its 282-page report recommending Bateman and Pearson be closed and program and boundary changes be made. HDSB trustees public hearings were webcast and 54 delegates presented contesting both evidence and the engagement process. On June 7, 2017 the HDSB voted 10-1 to close Bateman and 8-3 to close Pearson high schools. Both schools will be closed by September 2020.

The Toronto District School Board case: traditional control over evidence and engagement

The Toronto District School Board (TDBS) serves 246,000 students in 471 elementary and 112 secondary schools (TDSB 2018a). Toronto's population is expected to increase to 3,080,000 by 2031 (City of Toronto 2018) but despite this growth, TDBS has been implementing school closures.

In 2014, to address enrolment concerns and support future planning, the TDSB created the Long-Term Program and Accommodation Strategy (LTPAS). The 2016 LTPAS identified 27,000 surplus spaces in Toronto's secondary schools (TDSB 2018b). In keeping with the LTPAS, the TDSB initiated elementary and secondary school Pupil Accommodation Reviews (PARs).

Vaughan Road Academy (VRA), in North Toronto, was one school identified for possible closure.

Controlled evidence

In accordance with the MOE's PAR guidelines, in 2015, a VRA Local Feasibility Team (LFT) was created to review the VRA accommodation evidence and options (TDSB 2016a). The LFT met in April 2016 to determine whether a modified or standard PAR would be undertaken. Given the evidence in the LTPAS, on June 22, 2016, the TDSB "…approved a modified PAR process, due to low enrolment at Vaughan Road Academy (VRA) and the associated challenges the school faces in terms of its ability of deliver strong programs for its students" (TDSB 2016a: 1). Under a modified PAR process, at least one public meeting was required to inform students, parents/guardians and the local community of the TDSB staff recommendation(s). On September 30 2016, a TDSB letter invited parents, guardians, and community members to attend two October 2016 public meetings to discuss the proposed VRA closing (TDSB 2016c).

The TDSB Initial Staff Report (ISR) noted a modified VRA PAR process, with its shorter timeline (minimum of 3 months), could result in the process ending in December 2016, in time to take effect for the 2017-18 school year. On October 6, 2016, TDSB staff met with the Chairs of the school councils affected by VRAs closing and were informed that VRA was scheduled to close in September 2017 (TDSB 2016d). A person is qualified to be elected as a parent member of a school council or its chair, if he or she is a parent of a pupil who is enrolled in the school (Ontario Ministry of Education 2002).

The ISR identified the following items for the Board's consideration: i) the accommodation challenge related to closing VRA; ii) a rationale for undertaking a modified pupil accommodation process; iii) a pupil accommodation plan; iv) a summary of the community consultation to date; v) program considerations; vi) transportation considerations; vii) on-site child care-relocation processes; viii) written comments from the City of Toronto ix) summary of comments received from other public partners/agencies; and x) staff recommendation for approval (TDSB 2016d).

MOE's *Accommodation and Program Review Policy* authorizes a Board to undertake a modified PAR process if there is evidence that at least one of four conditions are met. VRA fulfilled three of these four conditions. The first is when current and projected enrolments have reached a level that results in reduced programming options for students. Although VRA's enrolment capacity was 1,179 students, as of October 2015, according to the ISR, 82% of secondary school students residing within VRAs catchment area were attending other TDSB secondary schools. The ISR stated that VRA's current enrolment of 350 students was projected to decrease to approximately 250 students over the next 5 years, due to TDSB's "optional attendance" policy,

which, if space permits, allows parents/guardians to send their children to a public school of their choice (TDSB 2016d). The second condition is when a school's utilization rate is 65% or lower, and projected to remain so for the next five years (TDSB 2016e). The utilization rate at VRA was 23% and projected to remain well below 65% for the next 5 years (TDSB 2016f). The third condition is distance, in relation to the TDSB's Transportation of Students Policy, which stipulates the walking distance for secondary students is 4.8 kilometers (TDSB 2016e). Closing VRA meant that all students with addresses within the current catchment area for VRA would be within walking distance to their proposed new secondary schools (TDSB 2016e). Overall, the evidence was internally generated, board controlled and not contested.

Attenuated engagement

The purpose of the first VRA public meeting, held in October 2016, was to advise the 160 attendees that the TDSB approved a "modified" PAR process (TDSB 2016a), and pending TDSB approval, staff were recommending VRA be closed, effective June 30, 2017. Meeting attendees were advised that space existed in nearby secondary schools for former VRA students beginning in September 2017. In particular, TDSB staff suggested VRA students in the Interact program be transferred to Oakwood CI, merge the current VRA International Baccalaureate (IB) program with the program at Weston CI and a minimal number of VRA students would transition to Forest Hill CI and York CI (TDSB 2016e). The second meeting, held in October 2016, was attended by 90 people. At this meeting, the slide deck included a section titled "Transition Planning," which offered a more detailed consultation process to assist students to transition to their new schools and to keep parents/guardians informed (TDSB 2016f). Attendees at both October 2016 meetings asked questions related to the recommendation to close VRA. Some VRA students noted that they had no connection to the proposed schools they would be transferred to and their leadership opportunities at these new schools would be limited (TDSB 2016f).

On November 2, 2016, the VRA Student Leadership-Club Heads met with a TDSB Trustee and a TDSB Superintendent of Education. Students noted that it would have been helpful if this meeting had happened a year earlier. Students expressed frustration that no notification of the proposed VRA closure was made public, until late September 2016, yet VRA kept accepting Grade 9 students, even though officials knew VRA was slated to close (TDSB 2016g). The sentiment at these three meetings was that the TDSB staff had already made its decision to close VRA and the approach of TDSB representatives at these meetings was deterministic and closed.

The next step in the VRA PAR process was to invite deputations from citizens affected by the closing of VRA. Several deputations highlighted

concerns related to the feasibility of moving students to Oakwood C.I. when Forest Hill is closer geographically. Other deputations criticized the absence of opportunities for parents/guardian to participate earlier in this decision-making process. Parents also pointed out that in a standard PAR, a PARC committee comprised of key stakeholders, including parents/guardians and students would be the norm; however, under the modified PAR process, there was virtually no engagement and their voices were not included. Concerns over the need to retain the City-run pool and child care facilities at VRA, were also noted (TDSB 2016h). These concerns align with King et al.'s dimensions of unauthentic participation because the process was based on expecting that VRA parents/guardians and students would buy-in to the decision of TDSB officials to close VRA.

In November 2016, the TDSB staff final report recommended closing VRA, based on evidence that enrolment projections at VRA were not anticipated to increase over the short or long-term, and secondary students residing within VRA's catchment area often chose other TDSB secondary schools and programs over VRA. In addition, other larger secondary schools had sufficient capacity to accommodate additional student enrolment from VRA's closing (TDSB 2016i). On December 6, 2016, after a two-month engagement period, a letter from the Superintendent of Education confirmed VRA would close on June 30 2017 (TDSB 2016j). Before the closing, events were held to commemorate that for almost 100 years VRA was central to the lives of its alumni and the community.

VRA did close and its students and staff members were reallocated to other schools. However, the TDSB announced at a community meeting in November 2017 that 750 students from Davisville Junior Public School and Spectrum Alternative Senior School would temporarily use parts of VRA, starting in September 2018, while Davisville school was being repaired (Canadian Broadcasting Corporation 2017). This decision frustrated the Oakwood Vaughan Neighbourhood Action Partnership (OVNAP) members, who preferred VRA be converted into a community hub to provide structured recreational activities and health services for vulnerable populations in Oakwood-Vaughan (Canadian Broadcasting Corporation 2017).

Although the VRA PAR followed the TDSB and MOE policies and procedures, by exceeding the minimum requirements of a modified process, improvements in terms of making the process more authentic could have alleviated frustration from key stakeholders. In addition, the attenuated timeline did not provide community members with sufficient opportunities to organize to oppose VRAs closing, or enable them to engage and better understand the staff and Board's decision to close VRA. This case illustrates a classic example of King et al.'s unauthentic engagement, whereby a school was closed swiftly based on Board evidence and with limited public engagement.

Findings and analysis

These two cases illustrate the complex and contested processes related to implementing Ontario's school closure policy. Although not generalizable to all school closure cases, these cases show that policy history and context are important in complicated cases of school closures. They also reveal interesting findings related to our research questions on the interface of evidence and engagement

Significance of policy context

The findings from both cases are similar to other studies that reveal the significance of understanding policy context. Lindquist's (2005) study of "mega-consultations" related to social policy in Canada reveal that undertaking consultations amidst existing tensions and conflicts can convert government designed forums for engagement into potential sites for contestation and protest. The significance of political context has also been highlighted in previous research on implementing school closure policies in Canada (Doern and Prince 1989; Irwin and Seasons 2012; Seasons 2015). Our cases reveal that even the most well-intentioned engagement processes must be understood, designed, analyzed and communicated with the social, economic and political context in mind. They also reveal that not understanding or being transparent about policy context can influence the evidence used in the engagement process.

The findings from our two cases are also consistent with scholarship that highlights that there are multiple pathways for political influence on evidence at: 1) stages of creation of evidence, 2) selection of evidence, and/or 3) interpretation of evidence (Parkhurst 2017: 59). The cases illustrate that political influence underpinning evidence and engagement can be subtle. Public administrators may not view evidence as influenced by political or fiscal context because they are trying to neutrally implement provincial and board policies to the best of their abilities. However, their lack of transparency related to political context and motivations for their use of certain kinds of evidence in decision-making becomes highly problematic in a context where evidence is readily available to stakeholders and the public.

Findings from the cases also align with the scholarship on evidence-based policy that data and methods used in decision-making are usually internally determined, yet increasingly scrutinized externally. In the TDSB case, the policy context and evidence-based process was not challenged or scrutinized. In the HDSB case, *Central Strong* disagreed with the policy position and methods used (and not used) by board staff. This community group generated high-quality evidence that challenged the type, use and control of evidence used by Board staff. The lack of transparency related to the political and fiscal context and the control over evidence and engagement processes by Board administrators added to the contestation in both cases.

School closure policy implementation:
evidence-based and authentic?

Analyzing the type, use, and control of evidence, indicates that both cases had processes that were evidence-based to some degree. In the HDSB case, public administrators expended significant effort to gather different types of evidence. However, the collection and use of evidence by board staff and the board-hired consulting firm was contested. How the evidence was framed and used for public engagement became problematic. In the TDSB case, evidence was limited to that produced and communicated by TDSB staff, and the focus was on managing a short engagement process. When VRA community members were given an opportunity to comment on evidence or alternative solutions, the ideas were not accepted because the final decision had already been made by TDSB staff and trustees.

> *Even when a public engagement process is comprehensive, it may still be viewed as manipulated and unauthentic.*

Using King et al.'s dimensions of authentic engagement, the HDSB case demonstrates that evidence and engagement processes from the Director of Education and other board staff were not trusted from the outset and that community groups like *Central Strong* can use their skills and resources to produce compelling evidence that can affect outcomes. The TDSB internal staff reports identified only one option, to close VRA, leaving the VRA community with no options or timeframe to challenge the TDSB's evidence, ability to organize to oppose the closing of VRA, or come up with a more creative community solution. While this may have been TDSB's strategy, it was not authentic by using any of King et al.'s indicators.

The HDSB case also outlines that despite using several tools for public engagement, the context, design and communication related to engagement were more important (Bryson et al. 2013). Even when a public engagement process is comprehensive, it may still be viewed as manipulated and unauthentic. In the TDSB case, although the VRA PARC began in 2015, it was retooled to a modified process in 2016, giving little time for community input. In both cases, board administrators controlled the public engagement channels, processes and communication. In both cases, communication was a critical problem because of the timing, style and type of information presented.

In addition, the formal PARC stakeholder component was also criticized. The HDSB PARC consisted of primarily board and school community representatives with some controversy related to the municipal representative. Principals "as resource representatives only" had a muted role, and although teachers were surveyed by Ipsos, their responses

were not made public and they were not permitted by the Board to be involved. However, the HDSB PARC did play a role in generating additional options based on new evidence that emerged during the engagement process, and appeared to influence the final options recommended by HDSB staff. In the TDSB case, the City of Toronto Manager and Council played no active role. In both cases, students attended the public meetings, however, there were no student representatives on the PARC.[9] Representation was an important factor in both cases related to both evidence and engagement.

Tension between evidence and engagement?

Our cases illustrate the tension between the public administration principles of evidence-based policy and authentic public engagement. Both cases indicate that the more administrators try to manage the type, use, and control of evidence, the less authentic engagement is viewed by stakeholders. However, the cases also highlight that both dimensions are important to analyze and not easy to disentangle. For example, in the HDSB case, the use of community, student and staff surveys were part of both evidence and engagement but controlled by Board staff and the "independent" consulting firm. In the TDSB case, parents were asked to provide feedback by completing an informal questionnaire but it was administered and collated by TDSB staff and not a third-party. Both cases show the tensions between evidence and engagement, but also how inter-related they are in practice.

> [T]he less transparent public administrators were about their motives, values and objectives, the less authentic the engagement process was viewed by stakeholders.

Examining the various dimensions of evidence and engagement reveals that control by public administrators remains important in such processes. Although HDSB engagement was more comprehensive and open, control over the entire process was viewed as a way that administrators were trying to appear authentic, when the evidence and engagement processes were highly managed by board staff. In the HDSB case, the more public administrators tried to control the evidence and engagement process and tools, the less authentic the engagement. Both cases also reveal that the less transparent public administrators were about their motives, values and objectives, the less authentic the engagement process was viewed by stakeholders.

This is not to suggest that public administrators should not have control over these dimensions in a representative democracy, but that demands for more deliberative approaches and democratic administration are playing out at this interface. Both cases indicate that evidence-based decision-making is necessary, but not sufficient when working on "wicked and messy" problems in complex, multi-stakeholder environments.

> *[A]uthentic engagement is very difficult to achieve in practice.*

The cases demonstrate that the interface between evidence and engagement needs to be considered in theory and practice. Using King et al.'s 13 dimensions reveals that authentic engagement is very challenging to achieve in practice. However, adding in dimensions of evidence allows for an examination of the interplay of evidence and engagement in contested policy processes such as school closures.

Conclusions: practical lessons and further research

These cases illustrate that school closure policy is complex, with administrators often delegated a difficult process that may not yield win-win outcomes. There are several lessons for school boards and public administrators to consider when designing and managing engagement processes, and a need for more research to learn from and inform such processes.

Acknowledge realities of diverse evidence and complex engagement. Weiss and Bucuvalas (1980) found that when officials favor a policy position, minimal attention is given to the evidence and methodological elements. This finding seems to hold in these cases but our cases suggest that there is increased demand for more public engagement and scrutiny. Public administrators derive power from controlling both the supply of evidence and the design and management of engagement. However, the public and community groups increasingly have access to information, data, and the expertise required to challenge public administrators' control over evidence and engagement. By acknowledging this, public administrators can build trust and openness to different sources and types of evidence and improve engagement.

Importance of sharing policy history, context and values. Transparency regarding the complex political and economic context for policy debates is often missing. Economic evidence appears to be the most important evidence underpinning school closures, yet the least transparent part of the evidence and engagement in each case. By more seriously reviewing and sharing policy history, political and economic contexts, and different value orientations

inherent in complex issues, public administrators will be better positioned to build knowledge and trust with the public in more collaborative ways. Our findings indicate that practitioners also need to consider their position and that evidence is not value-neutral, their unconscious bias is present, and these realities need to be acknowledged and communicated (Parkhurst 2017: 98).

Navigating evidence and engagement is challenging. Outlining the layers of the issue, the power dynamics and challenges of evidence and authentic engagement from the outset can be the basis for building required trust and respect. Public and community groups need communication from public administrators that is more transparent about the complex environment and interface of evidence and engagement within which they are operating. Only then can governments pursue new approaches (Lenihan 2008, 2012), design principles (Bryson et al. 2013) and dimensions of authentic engagement outlined by King et al. (1998) and others. Not managing this interface well may erode the trust and legitimacy of the public service and public administrators, particularly in the growing number of "thorny" policy areas like school closures.

> *There are likely no optimal solutions in these two cases but some argue that more creative, community-based solutions are possible.*

From control to creative solutions. There are likely no optimal solutions in these two cases but some argue that more creative, community-based solutions are possible (Seasons 2015, Season et al. 2017). The PAR process was revised to include more of a focus on community engagement and partnerships but in June 2017 the Ontario government placed a temporary moratorium on school closure policy that was still in place as of December 2019. It is not clear if this policy review will address some of the challenges illuminated through our two cases. It remains to be seen how school closure policy will evolve under the Ford Conservative government but continued budget reductions will further increase pressure on school boards. This may compound problems that administrators face related to evidence, engagement, and pursuing more creative, community-planning approaches to school closure policy implementation.

Longitudinal and comparative research. School closure research focused on case studies has garnered scholarly interest for some time (Doern and Prince 1989). There is a need for more longitudinal research on economic and fiscal context and implications after decades of school amalgamations and closures (Irwin and Seasons 2012) and on variations across urban and rural regions and the four school systems in Ontario (Seasons et al. 2017).

Future lines of inquiry could also use other methods such as interviews with decision-makers and practitioners; compare school closure policy across provinces and other jurisdictions; or examine the interface of evidence and engagement in other policy areas.

Finding a better path forward related to school closure policy implementation where evidence and engagement are in tension is a tall order. Similar challenges exist in other policy areas where public administrators find themselves in the cross-hairs when implementing contested policies at the interface of evidence and engagement. As public demands increase on both these fronts, public administration that embraces these complexities can hopefully advance both theory and practice.

Notes

1 The four types of school boards in Ontario are: English Public, English Catholic, French-language Public and French-language Catholic.
2 While public engagement is a long-standing area of scholarship and practice, many scholars have documented the increasing emphasis on public engagement related to democratic administration and the growth of the "public engagement industry" in Canada and other jurisdictions (Lee 2015).
3 In June 2017, the Minister of Education announced a moratorium on school closures so the province could review the Pupil Accommodation Review (PAR) process and guidelines again and gather feedback on a series of proposed revisions from the public, municipalities, and education sector partners. In April 2018 the Ministry released its *Revised Pupil Accommodation Review Guideline* (PARG) to be used in conjunction with its *Community Planning and Partnerships Guideline* (CPPG). Our two cases selected for analysis are both public school boards, not part of the Catholic or French school board system, and both cases occurred prior to the 2018 PARG being released and change in government.
4 Analysis of HDSB budgets (2010-2017) for this article revealed that capital funding for 'new schools' and 'land for new schools' received the vast majority of funding compared to 'school condition improvement'. For example, in 2012-13 HDSB funded $27 million for new schools, $7 million land for new schools, and $2.7 million for 'school condition improvements' across all HDSB schools.
5 The Ontario Ministry of Education does not have a formal definition of large and small schools. In this case HDSB board staff defined small schools with enrolments in the range of 450 – 600 students and large schools with enrolments of 1000–1200 students. The average size of a high school in Burlington at the time was 781 students.
6 As a result of new evidence and engagement, the number of options grew from 19 to 28.
7 Some 81% of respondents to the survey were parents, 10% were 'other' community members, business owners, 6% were students and 3% were HDSB staff. The highest group of school affiliated respondents (35%) were from elementary schools; 28% were from one high school (Nelson High) that became a target of closure as the process unfolded, and 17% were from BCHS, the downtown high school targeted in preferred Option 19.
8 1 parent selected by Superintendent through submission of expression of interest and 1 parent nominated by School Council Chair
9 The 2018 revisions to the MOE's PAR guidelines address the need for student engagement. Several changes were made to the PAR guidelines that now require more formal engagement of municipal representatives and staff and some student engagement.

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