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Policy/Program Memorandum 167

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Subject: Online learning graduation requirement

Application:

Directors of Education

Chairs of District School Boards

Supervisory Officers and Secretary-Treasurers of School Authorities

Principals of Elementary Schools

Principals of Secondary Schools

Principals of Continuing Education

Principals of Inspected Private Schools

Principals of Inspected International Schools

Principals of Inspected First Nation / Federally-operated Schools

Executive Director, Provincial and Demonstration Schools

Director of Education, Centre Jules-Léger Consortium

Principal of the Independent Learning Centre

Purpose

The purpose of this memorandum is to provide direction to Ontario schools ^[1] on the implementation of the online learning graduation requirement and opt-out process.

This requirement is designed to support students ^[2] to enroll in online learning courses as part of their secondary school program, in order to support the development of digital literacy and other important transferable skills that will help prepare them for success after graduation and in all aspects of their lives. It is guided by a vision of an Ontario where every student has equitable access to high-quality online learning within a modernized education system that prepares them to succeed in a digital and ever-changing world. Refer to the “Eligible credits” section for a detailed definition of “online learning”.

Where any direction of the Policy/Program Memorandum (PPM) conflicts with applicable laws or collective agreement provisions, the applicable laws or collective agreement provisions prevail over the PPM.

The Ministry of Education recognizes the importance of respecting French minority-language rights holders and denominational rights holders.

Ontario students have been using online learning to earn high school credits towards their diploma since 2004. Expanding access to high-quality, Ontario teacher-led online learning will enable students to:

- access a wider variety of courses no matter where they live or go to school, allowing them to shape their education based on their individual needs and goals
- learn in engaging new ways, such as through hands-on, interactive features, simulations and collaboration with peers across the province
- increase their digital fluency and gain transferable skills to support lifelong learning and employment opportunities

We live in an increasingly digital world and students require the skills necessary to operate in both the physical and digital space. By expanding and modernizing online learning, students will have greater flexibility, more choice, and will graduate with skills needed in all aspects of their lives, including to enter the workforce. Employers are looking for people who understand the importance of technology and can use it in ways that will help their businesses thrive in a competitive, globally connected economy. Online learning is one important way that students can develop these skills and become lifelong learners.

Online learning graduation requirement

Beginning with the cohort of students who entered Grade 9 in the 2020-21 school year, all students must earn a minimum of two online learning credits as part of the [requirements for an Ontario Secondary School Diploma \(https://www.ontario.ca/page/high-school-graduation-requirements\)](https://www.ontario.ca/page/high-school-graduation-requirements) unless they have been opted out or exempted in accordance with the processes described in this memorandum. Adult learners entering the Ontario secondary school system in 2023-24 or later will also be required to meet this graduation requirement unless they opt themselves out of the requirement in accordance with the processes described in this memorandum.

Students working towards other certificates (for example, the certificate of accomplishment or an Ontario Secondary School certificate) are not required to complete the online learning graduation requirement, yet may be encouraged to enroll in online learning courses to support the development of digital literacy and other important transferable skills that help prepare them for success after graduation and in all aspects of their lives.

Eligible credits

For the purposes of this Policy/Program Memorandum, *online learning courses* or *online learning credits*, also known as “e-learning” courses or credits, are Grades 9 to 12 credit courses that are delivered entirely using the internet and do not require students to be physically present with one another or with their educator in the school, except where they may be needed for:

- examinations and other final evaluations
- access to internet connectivity, learning devices, or other school-based supports (for example, academic, guidance, special education, mental health and well-being supports, and required initial assessment and in-person learning for English language learners and students of Actualisation linguistique en français (ALF) or Programme d’appui aux nouveaux arrivants (PANA) at their early stages of language acquisition)

Students must successfully complete the equivalent of at least two full online credits to fulfil the graduation requirement. Online learning credits towards the graduation requirement may be earned at any time during the student’s secondary school program or, under exceptional circumstances, an individual student in Grade 8, with parental consent, may be given permission by the principal of a secondary school to “reach

ahead” to take secondary school courses, either during the school year or in the summer prior to entering Grade 9 (please refer to *Ontario Schools, Kindergarten to Grade 12: Policy and Program Requirements* for more information on these credits).

All online learning credits earned at a school authorized to offer credits towards an Ontario Secondary School Diploma may count towards the graduation requirement.

In online learning courses delivered by Ontario’s publicly funded secondary schools, coursework is teacher-led. The content is offered through a secure learning management system, allowing students and educators to communicate and share learning and coursework online. School boards may, for example, use the ministry’s Virtual Learning Environment (VLE) for this purpose, which is available for publicly funded school boards to use at no cost.

Students from the same online class may follow different timetables and be from different schools or school boards. In publicly funded secondary schools, students complete their online coursework with the support of a certified Ontario educator ^[3] who provides instruction, ongoing feedback, assessment, evaluation, and reporting including implementing any accommodations and/or modifications identified in the student’s Individual Education Plan.

Ineligible credits

Credits that shall not count towards the online learning graduation requirement include those earned through:

- **in-person learning**, in which students are physically present with other students in the same course and their educator in the school environment
- **blended learning**, in which digital learning resources are used in an in-person learning setting, or in which students are taught part of the time in person in the school environment and part of the time online
- **flipped classrooms**, a type of blended learning in which students are introduced to content online and practice working through it in person with their educator in the school environment
- **remote learning**, characterized by minimum synchronous learning requirements, among other requirements as defined in [Policy/Program Memorandum 164 \(https://www.ontario.ca/document/education-ontario-policy-and-program-direction/policyprogram-memorandum-164\)](https://www.ontario.ca/document/education-ontario-policy-and-program-direction/policyprogram-memorandum-164)

Exception: remote learning credit earned in 2020-21

The ministry recognizes the extraordinary circumstances of the COVID-19 pandemic. As a result, this Policy/Program Memorandum recognizes up to one secondary school credit completed by Grade 9 students in the 2020-21 school year during the province-wide school closures (from April 2021 to June 2021) may be counted towards the graduation requirement. Schools should select one of these credits and record it in the system they use locally for tracking the requirement and reflect the completion of the selected credit when reporting through the Ontario School Information System (OnSIS) towards the student’s online learning graduation requirement. The course itself does not need to be flagged as an “online course”. It will be counted under the “Diploma Requirements” “Online Learning Graduation Requirement” section of the provincial report card template.

Opt-out process

School boards must develop and implement a protocol or procedure ^[4] that allows for students to be opted out of the online learning graduation requirement:

- at the request of their parent(s)/guardian(s)
- at the student's request, if they are 18 years of age or older (or if they are 16 or 17 years of age and have withdrawn from parental control)

Minimum requirements

The school board must make available a digital and/or paper-based “opt-out form” that a parent/guardian, a student who is 18 years of age or older, or a student who is 16 or 17 years of age and has withdrawn from parental control, may use to record their decision to opt out of the graduation requirement. The school board may use the sample form provided in the Appendix to this memorandum or create their own form if it contains, at a minimum, the information in the sample form.

A parent/guardian, a student who is 18 years of age or older, or a student who is 16 or 17 years of age and has withdrawn from parental control, may opt out of the graduation requirement for any reason during the student's secondary school program by submitting the form to the school that holds the student's Ontario Student Record. The school must acknowledge the receipt of the form once submitted and include it in the Ontario Student Record of the student. Once the form has been included in the student's Ontario Student Record, the graduation requirement will not apply to the student. School boards may establish an annual cut-off date by which the completed opt-out form must be submitted to the school for it to take effect before the end of the school year.

Where necessary, school staff may contact a parent/guardian to discuss the student's individual needs and the appropriateness of online learning for the student. They may also contact the student if they are 18 years of age or older or are 16 or 17 years of age and have withdrawn from parental control. During these discussions, school staff may or may not recommend that a student be opted out of the graduation requirement. However, it must be made clear that the choice is ultimately that of the parent/guardian, student who is 18 years of age or older, or who is 16 or 17 years of age and has withdrawn from parental control.

Responsibilities for reporting

Reporting requirements

The principal of the school holding the student's Ontario Student Record will ensure that a determination has been made whether the student has met the online learning graduation requirement and if so, will ensure this is indicated on the Ontario Student Transcript and the student's report card. If the graduation requirement does not apply, for example due to an opt-out, this will also be indicated on both the Ontario Student Transcript and report card. This will be recorded on the transcript as “Online Learning Graduation Requirement - Non-Applicable”.

Each student's progress towards the graduation requirement will be tracked by the school, including which credits were completed through online learning. Progress towards the completion will be communicated to parents/guardians, or the student if they are 18 years of age or older or 16 or 17 years of age and have withdrawn from parental control. This may be communicated, for example, through the student's report card.

Any required reporting on the graduation requirement and opt-outs must be completed through OnSIS. School boards currently report online learning data through [OnSIS](#) using specific course delivery types intended for online learning or e-learning courses. It is expected that school boards will continue to report online learning data in this way through [OnSIS](#).

Recording of grades

All reporting and recording of student information for online courses remains the same as for courses delivered through classroom instruction, per [Growing success: assessment, evaluation and reporting in Ontario schools \(2010\)](http://www.edu.gov.on.ca/eng/policyfunding/growsuccess.pdf) (<http://www.edu.gov.on.ca/eng/policyfunding/growsuccess.pdf>). The marks reporting schedule of an online learning course will be that of the school delivering the online learning course in accordance with the reporting schedules outlined in Growing Success. The same criteria for full disclosure that apply to in-person courses will also apply to online learning courses as outlined in the [Ontario student transcript manual](http://www.edu.gov.on.ca/eng/general/elemsec/ost/ost.html) (<http://www.edu.gov.on.ca/eng/general/elemsec/ost/ost.html>).

The school delivering the online learning course(s) will ensure mid-term and final grades are sent both to the school holding the student's Ontario Student Record and the parent/guardian or student if they are 18 years of age or older or 16 or 17 years of age and have withdrawn from parental control. This may be communicated, for example, through the provincial report card. The school holding the student's Ontario Student Record is responsible for including the report in the student's Ontario Student Record and the credit information on the Ontario Student Transcript.

Description of requirement in course calendar

School boards will ensure that a description of the online learning graduation requirement and the opt-out protocol or procedure are included in course calendars.

A sample description is included as an Appendix to this memorandum. The course calendar must include at least the information in the sample description.

Student transfers

If a student transfers to the school from outside of a publicly funded school board, the principal will ensure a determination is made regarding how many online learning credits towards the graduation requirement may be considered completed based on their evaluation of the student's learning. As with all determinations of credit equivalency, the principal will ensure that a record of this determination and the rationale is kept in the student's Ontario Student Record.

If a student transfers from outside of a publicly funded school board where they were previously exempted from the online learning graduation requirement, a new opt-out form will need to be completed.

Principal's discretion

The principal of the school holding the student's Ontario Student Record will have the discretion to exempt students under 18 years old and still under parental control from the online learning graduation requirement without parental consent if they determine the need is pressing and in the best interests of the student and the parent cannot be reached. However, this authority shall not be used to circumvent parent/guardian choice.

Where principals make a determination to exempt a student, if possible the parent/guardian shall be electronically or physically mailed a notification by the principal in writing with a rationale outlining why the exemption was made, and a copy of the notification must be included in the student's Ontario Student Record. Once the notification is included in the student's Ontario Student Record, the graduation requirement shall not apply to the student.

Availability of school supports

Supports that are available to students in publicly funded schools (e.g., guidance, nutrition programs, extra-curricular activities, services for English-language learners) will continue to be made available to the students

at their school while they are enrolled in online learning. A point of contact in each school will be available to serve as a conduit between the online learning educator and additional supports that may be required by the student. If a student in a publicly funded school has an Individual Education Plan, the plan should be shared, when appropriate, with an educator instructing an online course delivered by another publicly funded school board, with the necessary consent.

Appendix: Sample forms

Sample A: information for course calendar

Online learning graduation requirement

Students are required to earn two online learning credits to graduate from secondary school, beginning with every student who entered Grade 9 in the 2020-21 school year. The graduation requirement is intended to support students in developing familiarity and comfort with learning and working in a fully online environment, as well as developing digital literacy and other important transferable skills that they will need for success after secondary school, including in post-secondary education and the workplace.

Definition of “online learning” for this graduation requirement

- Online learning credits that count towards the requirement are earned through courses that rely primarily on communication between students and educators through the internet or another digital platform.
- Online learning credits that count do not generally require students to be physically present with one another or with their educator in the school, except where required for:
 - examinations and other final evaluations
 - occasional meetings with educators and other school staff, and
 - access to internet connectivity, learning devices, or other supports (for example, guidance, special education and mental health and well-being supports, and required initial assessment and in-person learning for English language learners and students of Actualisation linguistique en français (ALF) or Programme d'appui aux nouveaux arrivants (PANA) at their early stages of language acquisition)
- In online learning courses delivered by schools in the publicly funded education system, coursework is teacher-led.
- Students from the same online class may follow different timetables and be from different schools or school boards.
- Students in publicly funded schools complete their online coursework with the support of a certified Ontario educator with whom they communicate, and who provides instruction, ongoing feedback, assessment, evaluation and reporting as needed, including implementing any accommodations and/or modifications identified in the student's Individual Education Plan.

In-person courses that use digital learning tools in a physical classroom do not count towards the online graduation requirement, nor do remote learning courses that rely on a minimum requirement for synchronous learning.

There is one exception: **Up to one** secondary school credit that was completed by students who were in Grade 9 during the province-wide school closures (from April 2021 to June 2021) may be counted towards the graduation requirement, in recognition of the extraordinary circumstances of the COVID-19 pandemic.

Selection of courses should consider future pathways, the ability and interests of the student to learn in a fully

online environment and any potential supports that may be needed. Meeting the online learning graduation requirement should not pose a barrier to graduation for students. As with all learning, students taking online courses will have access to the supports they need through their school, (e.g., guidance, nutrition programs, extra-curricular activities and services for English-language learners). If a student in a publicly funded school has an Individual Education Plan, the plan should be shared, when appropriate, with an educator instructing an online course delivered by another publicly funded school board, with the necessary consent.

Check with your local school if you have questions regarding the registration process.

Parents/guardians may choose to opt their children out of the mandatory online learning credits required for graduation. To opt out, a parent/guardian must submit an opt-out form to the school. Students 18 years of age or older, or who are 16 or 17 years of age and have withdrawn from parental control, can also opt out of the graduation requirement by submitting an opt-out form to the school. School boards must also allow for students and parents/guardians to opt back into the online learning graduation requirement should their decision change. Please contact the school for further information on this process.

Sample B: Opt-out form

About the online learning graduation requirement

Students are required to earn two online learning credits to graduate from secondary school, beginning with every student who entered Grade 9 in the 2020-21 school year. Adult learners entering the Ontario secondary school system in 2023-24 or later will be required to meet this graduation requirement and may opt themselves out of the requirement. The graduation requirement is intended to support students in developing familiarity and comfort with working and learning in a fully online environment, as well as developing digital literacy and other important transferable skills that will help prepare them for success after graduation and in all aspects of their lives.

Meeting the online learning graduation requirement should not pose a barrier to graduation for students. As with all learning, students taking online courses will have access to the supports they need through their school, (e.g., guidance, nutrition programs, extra-curricular activities and services for English-language learners). If a student in a publicly funded school has an Individual Education Plan, the plan should be shared, when appropriate, with an educator instructing an online course delivered by another publicly funded school board, with the necessary consent.

Parents/guardians may choose to opt their child out of the mandatory online courses required for graduation. Students age 18 years of age or older or students who are 16 or 17 years of age and have withdrawn from parental control can also opt out of the graduation requirement. School boards must also allow for students and parents/guardians to opt back into the online learning graduation requirement should their decision change.

I agree with the following statements:

- Having reviewed the online learning graduation requirement and the availability of supports for online learning through my child's/my school, I would like to opt my child/myself out of this requirement.
- The benefits of online learning have been shared with me by the school, including how the development of digital literacy and other important transferable skills are intended to help prepare students for success after graduation and in all aspects of their lives.

I understand the following statements:

- Upon receipt of this form by my child's school/my school, my child/I will not be required to earn two online learning credits to earn an Ontario Secondary School Diploma.

- My child/I will face no academic penalties for opting out of this graduation requirement.
- My child/I will continue to complete all other applicable graduation requirements.
- This will be recorded on my child's/my transcript as "Online Learning Graduation Requirement - Non-Applicable".

Student's First Name

Parent/Guardian First Name
(if applicable)

Signature of Parent/Guardian or Student Age 18 or Older, or
Student who is 16 or 17 and has Withdrawn from Parental Control

Student's Last Name

Parent/Guardian Last Name
(if applicable)

Date

Please note:

Upon receipt, this form will be included in your child's/your Ontario Student Record.

You will receive an acknowledgement from the school by
_____ [letter/email/text] by _____ [insert date].

If you do not receive an acknowledgement, please contact:
_____ [contact name here].

Please return this signed form no later than: _____ [insert date].

Updated: February 28, 2022

Footnotes

- [1] [^] In this memorandum, *school(s)* refers to any institution that offers secondary school credits towards an Ontario Secondary School Diploma, including schools operated by district school boards, school authorities, and Provincial and Demonstration Schools (including the schools operated by the Centre Jules-Léger Consortium), as well as Education and Community Partnership Program, inspected private schools, inspected international schools, inspected First Nation/federally operated schools and the Independent Learning Centre.
- [2] [^] In this memorandum, unless otherwise stated, student(s) means students in Grades 9 to 12 who are enrolled in a school as defined above and includes adult learners as outlined in the Online Learning Graduation Requirement section.

- [3] [^] [The Ministry of Education](#) expects that school boards ensure that staffing for online learning is conducted in accordance with the relevant collective agreements and policies. School boards are responsible for ensuring that educators delivering online learning courses have the appropriate hardware, software and training, as outlined in collective agreements and policies.
- [4] [^] [School boards](#) must allow for students and parents/guardians to opt back into the online learning graduation requirement should their decision change and document this in the student's Ontario Student Record. School boards may establish an annual cut-off date for this option.