



Can We Call Them Credit Mills?

Assessing the Legitimacy of Some Independent Schools in Ontario

Joanna DeJong VanHof
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Key Points

- Is there a way to distinguish a “credit mill” from a “legitimate” school? This paper proposes a framework of seventeen criteria by which a school’s legitimacy can be assessed.
- The framework is applied to a group of 272 independent schools in Ontario that previous research suggested may have some credit mills among them. (This group contains about one quarter of all independent schools in the province.) Many of these 272 schools tend to enrol international students.
- When scored according to the framework, 78 of the schools are found to have weak legitimacy, 156 schools have moderate legitimacy, and 38 schools have strong legitimacy.
- Yet almost all of the schools in the group (251 out of 272) are authorized by Ontario’s Ministry of Education to grant credits toward the Ontario Secondary School Diploma (OSSD), a valuable credential.
- To better understand the inspection process and approval to grant OSSD credits in this group of schools, the researcher obtained copies of inspection reports from the Ministry of Education, through a Freedom of Information request.
- The concerns that inspectors mention most frequently relate to assessment and evaluation practices, and attendance and course hours. Concerns evidently exist regarding the academic quality of the schools and their degree of adherence to ministry requirements.
- The criteria in the legitimacy framework presented in this paper cast a broader net than the ministry’s inspections do, and raise additional concerns. For example, one school that is ministry-authorized to grant OSSD credits offers links to gambling sites on the school website.
- The state, the individual, and civil-society institutions (such as school associations) each have a role to play in the regulation and delivery of quality K–12 education. This paper concludes with policy suggestions for how Ontario can strengthen school accountability and regulation, to better ensure quality in education and the protection of international students in particular.

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Introduction

It is an appropriate goal of public policy to ensure that there are no failing schools.

—Dr. Charles Glenn¹

Independent schools in Ontario are highly varied—in educational philosophy, religious or non-religious identity, kind of student targeted, curricular emphasis, location, size, and mode of delivery.² In Cardus research published in 2022, “Naturally Diverse: The Landscape of Independent Schools in Ontario,” a typology was created for the 1,445 independent schools that existed in the province at that time, in order to examine the number of schools and enrolment in each type.³

Are some of these schools “credit mills”?⁴ Media stories and academic research suggest that credit mills may exist in Ontario’s K–12 landscape.⁵ This term is typically used to refer to schools that exist more to generate revenue than to educate students. Credit mills provide students with an academic credential of dubious quality in exchange for tuition fees charged. The nature, amount, or quality of the academic work required, and the standards of evaluation, are typically not commensurate with the norms that are widely shared in the education sector in general.

Is there a way to distinguish credit mills from the other, legitimate schools that exist in the independent-school sector? If “illegitimate” schools exist, what observable characteristics do they share? Can a profile of an illegitimate school be built? This study seeks to explore and propose answers to these questions. It offers a framework by which a school’s legitimacy can be assessed, and applies it to a group of schools identified in the previous Cardus research as Credit Emphasis schools.

¹ C. Glenn, “Segregated Schools and Virtuous Markets,” *International Journal for Education Law and Policy* 5, no. 10 (2009): 10–23, quoted in A. Berner, “The Case for Educational Pluralism in the U.S.,” Manhattan Institute, July 2019, <https://manhattan.institute/article/the-case-for-educational-pluralism-in-the-u-s>.

² The author would like to express gratitude to Dr. Scott Davies (University of Toronto) and Dr. Derek Allison (Cardus Senior Fellow) for their feedback and helpful critique of the research proposal leading to this paper.

³ D. Hunt, J. DeJong VanHof, and J. Los, “Naturally Diverse: The Landscape of Independent Schools in Ontario,” Cardus, 2022, <https://www.cardus.ca/research/education/reports/naturally-diverse-the-landscape-of-independent-schools-in-ontario/>.

⁴ Please note the terms “credit mills,” “legitimate,” and “illegitimate” are put in quotation marks at the first use, as there is no recognized, fixed definition of these terms. However, for the purposes of this paper, these terms are used as shorthand to explore the concept of legitimacy and credit mills and with the aim to propose a more formal definition of illegitimate and credit mill schools through research.

⁵ J. Yang, “Star Investigation: Slacking Off Gets High Marks at This ‘High School,’” *Toronto Star*, September 16, 2011, https://www.thestar.com/news/gta/2011/09/16/star_investigation_slacking_off_gets_high_marks_at_this_high_school.html; I. Teotonio, “Toronto Schools Make the Grade with International Students,” *Toronto Star*, September 29, 2019, <https://www.thestar.com/news/gta/2019/09/29/toronto-schools-make-the-grade-with-international-students.html>; L. Parker and N.D. Deckard, “The Market for a Public High School Degree,” *Journal of World-Systems Research* 28, no. 1 (2022): 127–45, <https://doi.org/10.5195/jwsr.2022.1012>; N. Chowdhury, “Critics Call Them ‘Credit Mills.’ But Some Students Say Private Courses Give Them the Boost They Need,” *CBC*, June 7, 2023, <https://www.cbc.ca/news/canada/students-taking-private-courses-to-boost-their-applications-despite-concern-over-credit-mills-1.6867102>.

Credit Emphasis schools are defined in “Naturally Diverse” as secondary schools that emphasize that they offer credits toward the Ontario Secondary School Diploma (OSSD), or a curriculum based on the OSSD, in such a way or to such an extent that this appears to be the school’s primary purpose or identity. Credit Emphasis schools often offer the opportunity for single-credit enrolment, charging on a per-credit basis rather than annual tuition, and they tend to enrol international students.⁶

“Naturally Diverse” did not seek to assess the legitimacy of Credit Emphasis schools. The 348 schools typed as Credit Emphasis represent about 24 percent of the K–12 independent schools in Ontario, according to the Ministry of Education’s Open Data Catalogue data as of July 2022.⁷ These schools do not appear as a distinct category in any other typology that researchers have proposed in the academic literature, and research on them is limited. They seem to have increased rapidly in number and enrolment since Ontario’s commitment to increase its recruitment of K–12 international students in the last ten years.⁸

Although this study focuses on Credit Emphasis schools, questions of legitimacy may exist for other school types. In fact, it is hoped that the legitimacy framework developed here could be applied to other schools fruitfully. In investigating the legitimacy of Credit Emphasis schools, an implicit argument is offered for maintaining the integrity of the independent-school sector in Ontario as a whole. This paper considers the roles of the state, the individual, and civil-society institutions in the funding, regulation, and delivery of quality education for students in Ontario independent schools. It concludes with policy suggestions to strengthen the role of civil society in the accountability and regulation of independent schools, and to ensure quality in education and the protection and safety of K–12 international students in Ontario.

The Concept of School Legitimacy

The concept of what makes a school a legitimate one develops over time, based on shared norms within a given society.⁹ In Ontario, large district (public) systems are the reference point for these norms, and independent schools must usually conform to or surpass the standards of district schools if they want to be viewed as legitimate. In some cases, however, independent schools choose to define themselves in sharp relief to the norms that prevail: they may offer a particular curriculum or a particular educational philosophy or pedagogical approach that means they do things differently from other schools. In other words, an appeal to legitimacy can be constructed in terms of innovation and difference from existing norms. Thus the independent-school sector makes for an interesting case study of the concept of legitimacy.

⁶ Hunt, DeJong VanHof, and Los, “Naturally Diverse,” 17.

⁷ Ontario Ministry of Education, “Private School Contact Information,” Government of Ontario, July 2022, <https://data.ontario.ca/dataset/private-school-contact-information>.

⁸ Teotonio, “Toronto Schools Make the Grade.”

⁹ S. Davies and N. Guppy, *The Schooled Society: An Introduction to the Sociology of Education*, 2nd ed. (Oxford: Oxford University Press, 2010), 154–71.

In this study, the assumption is made that the purpose of a school, as stated in its mission or vision statements, provides insight into how the school seeks to demonstrate its legitimacy. For example, a religious school might seek legitimacy within the established norms of its religious community, and a school with an arts-focused curriculum might seek legitimacy through accreditation or association with particular arts organizations.¹⁰ Particularly notable is the extent to which such schools involve civil-society institutions as partners in legitimation. An attempt to evaluate a school's legitimacy, therefore, must cast a wide net across a variety of organizational characteristics and not limit itself to assessing only the school's compliance with government regulation.

Credit Emphasis Schools within a Privatized Education Landscape

Educational pluralism, the norm in numerous other countries, is an approach to education in which the state *funds* and *regulates*, but does not exclusively *deliver*, the education.¹¹ Education is viewed as belonging exclusively neither to the realm of the individual nor to the realm of the state. Rather, civil society, the voluntary institutions that are core to a healthy democracy, plays an important role in ensuring the quality and delivery of education. Done well, educational pluralism maintains both quality and equity in educational outcomes while providing options for parents and children according to their particular needs or preferences.¹²

Educational pluralism can be conceived, then, as occupying a mediating space between the state and the individual, emphasizing the role of a variety of civil-society institutions. This space provides opportunity for choice and involvement of parents; distribution of opportunity for underserved students; integration of community organizations and social institutions, which influence school culture formation together with educators and school leaders; and accountability and quality for the government to maintain in the interests of a democratic society.

The K–12 independent sector in Ontario exhibits privatization as opposed to pluralism. Independent schools in Ontario do not receive any public funding (unlike those in each of the provinces west of Ontario, and in Quebec). They also operate within a minimal regulatory environment.¹³ Schools may operate as for-profit

¹⁰ As one example, sociologist Jeff Guhin writes about the ways in which legitimacy is channelled within evangelical Christian and Sunni Muslim schools in New York. See J. Guhin, *Agents of God: Boundaries and Authority in Muslim and Christian Schools* (New York: Oxford University Press, 2020).

¹¹ See A.R. Berner, *Pluralism and American Public Education: No One Way to School* (New York: Palgrave Macmillan, 2016).

¹² Ashley Berner makes a strong argument that educational equity and pluralism are connected, in “The Progressive Case for Educational Pluralism,” *Cardus*, 2024, <https://www.cardus.ca/research/education/perspectives-paper/the-progressive-case-for-educational-pluralism/>.

¹³ D. Van Pelt, S. Hasan, and D.J. Allison, “The Funding and Regulation of Independent Schools in Canada.” Fraser Institute, 2017, <https://www.fraserinstitute.org/sites/default/files/funding-and-regulation-of-independent-schools-in-canada.pdf>. For the history that has given rise to this situation in Ontario, see J. Farney, “Stability Amid Change: Ontario’s Religious Schools and Canada’s Regime of Secularism,” *American Review of Canadian Studies* 47, no. 1 (2017): 74–88, <https://doi.org/10.1080/02722011.2017.1284136>; R.D. Gidney, *From Hope to Harris: The Reshaping of Ontario’s Schools* (Toronto: University of Toronto Press, 1999).

businesses, or as non-profit or charitable organizations. In some cases, they partner with civil-society institutions for the delivery of the education and for funding.

The privatized system in Ontario “provides a benign, indulgent environment for public schools and an open yet somewhat hostile environment for private schools.”¹⁴ Independent schools exist parallel to and separate from the district (public) school system. The lack of public funding and minimal regulation in Ontario is a double-edged sword for school legitimacy. On the one hand, this situation can allow the sector to flourish, enabling groups of citizens to come together and innovate in the creation of educational offerings that meet or exceed what district schools can offer. On the other hand, it provides a potentially lucrative opportunity for operators of for-profit schools of low quality. (This is not to say that for-profit schools are necessarily low-quality.)

The auditor general’s report in 2013 and follow-up report in 2015 identified numerous issues in the sector.¹⁵ These reports did not make any distinctions among types of independent schools, however, and they are also now nearly ten years old. In investigating the legitimacy of Credit Emphasis schools in this province, this study grapples with the consequences of Ontario’s current choice for privatization rather than pluralism.

How does an independent school establish and demonstrate its legitimacy in the eyes of prospective students, parents, and supporters? As described in “Naturally Diverse,” many schools seek independent regulation or accountability from the communities they serve. They may join school associations, maintain charitable status that requires fiduciary responsibility to an elected board, and seek accreditation through independent agencies. However, these practices take time and expertise to establish. Newly formed independent schools may have not yet adopted some or all of these practices; this does not mean they are illegitimate schools.

Methodology

To assess the legitimacy of Credit Emphasis schools, and the possibility that some of them may be credit mills, the analogy of “predatory journals” is helpful. Within higher education, this term has arisen to describe journals whose primary purpose is not the advancement of knowledge but the payment of money in exchange for publication, with little or no regard for the quality of the work being published. Typically, such journals publish almost all articles submitted to them, do not use peer

¹⁴ D. Allison, “School Choice in Canada: Diversity along the Wild-Domesticated Continuum,” *Journal of School Choice* 9 (2015): 282–309, <https://doi.org/10.1080/15582159.2015.1029412>, p. 305.

¹⁵ Office of the Auditor General of Ontario, “Private Schools,” in *2013 Annual Report* (Toronto: Queen’s Printer for Ontario, 2013), 180–201, <https://www.auditor.on.ca/en/content/annualreports/arreports/en13/306en13.pdf>; Office of the Auditor General of Ontario, “Private Schools: Follow-Up to VFM Section 3.06, 2013 Annual Report,” in *2015 Annual Report* (Toronto: Queen’s Printer for Ontario, 2015), 634–49, <https://www.auditor.on.ca/en/content/annualreports/arreports/en15/4.06en15.pdf>.

review, and engage in little or no editorial control, thus violating many or all of the legitimacy norms that have developed for academic journals.¹⁶

The similarities between the academic publishing sector and Ontario's independent-school sector make the study and detection of predatory journals a good template for the detection of possible credit mills. Both sectors claim to exist for the dissemination of knowledge or education, which is a difficult "product" to measure and assess. Both exist in environments with minimal regulation or legislation governing their operation. Both rely on the internet to deliver their "product," either entirely or to a large extent. Both offer a pathway to a desired status: Credit Emphasis schools offer OSSD credits or courses for post-secondary education, and predatory journals offer publications that can be listed on one's résumé, which is assessed for academic promotion and tenure. Both exist within competitive environments: students who seek a university degree want to obtain OSSD credits, and academics seeking promotion and tenure want to demonstrate a record of publication. Finally, both exist within contexts in which information about the quality of the offering comes primarily from the individual school or journal itself and is difficult to externally validate.

This last characteristic presents challenges for objective research. In their discussion of the challenge of evaluating predatory journals, Kratochvíl et al. note that "there is a problem with standardization of the evaluation process and that one must not rely merely on compliance with formal criteria when evaluating a journal."¹⁷ The evaluation of independent schools is similarly complex—evaluation by a researcher external to the school may be able to determine the extent to which the school adheres to formal requirements or expectations, but not how decisions are actually made and the motivations for these decisions. To fully judge the legitimacy of any particular Credit Emphasis school, more than a checklist of legitimacy criteria would be needed. The process would include interviews with people associated with the school, and regular site visits. A full judgment of this kind lies beyond the scope of this paper.

Procedure

In selecting criteria for the legitimacy framework, a broad scope of factors was considered. The perusal of school websites as part of the earlier "Naturally Diverse" research had revealed that Credit Emphasis schools often exhibited certain anomalies, such as suspect web-search results for school names, poorly functioning website (numerous broken links and stock photos, for example), and addresses that, when viewed on Google Street View, appeared to be the location of a warehouse or other

¹⁶ L. Collister, K. Jones, and A. Jenkins, eds., "Illegitimate & Predatory Publishing: About Illegitimate & Predatory Publishing," University of Pittsburgh Library System, <https://pitt.libguides.com/predatorypublishing>; J. Kratochvíl et al., "Evaluation of Untrustworthy Journals: Transition from Formal Criteria to a Complex View," *Learned Publishing* 33, no. 3 (2020): 308–22, <https://doi.org/10.1002/leap.1299>; S. Rele, M. Kennedy, and N. Blas, "Journal Evaluation Tool," LMU Librarian Publications and Presentations, 2017, https://digitalcommons.lmu.edu/librarian_pubs/40/.

¹⁷ Kratochvíl et al., "Evaluation of Untrustworthy Journals," 319.

building that seemed unlikely to be a school. The first three sections of the framework include these factors under the headings “Web search for the school,” “School website,” and “Web search for the school location.” If the school’s URL, as given in the Open Data Catalogue, did not work (either because it was recorded incorrectly or because the school’s website had changed), a Google search was conducted to find the correct website.

The framework’s fourth section, “Characteristics of school offerings,” include characteristics pertaining to the school’s purpose. A distinction is made between the number of OSSD courses advertised by the school (which may or may not be approved as credits) and the accreditation of these courses as OSSD credits via inspection and approval by the ministry (evaluated in the fifth section).

And finally, the fifth section, “Longevity and accountability structures,” examines criteria that contribute to the legitimacy of any independent school, such as membership in a school association, longevity, and charitable status.

The researcher’s initial iteration of the legitimacy framework went through a process of peer review and was revised based on that feedback. The final framework has seventeen variables of assessment, each assigned an equal weight. A zero (0) was assigned for forms of the criterion deemed illegitimate, and a one (1) was assigned for forms deemed legitimate. (A 0.5 was assigned in some cases for forms deemed partially legitimate.) Schools with higher overall-legitimacy scores therefore are higher in legitimacy. The framework is provided in the appendix along with a detailed rationale for each variable.

The initial sample consisted of all 348 schools typed as Credit Emphasis in the earlier “Naturally Diverse” study. The sample was reduced to 272 schools by eliminating schools for which a website could not be found, that had closed since July 2022, or that the researcher judged to be franchises or duplicates of other schools.¹⁸ To determine whether schools had closed since July 2022, the researcher consulted the ministry’s list of private schools that have closed.¹⁹

A Freedom of Information request was submitted to the Ministry of Education for the latest inspection reports for forty-six schools randomly selected from the schools that were ministry-approved to offer OSSD credits and which had the lowest overall-legitimacy scores. These reports are discussed later in this paper.

The schools were also coded for the presence of school-adjacent services: tutoring, language services, and international-student services such as homestay or visa-application support. These variables were not included in the framework but were

¹⁸ A school was judged to be a franchise if it had three or more locations all using the same name and website, and each location had its own entry in the Ministry’s Catalogue. In such cases, just one of the locations was analyzed. A school was judged to be a duplicate if it was an online school for which there was a corresponding site-based school, or if a site-based school had more than one campus but did not appear to be a franchise (each location had a different name, but they shared a website).

¹⁹ Ontario Ministry of Education, “Private Schools That Have Closed,” Government of Ontario, <https://www.ontario.ca/page/private-schools-have-closed>.

collected in order to shed light on additional characteristics of Credit Emphasis schools. Results were analyzed to report the frequency of these criteria within the sample.

No single criterion should be used to confirm weak or strong legitimacy—rather, from the whole framework a more complete picture may emerge. Furthermore, there are other possible criteria that could assist in evaluating a school's legitimacy that were not ultimately included in the framework.

Limitations

There are several limitations to this research. This study relies on the self-reported data of schools in the ministry's Open Data Catalogue of 2019–20. It also relies entirely on web searches and on school websites. School websites may not be accurate representations of site-based education and may provide limited information about online education as well, since access to any online learning platforms or portals that the school uses typically requires log-in credentials. The researcher cannot view what lies behind the log-in page. Finally, this research is the work of a single researcher, providing no opportunity for verification of coding or inter-coder agreement. To ameliorate this potential deficiency, the research went through several stages of peer review, including an initial review of the project proposal and a review of data analysis and results upon completion.

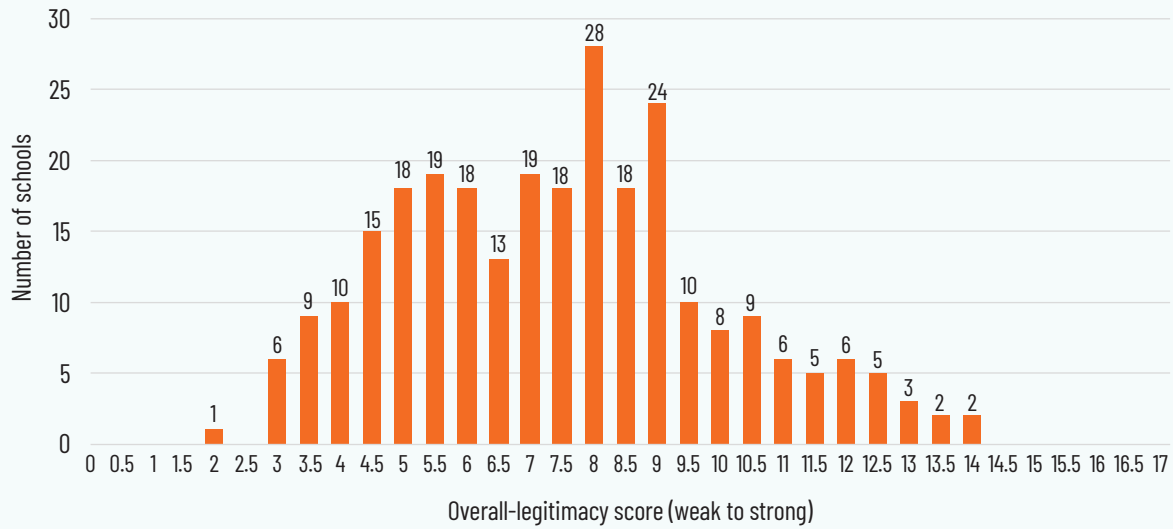
Results

As seen in figure 1, total overall-legitimacy scores of Credit Emphasis schools take the shape of a bell curve, with the highest number of schools (twenty-eight) scoring 8, the average score. The lowest score (for one school) was 2, and the highest score (for two schools) was 14.

As noted earlier, the higher the overall-legitimacy score, the higher the legitimacy. Because some schools were scored out of 16 criteria instead of 17 (for example, if the school is an internet-only school, it was not scored for facilities criteria), and because some criteria could not be assessed for some schools (resulting in a U, unknown, for that particular criterion), the raw scores were adjusted to a percent-legitimacy score. The distribution of the adjusted percent-legitimacy score for all Credit Emphasis schools is shown in figure 2.

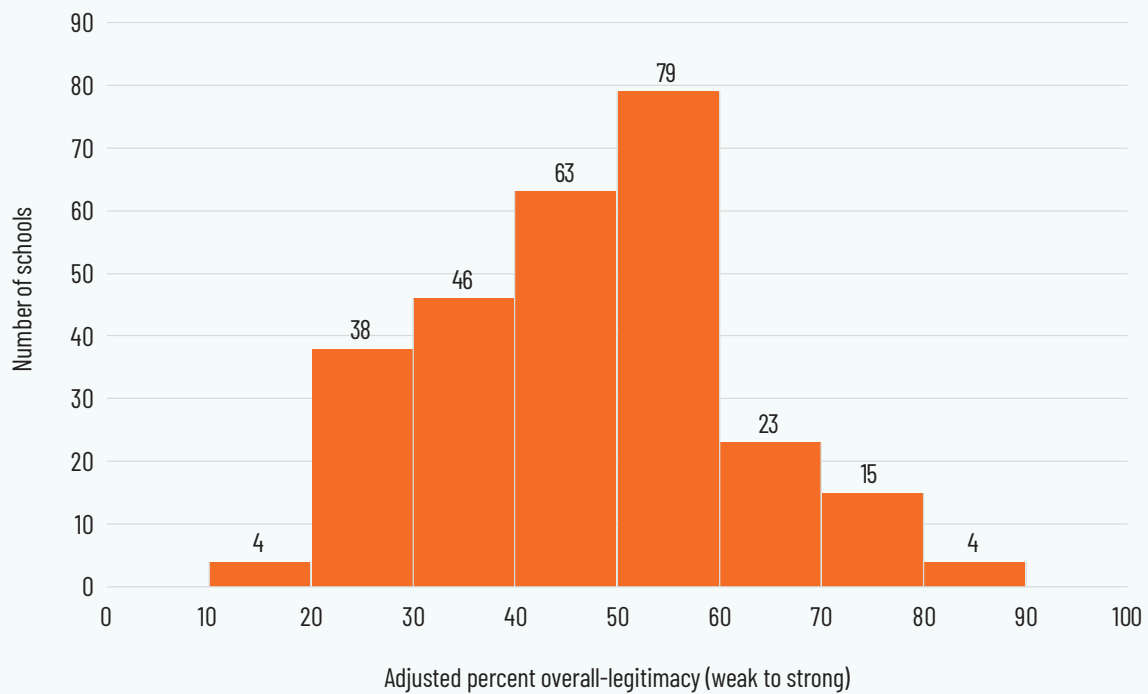
Figure 3 groups the raw scores into overall-legitimacy categories of weak (defined as a score between 0 and 5.5), moderate (a score between 6 and 11), and strong (a score between 11.5 and 17). For comparison, figure 4 shows these categories for the adjusted percent-legitimacy score. When compared with adjusted-percent scores, the raw scores show more schools in the weak category, fewer schools in the moderate category, and very similar numbers (23 and 24) in the strong category. Raw scores were used for analysis in this report.

Figure 1. Distribution of Raw Overall-Legitimacy Score of Credit Emphasis Schools, 2023



Source: Author's calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, "Private School Contact Information," Government of Ontario, April 2022; Ontario Ministry of Education, "Private Schools That Have Closed," Government of Ontario, March 2023.

Figure 2. Histogram of Adjusted Percent Overall-Legitimacy Score, Credit Emphasis Schools, 2023

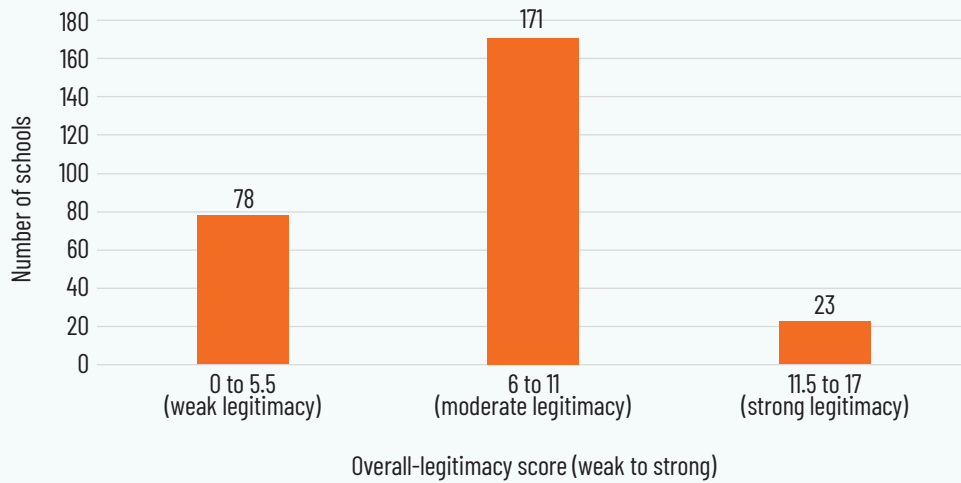


Source: Author's calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, "Private School Contact Information," Government of Ontario, April 2022; Ontario Ministry of Education, "Private Schools That Have Closed," Government of Ontario, March 2023.

1. Web Search for the School

The first section of the framework analyzes three criteria related to a web search for the school: use of the Secure Sockets Layer protocol for website security, a unique domain name, and a social-media presence. Table 1 provides the results for these criteria.

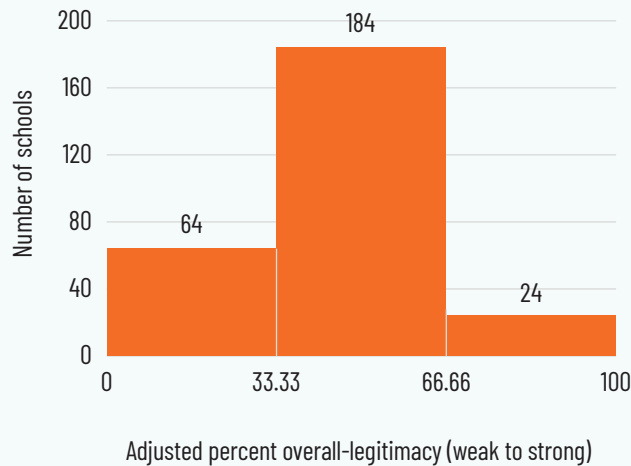
Figure 3. Raw Categorized Overall-Legitimacy Scores of Credit Emphasis Schools, 2023



Note: Revised February 2025.

Source: Author's calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, "Private School Contact Information," Government of Ontario, April 2022; Ontario Ministry of Education, "Private Schools That Have Closed," Government of Ontario, March 2023.

Figure 4. Adjusted Percent Categorized Overall-Legitimacy, Credit Emphasis Schools, 2023



Source: Author's calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, "Private School Contact Information," Government of Ontario, April 2022; Ontario Ministry of Education, "Private Schools That Have Closed," Government of Ontario, March 2023.

Two hundred and eleven schools (77.6 percent) have a website secured with the Secure Sockets Layer protocol, and 268 schools (98.5 percent) have a unique domain name. Seventy schools (25.7 percent) maintain one active social-media account, and an additional forty schools (14.7 percent) maintain more than one. For 159 schools (58.5 percent), no social-media account can be found.

All schools with a strong overall-legitimacy score use the SSL protocol for website security (figure 5). Schools with weak overall-legitimacy scores are less likely to have an active social-media account (figure 6). Of schools with moderate overall-legitimacy scores, 87 out of 171 schools (50.9 percent) do not have at least one active social-media account. In fact, out of the total 272 schools, just twelve schools with strong overall-legitimacy scores have more than one active social-media account, and twenty-seven schools with moderate overall-legitimacy scores have more than one.

Table 1. School Scores for Legitimacy Framework: Web Search for School

1. Web Search for School					
Criterion	Description		Score	Number of Schools	Percentage of Schools (%)
SSL Certificate	Is the website secure?	The website has an SSL certificate.	1	211	77.6
		The website does not have an SSL certificate.	0	59	21.7
		Unknown	U	2	0.7
		Total		272	100.0
Domain Search	Is the domain unique?	Search with another domain suffix results in a redirect, other school with the same name, or no result.	1	268	98.5
		Search for the school's name with other domain suffix(es) returns results that are not schools.	0	1	0.4
		Unknown	U	3	1.1
		Total		272	100.0
Social-Media Presence	Does the school have an active social-media presence?	The school maintains active social-media accounts on more than one platform.	1	40	14.7
		The school maintains one active social-media account.	0.5	70	25.7
		The school's website contains social-media icons or links, but they do not work, and a search for social-media accounts returns no results.	0	159	58.5
		Unknown	U	3	1.1
		Total		272	100.0

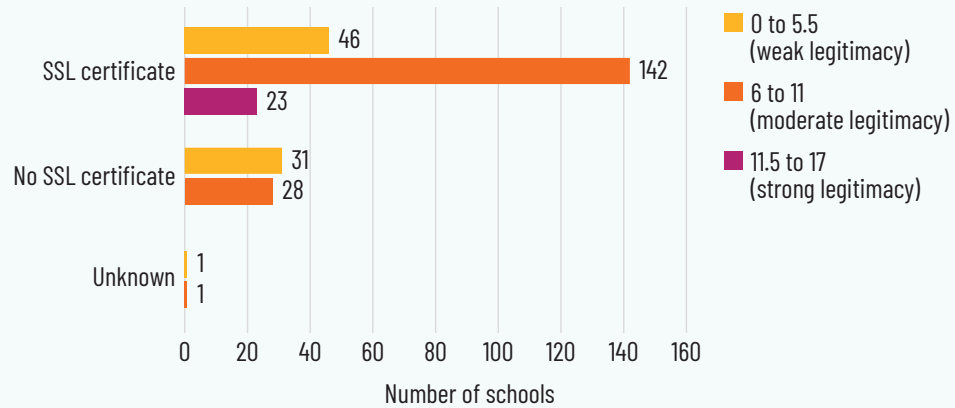
Note: Some totals may not equal 100% due to rounding.

Source: Author's calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, "Private School Contact Information," Government of Ontario, April 2022; Ontario Ministry of Education, "Private Schools That Have Closed," Government of Ontario, March 2023; school social-media profiles on Instagram, Twitter, and Facebook.

2. School Website

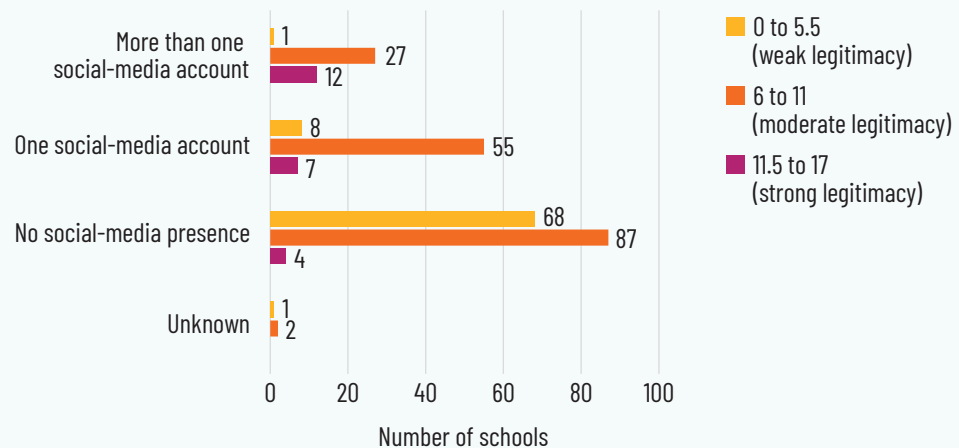
The four criteria in this section of the framework evaluate the functionality and content of the school’s website: overall functionality and informativeness (functioning links, up-to-date information, etc.), and the presence or absence of information about the owner or principal, the teachers, and the school’s education policy. Table 2 provides the number and percentage of schools for each of these criteria.

Figure 5. Association Between Overall-Legitimacy Score and Secure Socket Layer Certificate, Credit Emphasis Schools, 2023



Source: Author's calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, "Private School Contact Information," Government of Ontario, April 2022; Ontario Ministry of Education, "Private Schools That Have Closed," Government of Ontario, March 2023; school social-media profiles on Instagram, Twitter, and Facebook.

Figure 6. Association Between Overall-Legitimacy Score and Social-Media Presence, Credit Emphasis Schools, 2023



Source: Author's calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, "Private School Contact Information," Government of Ontario, April 2022; Ontario Ministry of Education, "Private Schools That Have Closed," Government of Ontario, March 2023; school social-media profiles on Instagram, Twitter, and Facebook.

Table 2. School Scores for Legitimacy Framework: School Website

2. School Website					
Criterion	Description		Score	Number of Schools	Percentage of Schools (%)
Overall Functionality	Does the school have a functional, informative website?	The school website is fully functional and informative.	1	104	38.2
		The school website is passably functional.	0.5	127	46.7
		The school website is minimally functional.	0	41	15.1
		Unknown	U	0	0.0
		Total			272
Identity of Owner and Contact Information	Does the website identify the owner, principal, or manager of the school by name and provide their contact information?	The website identifies this person by name and provides a way to contact them.	1	23	8.5
		The website does not identify this person by name, but a way to contact the school is provided.	0.5	182	66.9
		The website does not identify this person by name and does not provide a way to contact them or the school.	0	67	24.6
		Unknown	U	0	0.0
		Total			272
Educator Information	Does the website provide information about the educators?	The website provides names and credentials of the school's educators.	1	56	20.6
		The website provides names of the school's educators but does not provide their credentials.	0.5	24	8.8
		The school does not provide names or credentials of the school's educators.	0	192	70.6
		Unknown	U	0	0.0
		Total			272
Education Policy	Does the school's website provide information about education policies and make policy documents available?	The website provides information about the school's education policies. Policy documents are present and up to date.	1	53	19.5
		The website makes vague or generic reference to the school's education policies. Policy documents may be present but may not be up to date.	0.5	33	12.1
		The website does not make any reference to the school's education policies.	0	186	68.4
		Unknown	U	0	0.0
		Total			272

Note: Some totals may not equal 100% due to rounding.

Source: Author's calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, "Private School Contact Information," Government of Ontario, April 2022; Ontario Ministry of Education, "Private Schools That Have Closed," Government of Ontario, March 2023.

Fewer than half (104, or 38.2 percent) of the schools scored a 1 on website function, the score indicating a fully functional and informative website according to the definition given in the framework. Fully 168 schools (61.8 percent) have websites that were assigned a 0 or 0.5, containing such features as broken links and placeholder (template) text. Two schools' websites even contained links to online gambling sites.

The majority of the websites lacked information about the owner or principal, teachers, and education policies. Ninety-one percent (249 schools) did not identify the owner or principal and provide a way to contact them directly, though 67 percent (182 schools) provided generic contact information for the school. More than 70 percent (70.6 percent, 192 schools) did not provide any information about the educators, and 68.4 percent (186 schools) did not provide any information about the school's education policies.

Cross-tab analysis reveals that almost all schools with strong overall-legitimacy scores received a 1 for website function (figure 7). Just one of twenty-three schools (4.3 percent) with strong overall-legitimacy scores scored 0.5 on this criterion, and no school with a strong overall-legitimacy score had a 0 or U (unknown). Schools with weak overall-legitimacy scores are more likely to maintain websites with passable functionality, receiving a score of 0.5 (39 schools, 50.0 percent), or with minimal functionality, receiving a score of 0 (31 schools, 39.7 percent).

Cross-tab analysis also reveals that schools with weak overall-legitimacy scores are more likely to have no information on their websites about educators or educational policies (figures 8 and 9). Interestingly, this information is absent for the majority

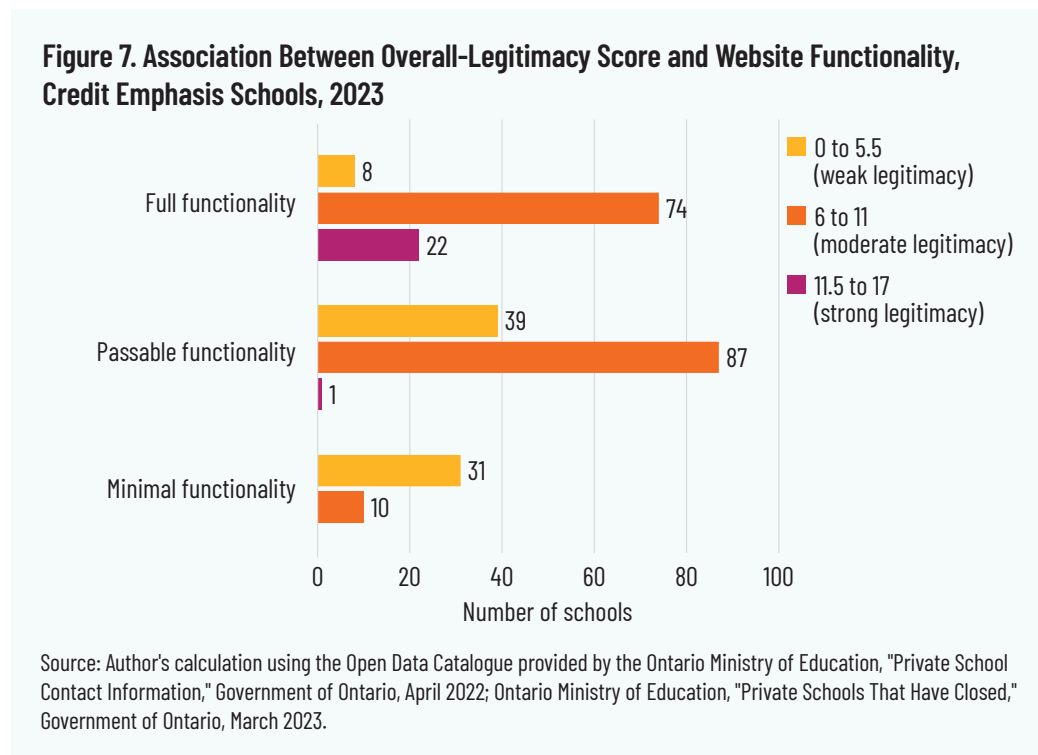
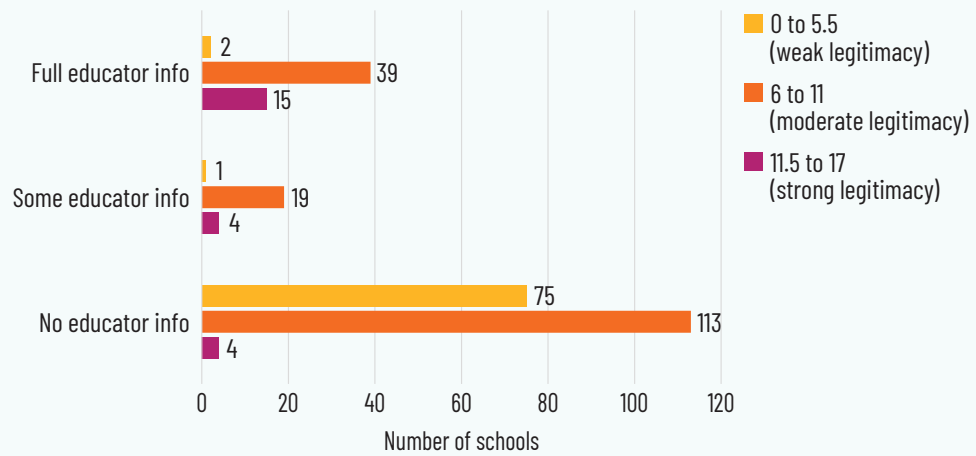
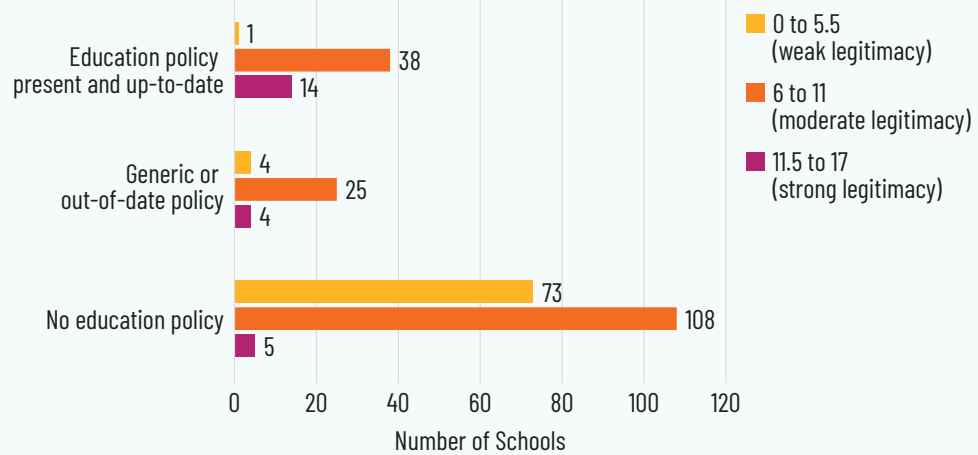


Figure 8. Association Between Overall-Legitimacy Scores and Educator Information, Credit Emphasis Schools, 2023



Source: Author's calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, "Private School Contact Information," Government of Ontario, April 2022; Ontario Ministry of Education, "Private Schools That Have Closed," Government of Ontario, March 2023.

Figure 9. Association Between Overall-Legitimacy Scores and Education Policy, Credit Emphasis Schools, 2023



Source: Author's calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, "Private School Contact Information," Government of Ontario, April 2022; Ontario Ministry of Education, "Private Schools That Have Closed," Government of Ontario, March 2023.

of Credit Emphasis schools, as 188 schools (69.1 percent) do not provide any information about the educators, and 181 schools (66.5 percent) do not provide any information about education policies.

3. Web Search for School Location

The third section of the framework analyzes criteria related to school location: the match between a Google search for location and the school's stated location, facilities deemed conducive to a learning environment, and a platform for online instruction that requires log-in credentials. Table 3 provides the results for these criteria.

For 176 schools (64.7 percent), a Google search for the school resulted in an address that matched the address provided to the ministry or matched the address given on the school website. For ninety-one schools (33.5 percent), neither of the two match, and for the remaining five schools (1.8 percent) addresses are unknown, as the school's website did not provide one.

Figure 10 demonstrates the relationship between the location-match score and the overall-legitimacy score. A school with no location match to either is more likely to fall into the weak or moderate overall-legitimacy groups.

Schools that offer both internet- and site-based education, or that offer only site-based education, were coded for facility type, using Google Street View. There were 213 schools in this group. The searches revealed that the address of most of these schools (158 schools, 74.2 percent) are of office or retail spaces, or residential spaces, compared to twenty-six schools (12.2 percent) that are institutional spaces (school buildings or church buildings) and twenty-four schools (11.3 percent) that are industrial or warehouse spaces.

Schools that offer both internet- and site-based education, or that offer only internet-based education, were assessed for presence of an online platform requiring log-in credentials. There were 219 schools in this group. One hundred and twenty of these schools (54.8 percent) have a platform requiring log-in credentials, and ninety-two schools (42.0 percent) do not. Of all online schools, 87 (39.7 percent) have approval to offer the OSSD but do not have evidence of an online platform requiring log-in credentials and therefore appear to be out of compliance with the ministry's regulations.

4. Characteristics of School Offerings

The fourth section of the framework investigates the schools' course offerings, curricular variety, and presence or absence of extracurricular activities, such as intramurals, sports teams, or other clubs or activities.

As noted earlier, all Credit Emphasis schools claim to offer OSSD courses (defined as courses that use Ontario's provincial curriculum). In addition, some Credit Emphasis schools are authorized to confer actual OSSD credits. This latter criterion is covered in the fifth section of the framework.

Ninety-one schools (33.5 percent) offer enough courses to meet the ministry’s requirement for a full diploma, which is eighteen compulsory credits and twelve optional credits, generally pursued at a rate of eight courses per grade level. Sixty-two schools (22.8 percent) offer a partial range of courses (fewer than eight courses per grade level). Sixty-eight schools (25.0 percent) offer just one or two courses (table 4).

As for curricular variety, about half of the schools offer courses in more than two subject areas (134 schools, 49.3 percent). Sixty-seven schools (24.6 percent) offer courses in just one or two subject areas, typically English, math, science, or technology.

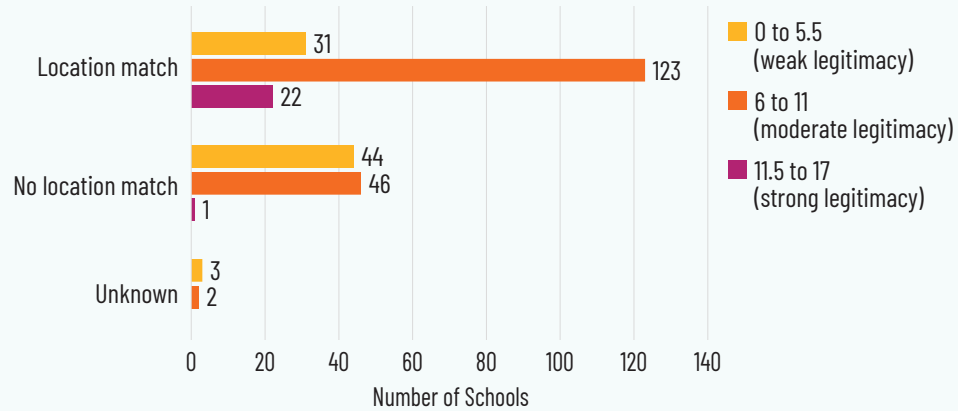
Table 3. School Scores for Legitimacy Framework: Web Search for School Location

3. Web Search for School Location					
Criterion	Description		Score	Number of Schools	Percentage of Schools (%)
Location Match	Does a Google search for the school’s location match the address given on the school’s website or provided in the Open Data Catalogue?	A Google search for the location of the school matches the contact information on the website or in the Catalogue.	1	176	64.7
		A Google search for the location of the school does not match the information on the website or in the Catalogue.	0	91	33.5
		Unknown	U	5	1.8
		Total		272	100.0
Facilities	Does the school’s address suggest that the site-based education occurs in facilities that are conducive to a learning environment?	A Google search demonstrates that the school is located in an institutional space.	1	26	12.2
		A Google search demonstrates that the school is located in an office, retail, or residential space.	0.5	158	74.2
		A Google search demonstrates that the school is located in an industrial space or a space whose nature cannot be determined.	0	24	11.3
		Unknown	U	5	2.3
		Total		213	100.0
Online Platform	Does the school’s website include a portal to an online learning platform requiring log-in credentials?	The website includes a portal requiring log-in credentials to access.	1	120	54.8
		The website does not include a portal, or the portal does not require log-in credentials to access.	0	92	42.0
		Unknown	U	7	3.2
		Total		219	100.0

Note: Some totals may not equal 100% due to rounding.

Source: Author’s calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, “Private School Contact Information,” Government of Ontario, April 2022; Ontario Ministry of Education, “Private Schools That Have Closed,” Government of Ontario, March 2023.

Figure 10. Association Between Overall-Legitimacy Score and Location Match, Credit Emphasis Schools, 2023



Source: Author's calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, "Private School Contact Information," Government of Ontario, April 2022; Ontario Ministry of Education, "Private Schools That Have Closed," Government of Ontario, March 2023.

The majority of the schools do not offer extracurricular activities (that is, no mention of them exists on the school's website or in its social-media accounts). Just thirty-four schools (12.5 percent) offer such activities to students.

Figures 11 and 12 reveal that schools with a strong overall-legitimacy score are more likely to offer a full range of OSSD courses and a variety of curricular options. Schools with a weak overall-legitimacy score are more likely to offer just one or two OSSD courses, or focus in just one subject area.

5. Longevity and Accountability Structures

The final section of the framework examines longevity and accountability: length of existence, approval to grant OSSD credits, membership in a school association, and charitable status. Table 5 provides the results for these criteria. This is the only section of the framework that assesses some form of accountability to a third party. On this basis, these criteria arguably deserve greater weight than others within the framework. However, there is little variation in the schools' scores for these criteria, and a weighted decision-making process was not used in order to better understand the variation that might exist in other factors.

Of the 272 schools, the largest number (123 schools, or 45.2 percent) have been in existence for fewer than five years. One hundred and five schools (38.6 percent) are between five and ten years old (begun some time between 2013 and 2018). Just forty-four schools (16.2 percent) have been in existence more than ten years—that is, since at least 2012. It should be noted that since it is possible for schools that have had their identification numbers removed to reapply for a new identification number in a subsequent year under a different name, it is not easy to discern whether these data represent a continual turnover of existing schools or the addition of new schools, though the sector overall has shown growth.

A weak overall-legitimacy score is associated with more recently established schools (figure 13). Just two schools with a weak overall-legitimacy score are more than ten years old. This association may be due to inexperience and a lack of knowledge of legitimacy criteria, or, as noted above, it may be due to the non-compliance of schools that have reopened under a new name. Discerning this difference is beyond the scope of this research project.

Among schools with a strong overall-legitimacy score, twenty-one of twenty-three (91.3 percent) are more than five years old. Of schools that are more than ten years old, thirteen of twenty-three (29.5 percent) have a strong overall-legitimacy score, twenty-nine schools (65.9 percent) have a moderate overall-legitimacy score, and two schools (4.5 percent) have a weak overall-legitimacy score.

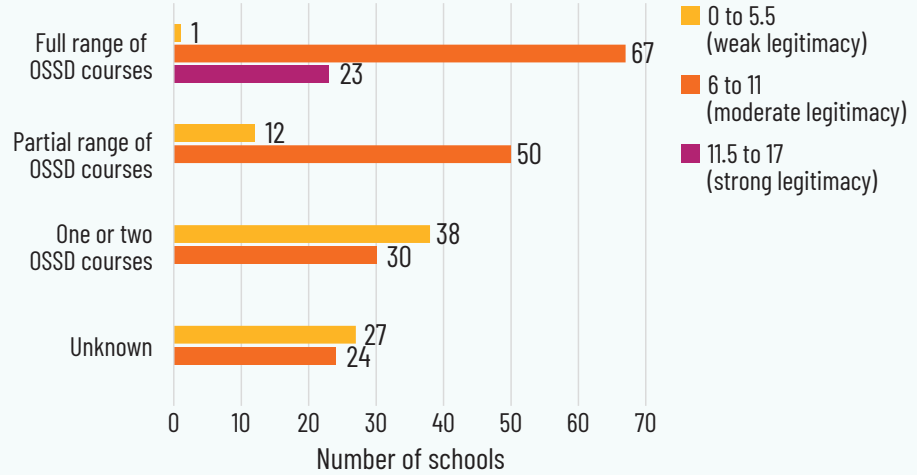
Table 4. School Scores for Legitimacy Framework: Characteristics of School Offerings

4. Characteristics of School Offerings					
Criterion	Description		Score	Number of Schools	Percentage of Schools (%)
Course Offerings	Does the school offer a full range of courses toward OSSD completion?	The school offers a full range of courses.	1	91	33.5
		The schools offers a partial range of courses.	0.5	62	22.8
		The school offers one or two courses per grade level offered.	0	68	25.0
		Unknown	U	51	18.8
		Total			272
Curricular Variety	Does the school offer courses in a variety of subject areas?	The school offers courses in more than two subject areas.	1	134	49.3
		The school offers courses in one or two subject areas.	0	67	24.6
		Unknown	U	71	26.1
		Total			272
Extracurricular Activities	Does the school offer extracurricular activities?	The school offers extracurricular activities.	1	34	12.5
		The school does not offer extracurricular activities.	0	236	86.8
		Unknown	U	2	0.7
		Total			272

Note: Some totals may not equal 100% due to rounding.

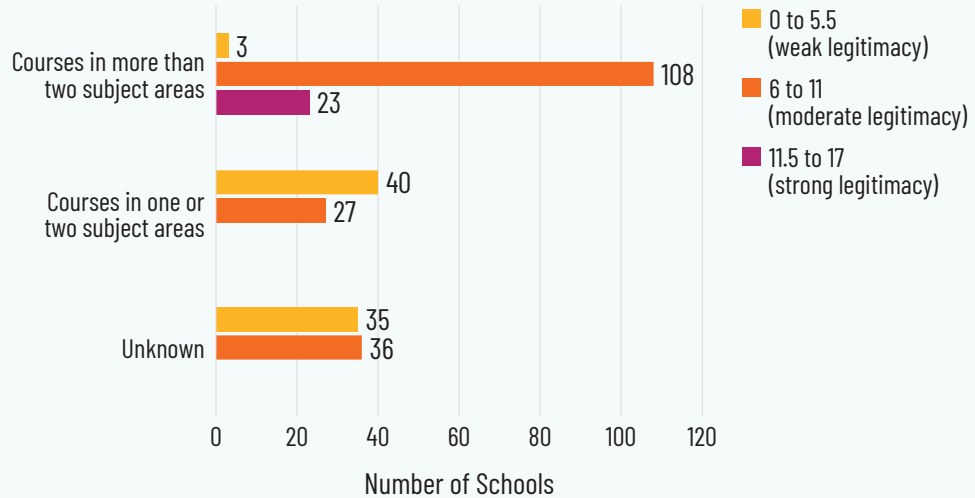
Source: Author's calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, "Private School Contact Information," Government of Ontario, April 2022; Ontario Ministry of Education, "Private Schools That Have Closed," Government of Ontario, March 2023.

Figure 11. Association Between Overall-Legitimacy Score and Number of OSSD Courses Offered, Credit Emphasis Schools, 2023



Source: Author's calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, "Private School Contact Information," Government of Ontario, April 2022; Ontario Ministry of Education, "Private Schools That Have Closed," Government of Ontario, March 2023.

Figure 12. Association Between Overall-Legitimacy Score and Curricular Variety, Credit Emphasis Schools, 2023



Source: Author's calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, "Private School Contact Information," Government of Ontario, April 2022; Ontario Ministry of Education, "Private Schools That Have Closed," Government of Ontario, March 2023.

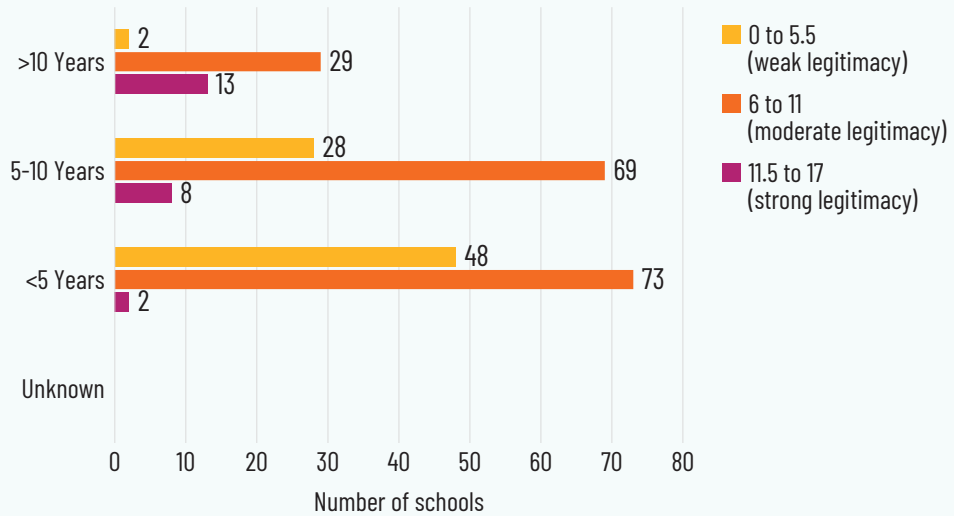
Table 5. School Scores for Legitimacy Framework: Longevity and Accountability

5. Longevity and Accountability					
Criterion	Description		Score	Number of Schools	Percentage of Schools (%)
Longevity	How long has the school existed?	The school has existed for more than ten years.	1	44	16.2
		The school is between five and ten years old.	0.5	105	38.6
		The school is less than five years old.	0	123	45.2
		Unknown	U	0	0.0
		Total			272
School Association	Is the school a member of a school association?	The school is a member of a school association.	1	13	4.8
		The school is not a member of a school association.	0	259	95.2
		Unknown	U	0	0.0
		Total			272
OSSD Credits	Has the Ministry of Education authorized the school to grant OSSD credits?	The school has been authorized to grant OSSD credits	1	251	92.3
		The school is undergoing application to grant OSSD credits.	0.5	8	2.9
		The school has not applied or is not authorized to grant OSSD credits.	0	13	4.8
		Unknown	U	0	0.0
		Total			272
Charitable Status	Is the school (or entity that owns the school) a registered charity with the Government of Canada?	The school (or entity that owns the school) is listed as a registered charity.	1	0	0.0
		The school (or entity that owns the school) is not listed as a registered charity. (It is possible that the school is listed as a registered charity under another name.)	0	272	100.0
		Unknown	U	0	0.0
		Total			272

Note: Some totals may not equal 100% due to rounding.

Source: Author's calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, "Private School Contact Information," Government of Ontario, April 2022 and November 2019; Ontario Ministry of Education, "Private Schools That Have Closed," Government of Ontario, March 2023; Government of Canada, "List of Charities and Certain Other Qualified Donees—Advanced Search", March 2023.

Figure 13. Association Between Overall-Legitimacy Score and Longevity, Credit Emphasis Schools, 2023



Source: Author's calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, "Private School Contact Information," Government of Ontario, April 2022; Ontario Ministry of Education, "Private Schools That Have Closed," Government of Ontario, March 2023.

Just thirteen schools (4.8 percent) maintain membership in a school association.²⁰ Of these, five have a strong overall-legitimacy score, seven have a moderate overall-legitimacy score, and one has a weak overall-legitimacy score (figure 14).

Two hundred and fifty-one schools (92.3 percent) have ministry approval to confer OSSD credits and are therefore subject to ministry inspections. Interestingly, there does not appear to be a connection between overall-legitimacy score and approval to confer OSSD credits: approximately equal proportions of schools with strong, moderate, and weak overall-legitimacy scores have this approval (figure 15).

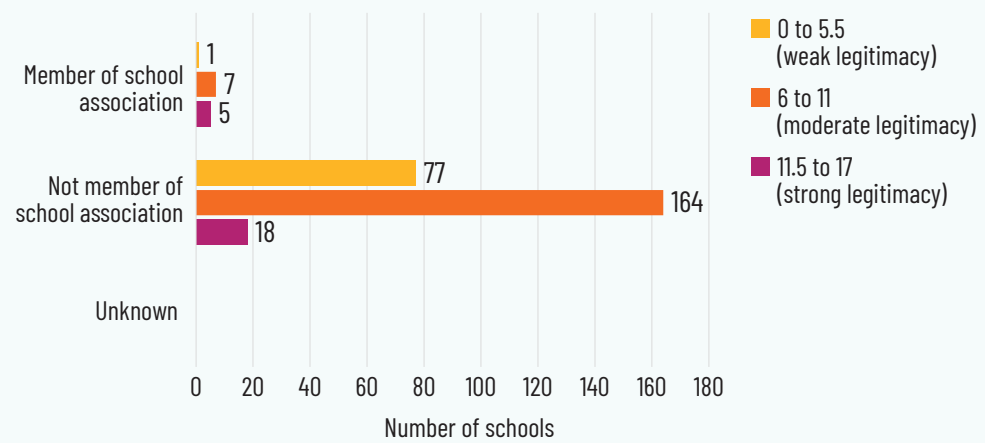
Finally, table 5 also shows registered-charity status. No school was identified as a registered charity. While some may be non-profit organizations that are not registered charities, most appear to be for-profit businesses.

6. School-Adjacent Services

Many of the schools provide adjacent services such as tutoring, English as a second language (ESL) instruction, language tests, and other services for international students such as homestay and support with visa applications. This study assumes that the presence or absence of such services does not have a direct impact on the school's legitimacy and therefore these services are not included in the legitimacy framework. Yet this information can provide insight into the characteristics of Credit Emphasis schools and the student populations they serve.

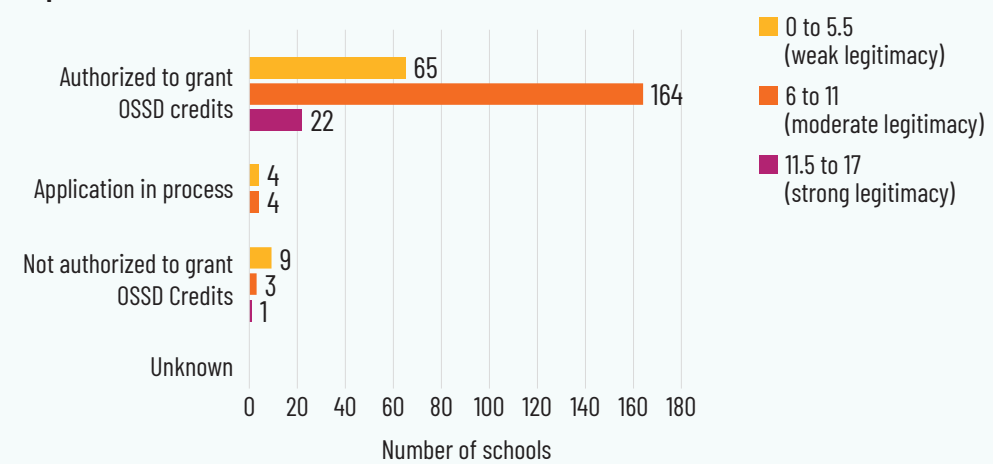
²⁰ Each school's membership in a school association was determined in the earlier research. See Hunt, DeJong VanHof, and Los, "Naturally Diverse."

Figure 14. Association Between Overall-Legitimacy Score and School Association, Credit Emphasis Schools, 2023



Source: Author's calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, "Private School Contact Information," Government of Ontario, April 2022; Ontario Ministry of Education, "Private Schools That Have Closed," Government of Ontario, March 2023.

Figure 15. Association Between Overall-Legitimacy Score and OSSD Authorization, Credit Emphasis Schools, 2023



Source: Author's calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, "Private School Contact Information," Government of Ontario, April 2022; Ontario Ministry of Education, "Private Schools That Have Closed," Government of Ontario, March 2023.

Table 6 presents the number of schools that provide school-adjacent services.

Fully 204 of 272 schools (75 percent) provide international services such as student visas, homestay, or guardianship, or engage in formal recruitment of international students through recruiting agents. The provision of tutoring is less frequent than are services associated with the specific needs of international students. Fifty-three schools (19.5 percent) provide fee-based tutoring services in addition to course curriculum, whereas just under half of the schools (120 schools, 44.1 percent) provide ESL courses and/or language-testing services.

Figures 16 through 18 show the relationship between the overall-legitimacy score and the presence of school-adjacent services. The presence of these services does not appear to predict or be associated with the overall-legitimacy score. International-student services are present in a majority of schools, whether they have weak, moderate, or strong overall legitimacy.

Inspection Reports

Schools approved to offer credits toward the OSSD are subject to more government regulation than are other independent schools in the province: they undergo biannual inspection by the ministry, a process that includes interviews with teachers, examination of curriculum, and inspection of online course offerings.²¹ The schools must pay a fee for inspection, though this fee was suspended during the pandemic. The policy document for inspection is robust. Anecdotal reports from non-Credit Emphasis school principals known to this researcher suggest that the process is extensive and thorough.²² It is important to note, however, that these inspections focus only on assessing whether the school is fulfilling the ministry's requirements regarding educational policies and curriculum. The legitimacy framework applied in this study assesses additional criteria.

To strengthen understanding of the inspection and approval of OSSD credit-granting within these schools, a Freedom of Information request was filed with the ministry for the most recent inspection reports of forty-six schools randomly selected from those approved to offer OSSD credits and which had the lowest overall-legitimacy scores. These inspections took place between the fall of 2020 and the spring of 2023. Student enrolment at these schools at the time of inspection is shown in figure 19; most students are enrolled in grade 12 courses.

The ministry requires inspectors to be qualified as supervisory officers within the ministry and to undergo training in the requirements and conducting of inspection visits. Inspections normally include interviews with the principal or administrator

²¹ Ontario Ministry of Education, "Private Schools: Policy and Procedures Manual," Government of Ontario, 2013, 115, <https://files.ontario.ca/edu-private-schools-policy-procedures-manual-2013-en-2021-11-25.pdf>.

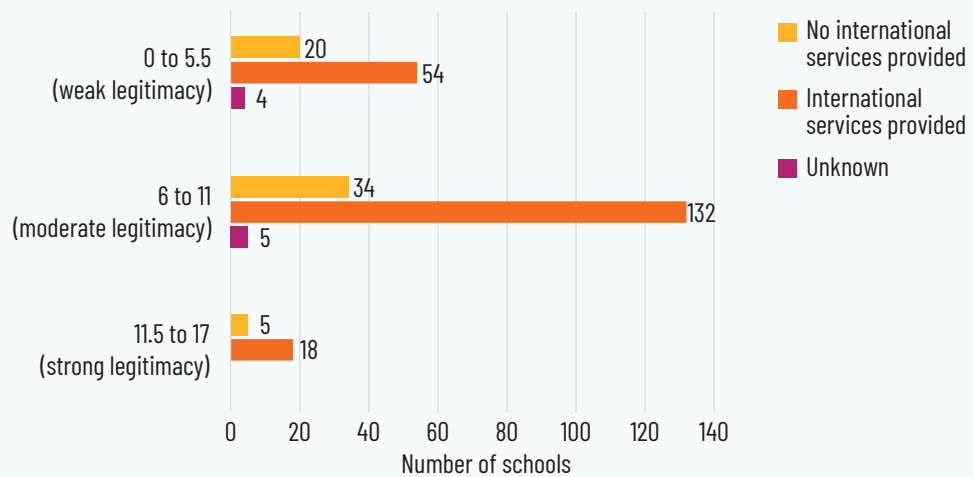
²² Private correspondence suggests that independent-school principals feel that "inspectors have high expectations and are thorough in their work. They are ideologically committed to the Ministry's approach to evaluation and assessment and expect teachers to be fully implementing this approach." They characterized their relationship with the ministry branch as mainly positive and responsive to concerns, though sometimes communication is challenging.

Table 6. Frequency of School-Adjacent Services, Credit Emphasis Schools, 2023

School Adjacent Services				
Service	Description		Number of Schools	Percentage of Schools (%)
International Services	Does the school offer other international student services (visa application support, homestay services)?	No	68	25.0
		Yes	204	75.0
		Total	272	100.0
English as a Second Language (ESL)	Does the school offer ESL courses for an additional cost?	No	152	55.9
		Yes	120	44.1
		Total	272	100.0
Tutoring	Does the school offer tutoring services for an additional cost?	No	219	80.5
		Yes	53	19.5
		Total	272	100.0

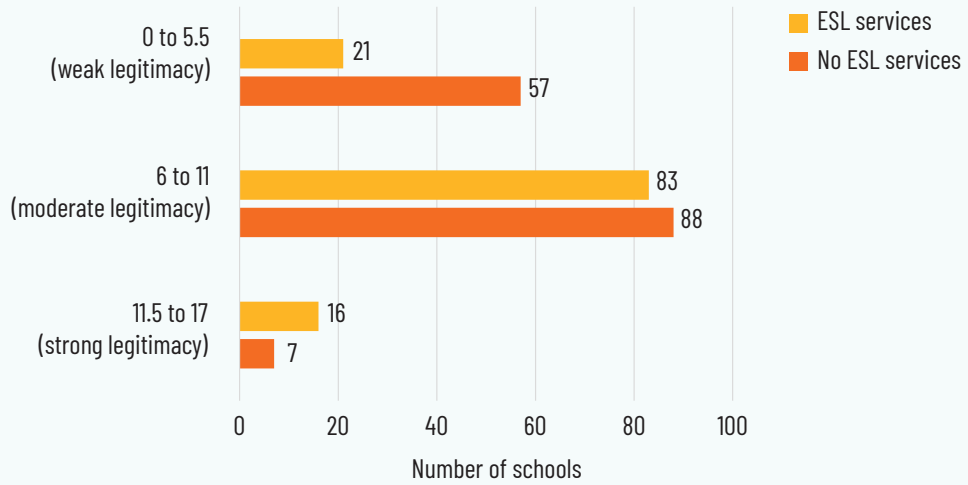
Source: Author's calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, "Private School Contact Information," Government of Ontario, April 2022; Ontario Ministry of Education, "Private Schools That Have Closed," Government of Ontario, March 2023.

Figure 16. Association Between Overall-Legitimacy Score and International Services Provided, Credit Emphasis Schools, 2023



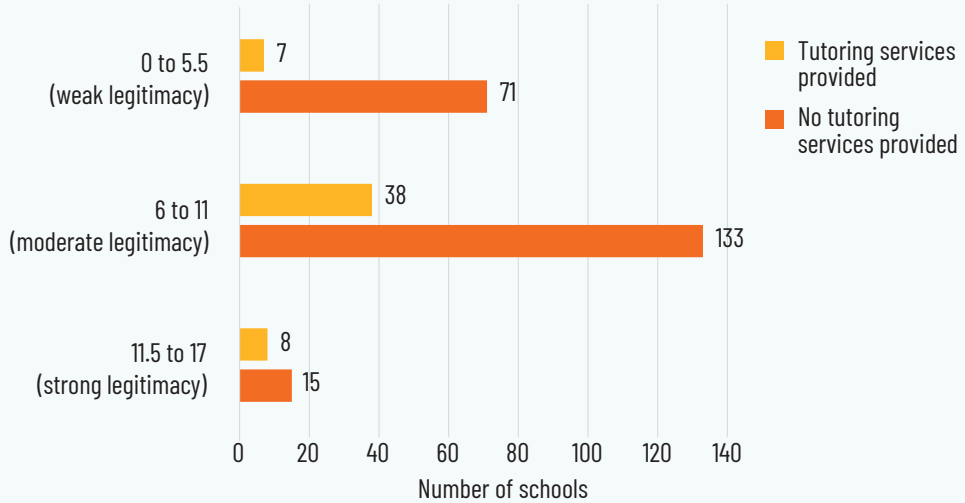
Source: Author's calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, "Private School Contact Information," Government of Ontario, April 2022; Ontario Ministry of Education, "Private Schools That Have Closed," Government of Ontario, March 2023.

Figure 17. Association Between Overall Legitimacy Score and ESL Services Provided, Credit Emphasis Schools, 2023



Source: Author's calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, "Private School Contact Information," Government of Ontario, April 2022; Ontario Ministry of Education, "Private Schools That Have Closed," Government of Ontario, March 2023.

Figure 18. Association Between Overall Legitimacy Score and Tutoring Services Provided, Credit Emphasis Schools, 2023

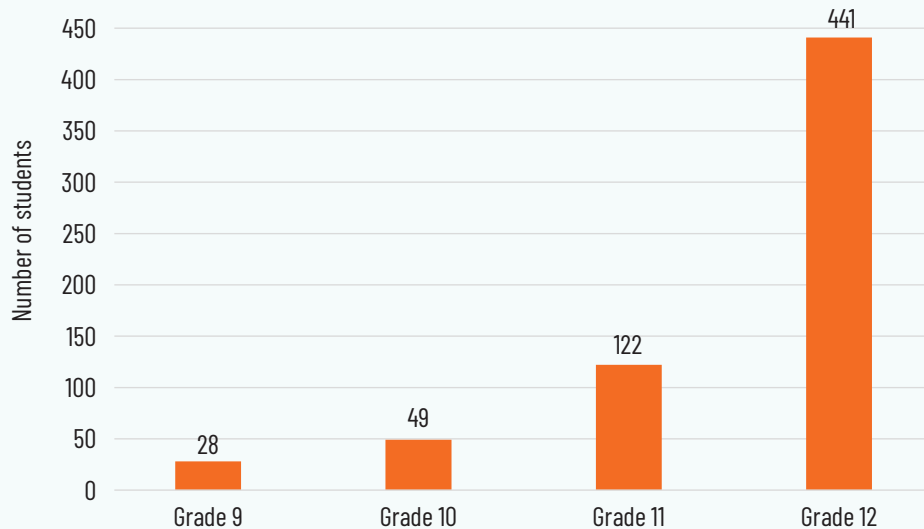


Source: Author's calculation using the Open Data Catalogue provided by the Ontario Ministry of Education, "Private School Contact Information," Government of Ontario, April 2022; Ontario Ministry of Education, "Private Schools That Have Closed," Government of Ontario, March 2023.

of the school, observance of a class, interviews with educators, and inspection of curriculum material. Due to the COVID-19 pandemic, many of the inspections were conducted virtually, which may have limited inspectors' ability to be as thorough as they might normally be. In some cases, inspectors could not view full Ontario Student Records if these were kept only on paper, due to the lack of in-person inspection.

Reports contain basic information about the school, the date and results of previous inspections, and information about the school's academic policies and practices, such as its course calendar, attendance policy, and policy on plagiarism and cheating. The inspector collects evidence of practices by means of classroom observation and conversation with the school leader or principal. The report describes the evidence of compliance with evaluation practices found in Ontario's policy document "Growing Success: Assessment, Evaluation, and Reporting in Ontario Schools."²³ The final section of the report evaluates the school's compliance with ministry policies about the recording, storage, and security of the Ontario Student Record and Ontario Student Transcript, and compliance with reporting of statistical data to the ministry as required by the *Education Act*. A time frame is set for the subsequent inspection. This can be scheduled within the same school year, set for the subsequent school year, or, if there are few concerns, set for the standard biannual schedule.

Figure 19. Total (Combined) Enrolment in Schools for which Inspection Reports were Received, at the Time of Inspection



Source: Ontario Ministry of Education, calculated from inspection reports provided to author.

Note: For privacy reasons, the Ministry of Education withholds enrolment data that falls below 10 students in a grade. In these cases the enrolment is counted as at least one student.

²³ Ontario Ministry of Education, "Growing Success: Assessment, Evaluation, and Reporting in Ontario Schools," 2010, <https://www.edu.gov.on.ca/eng/policyfunding/growsuccess.pdf>.

Inspection reports sort the feedback for the school into “issues,” which the inspector deems to be more urgent for correction, and “recommendations,” which are less urgent. Of the forty-six schools, twenty-eight received feedback with one or more issue noted, and thirty-nine received feedback with one or more recommendation. This researcher’s informal qualitative assessment of the comments associated with these issues and recommendations reveals that the most common areas of concern are assessment and evaluation practices, and attendance and course hours.

Most comments are about the need to improve assessment and evaluation practices, with an emphasis on understanding and following the practices adopted by Ontario in 2010 in the policy document “Growing Success.” Here are some examples of the comments provided:

“There is limited evidence in the courses reviewed that student achievement for evaluation is collected over time using observations, conversations, and products.”

“The final evaluation in [course code] did not allow the student an opportunity to demonstrate comprehensive achievement of the overall expectations for the course at the appropriate grade level.”

“Some courses do not provide opportunities for students to demonstrate their full range of learning[,] in that data . . . are not collected in an accountable manner.”

“It is recommended that the principal ensure that students are provided multiple opportunities to demonstrate the full range of their learning.”

“It is recommended that the principal review the definition of the achievement categories in the relevant Ontario curriculum documents . . . to avoid mark inflation.”

In some cases, inspectors were not able to view final examinations:

“The inspector was unable to view the results of any final exams. It is recommended that the principal ensure that the final evaluation demonstrates comprehensive achievement of the overall expectations for the course.”

One of the requirements for approval to grant OSSD credits is that course delivery include 110 hours of instruction. Schools must track the number of instructional hours per course, to ensure that this requirement is met. It appears that in some schools this requirement is not being met:

“The principal will revise the course delivery expectations to ensure that 110 instructional hours are scheduled and documented by teachers and students.”

“The course will need to be extended to provide students with the opportunity to complete 110 hours of instructional time and to complete assessments of learning.”

“The school does not have a clear definition of what constitutes attendance in an on-line environment.”

Inspectors also had concerns about inaccurate policy documents or the maintenance of accurate student records:

“The school does not have an Ontario Student Records policy and has not established OSRs for each student enrolled.”

“It is recommended that the principal review all Course of Study outlines to ensure accuracy of information[,] as some elements appear to be copied from another school’s documentation.”

“There is no indication in either the school course calendar or in the courses of study about how late and missing assignments will be handled.”

In September 2023, the ministry updated its guidelines on the denial and revocation of schools’ authority to grant OSSD credits.²⁴ However, the language in the guidelines remains vague. It states that denial or revocation can occur when schools “do not meet ministry requirements.” Examples of failure include “credit granted for a course scheduled for less than 110 hours,” “diploma granted without completion of all requirements,” and “failure to comply with ministry requirements in delivering curriculum expectations.”²⁵

Additional research using subsequent inspection reports would be helpful to gain a fuller understanding of the inspection process. How frequent is follow-up and accountability for schools that are cited for not complying with ministry requirements? Out of the forty-six schools for which inspection reports were received, only four had no issues or recommendations listed for follow-up. Forty of the schools had at least one recommendation listed, and twenty-eight had at least one issue for follow-up. However, just twelve schools were highlighted for a subsequent inspection sooner than the standard biannual time frame. It is unclear what the process is for determining whether a school requires an inspection sooner than the standard two years (if, for example, x number of issues or recommendations are identified), or whether this decision is left to the discretion of the inspector.

It is also unclear what happens if a school’s credit-granting authority is revoked. Can an operator simply apply to reopen under a different name? While the recently implemented and updated policy for the denial and revocation of the authority to grant credits provides some guidance, questions remain. Indeed, the fact that the

²⁴ Ontario Ministry of Education, “Policy and Procedure: Denial and Revocation of the Authority to Grant Credits,” September 2023, <https://www.ontario.ca/files/2023-09/edu-denial-revocation-authority-grant-credits-2022-2023-en-2023-09-19.pdf>.

²⁵ Ontario Ministry of Education, “Policy and Procedure,” 2–4, 6.

policy was recently updated implies that problems exist. The requirement to “return any unused/blank OSSDs, regardless of whether they have the current or a previous minister’s signature” suggests that not all schools return unused OSSDs, leaving room for these OSSDs to be granted inappropriately. Indeed, this issue has been noted previously by the auditor general.²⁶

Toward a Profile of an “Illegitimate” School

The results of applying the legitimacy framework reveal that some characteristics are more common than others among Credit Emphasis schools with weak overall-legitimacy scores. For example, almost all schools that had weak overall-legitimacy scores had no social-media presence, and most did not have good website functionality. They frequently did not list educator information or education policy on their website, tended to offer less than a full set of OSSD credits or courses, and frequently provided courses in just one or two subject areas. They tended to be schools under ten years old and did not maintain membership in a school association. They were not registered charities but operated as businesses.

It remains challenging, however, to predict a school’s level of overall legitimacy based on a small number of characteristics from the framework. Consider the following profiles of three actual Ontario schools (renamed for the purpose of anonymity) that the ministry has approved to offer OSSD credits. Each of them has weak overall legitimacy based on the framework offered in this paper, but each has its own mix of weak scores across the seventeen variables.

School A

School A offers math courses for high school students. Its website states that it offers three evening math courses. While this school scores well on website security and domain-search criteria, it scores poorly on social-media presence and website functionality. Icons for social media are present but do not link to any actual social-media accounts. The website has not been updated since 2021. (This is the last year stated anywhere on the website.)

Generic contact information is provided on the home page. There is no other contact information provided on the website. It does not display any information about its educators or its educational policy. Since it focuses on mathematics, it does not offer the full range of OSSD courses. It does not appear to offer any extracurricular activities.

It is recently established (less than three years old), is not a member of a school association, and is not a registered charity. Its inspection report identifies a variety of issues and recommendations, including the recommendation that “the principal

²⁶ Ontario Ministry of Education, “Policy and Procedure,” 6; Office of the Auditor General of Ontario, “Private Schools: Follow-Up.”

ensure that students are provided multiple opportunities to demonstrate the full range of their learning.”

It does not offer any school-adjacent services and does not appear to market its courses to international students. The school charges by the credit.

This school has an overall-legitimacy score of 3.

School B

School B markets itself as an “international school” offering OSSD courses. This school scores poorly on social-media presence and website functionality. Upon initial perusal, its website seems to offer a comprehensive repository of information, but further exploration reveals that most links are broken or loop back to a “Contact Us” page, prompting users to provide personal information. While it has a drop-down menu with fields for “Teachers” and “Principal,” these lead to empty pages.

Its website displays photos of a large historical building that is not present at the address provided to the ministry. Instead, a Google search suggests that this school leases space in an office tower.

The website provides no information about educational policy, courses offered, or extracurricular activities but does provide detailed information about by-the-credit payment options and international-student services, such as fees for homestay, custodianship, and student-visa applications. It also offers testing services for English language learners.

The school is less than three years old, is not a member of a school association, and is not a registered charity. The address listed is the same as that of another school (that is, in the ministry’s catalogue there are two schools, each with its own name, and they use the same address).

The inspection report includes the recommendation that “the principal will revise the course delivery expectations to ensure that 110 instructional hours are scheduled and documented by teachers and students.”

This school has an overall-legitimacy score of 4.5.

School C

School C offers about twenty math, science, English, business, and art courses, mostly at the grade 11 or 12 level. It does not maintain a secure website, and many features of its website are incomplete or promise information that the links do not actually deliver.

This school scores poorly in social-media presence and in website function. There is no information discernible about the courses offered, apart from course codes listed; there is also no information provided about fees. Most concerningly, the home

page contains links to websites promoting online-gambling strategies, and it lists its partner and main sponsor as a site providing casino reviews. “Read below about how to play and win at online casinos,” the school site suggests.

The contact information provided is generic, with no indication of the name or qualifications of the principal or educators, and the school website does not provide information on its education policies. The school is less than three years old and is not a member of a school association or listed as a registered charity.

The inspection report contains requirements to correct incomplete information and the stipulation that “the principal will ensure that students are provided with more opportunities to demonstrate their learning through observations and conversations.”

This school has an overall-legitimacy score of 4.

Discussion

Educational Pluralism, Regulation, and Legitimacy

The results of this study suggest that a robust legitimacy framework using a broad range of criteria may help to identify possible credit mills among the Credit Emphasis independent schools in Ontario.

The ministry’s inspection of schools that are approved to offer OSSD credits focuses on areas within its purview: the delivery, content, and assessment of curriculum and associated educational policies. (Remember that not all independent schools that are approved to offer OSSD credits are in the Credit Emphasis group, the group that is the focus of this study.) The forty-six inspection reports that were reviewed suggest that concerns often exist regarding the academic quality of Credit Emphasis schools and their degree of adherence to ministry requirements.

The criteria within the legitimacy framework presented here cast a broader net than the ministry’s inspections do, and raise additional concerns. Some of these concerns appear to have been the target of the ministry’s updated policy for the denial and revocation of the authority to grant credits. Since this policy was last updated in September 2023, its implementation is recent and ongoing, and resolution of some concerns may increasingly become apparent as the policy is applied.

Since Ontario does not distribute public funds to independent schools and thus does not regulate them as closely as, for example, is the case in Alberta, civil-society institutions play an important role in the accountability and regulation of independent schools. School associations provide their member schools with guidance in best practices in governance, operations, management, and fiscal matters. They offer leadership and professional-development opportunities for educators,

and often provide school-quality assessments or leadership-evaluation protocols.²⁷ Some associations, such as the Canadian Accredited Independent Schools, are also accrediting bodies, requiring schools to undergo an extensive accreditation process before membership in the association is granted.²⁸ Membership within school associations, or the involvement of a specific community or religious organization in internal forms of accountability, therefore, provide an alternative pathway to ensuring that independent schools maintain high-quality educational standards and work toward equitable opportunities and outcomes for students. Indeed, many secondary independent schools in Ontario undergo quality assurance both through school association membership *and* through the ministry's course-level inspections. District (public) schools, on the other hand, do not undergo such course-level or classroom inspections, nor is it apparent that they engage in whole-school assessment. While district school boards maintain strategic action plans, it is difficult to find up-to-date versions of these plans, let alone clear accountability for them.²⁹ Education Quality and Accountability Office (EQAO) testing is perhaps the only form of accountability for education quality in district schools.

This study provides an in-depth look at a subset of Ontario's diverse landscape of independent schools, schools that were typed as Credit Emphasis in previous Cardus research. It reveals that some of these schools may be less-than-legitimate educational enterprises. The majority of other independent schools in the province, which the previous research typed as Religious, Special Emphasis, or Top Tier schools, likely meet or exceed the legitimacy criteria proposed in this paper, though this analysis was not performed. The Ontario government should prioritize the enforcement of existing regulatory mechanisms, particularly for Credit Emphasis schools.

The diversity of the Ontario independent school landscape is in part a product of the low regulatory barriers to entry and the relative ease with which it is possible to start a new school. The result is a broad, innovative landscape of educational options. However, this study examines some of the tensions that exist in a context of robust innovation, which creates conditions that are also conducive to less-than-legitimate actors. To mitigate this, the independent school sector in Ontario should work together to align its common goals of quality and innovation in education, and seek to grow a united voice that can represent its common concerns to the ministry. Further, the government should actively seek to partner with the independent school sector where possible, availing itself of the deep knowledge and trust-building potential inherent in relationships forged by independent school associations and school leaders. The vast majority of independent schools have a vested interest in

²⁷ Conference of Independent Schools of Ontario, "Member Services," <https://www.cisontario.ca/membership/member-services>; Edvance Christian School Association, "School Services," <https://edvance.ca/services/school-services>; Ontario Federation of Independent Schools, "Leadership Services," <https://ofis.ca/leadership>; Independent and Private Schools Forum, "Membership Information and Benefits at a Glance," <https://ipsf.ca/ipsf-membership-benefits/>.

²⁸ Canadian Accredited Independent Schools, "Steps to Becoming a CAIS Member School," <https://www.cais.ca/membership/steps-to-becoming-a-cais-member-school>.

²⁹ For example, the Toronto District School Board's most recent strategic plan available on the website was last updated in October 2019. See Toronto District School Board, "Multi-year Strategic Plan," <https://www.tdsb.on.ca/leadership/boardroom/multi-year-strategic-plan>.

providing quality education that directly serves student needs. The approach of the government of British Columbia, for example, in which independent school representatives are valued as stakeholders in education, should be considered a viable route to strengthening the legitimacy of the sector.³⁰

The government could also consider other ways of encouraging higher standards by studying the efficacy of existing community-driven, self-regulatory mechanisms (such as Ontario Federation of Independent Schools, and Canadian Accredited Independent Schools) within the independent-school sector. Membership in these types of associations has the potential to ensure the quality of education provided in Credit Emphasis schools that operate within a minimally regulated environment.

The International Student Context

As of 2022–23, there are 9,757 non-Canadian students enrolled in Ontario’s K–12 district (public) schools.³¹ The number of international students enrolled in independent schools in Ontario is not known. District schools and independent schools have been recruiting international students for many years, and these students have become an increasingly important source of revenue.³² Since 2015, Ontario has embraced its “Ontario’s strategy for K–12 international education” for its district schools, and the number of international students in the province has increased significantly. If post-secondary international students are included, the number increased by 74 percent between 2021 and 2023 alone (from about 302,126 to 526,015 students).³³

In their study comparing Manitoba’s and Ontario’s approaches toward international students, scholars Roopa Trilokekar and Merli Tamtik point to a growing body of research that has raised

serious concerns about how international education in the K–12 sector encourages privatization and inequity and thereby supports values that are antithetical to the very core of Canada’s public educational system. What needs to be examined, and should be the concern of *all* educational policy makers, is the dominant trope of recruiting international students as “cash cows” and turning a blind

³⁰ V. Cunningham, *Justice Achieved: The Political Struggle of Independent Schools in British Columbia* (Vancouver, BC: Federation of Independent School Associations in British Columbia, 2002), 222.

³¹ ICEF Monitor, “International Enrolment in Canadian K–12 Recovered to More Than 80% of Pre-pandemic Levels in 2022/23,” November 22, 2023, <https://monitor.icef.com/2023/11/international-enrolment-in-canadian-k-12-recovered-to-more-than-80-of-pre-pandemic-levels-in-2022-23/>.

³² For example, in 2021–22, the Toronto District School Board charged international students \$16,000 per year for tuition. Toronto District School Board, “Fee Schedule and Methods of Payment,” <https://www.tdsb.on.ca/About-Us/International-Programs/International-Students/Fees>.

³³ Ontario Ministry of Education, “Ontario’s Strategy for K–12 International Education,” Government of Ontario, 2015, <https://files.ontario.ca/edu-strategy-k-12-international-education-2015-en-2021-11-25.pdf>; ICEF Monitor, “International Enrolment”; ICEF Monitor, “Canada Hosted More Than 1 Million International Students in 2023,” January 24, 2024, <https://monitor.icef.com/2024/01/canada-hosted-more-than-1-million-international-students-in-2023/>.

eye toward our political, social, and cultural priorities of inclusivity, diversity, and equity.³⁴

While there are increasing media reports on the experiences of international students in the post-secondary sector, the paucity of information and research on the experience and welfare of K–12 international students, and on their academic and other outcomes, deserves further research. Trilokekar and Tamtik suggest that even ministry officials are concerned. Some have commented on the lack of “regulation of private schools that ‘are also bringing international students into the province in a big way, and they don’t have rules to follow and the[re is] . . . no one . . . watching.’”³⁵ Despite the philosophical differences on what constitutes public education (and by extension, its values), and on the benefit of educational pluralism to society,³⁶ the concern of these researchers for the unchecked recruitment of international students is shared by many in the independent-school sector.

Ontario has, in effect, rushed to bring in international students but maintains an educational structure and government strategy that “exists in policy silos,” prioritizing an economic agenda but failing to ensure sufficient guidelines and accountability for quality of education, as well as practices of homestay, guardianship, and equitable opportunity for these young people.³⁷ Scholars Lana Parker and Natalie Delia Deckard corroborate these observations and contest that Ontario’s practice has “blurr[ed] the line between education as a public good and education as a salable commodity in the world-system,” and those who lose out are the students themselves.³⁸ Davies et al. note how rising levels of immigration have contributed to an increase in the number of independent schools in Ontario, as affluent global citizens seek university credentials in Western countries such as Canada.³⁹ The schools they identify in their research as Third Sector and International are similar in nature to the schools that Cardus research has typed Credit Emphasis. These schools are fuelled by the increased internationalization of education, and their appeal to legitimacy relies on existing school norms, and the appeal of the OSSD.

Three out of four Credit Emphasis schools offer special services to international students in addition to their course offerings. Though this characteristic is not

³⁴ R.D. Trilokekar and M. Tamtik, “A Comparative Analysis of the K–12 International Education Policies of Ontario and Manitoba,” *Canadian Journal of Educational Administration and Policy* 193 (2020): 45, <https://journalhosting.ucalgary.ca/index.php/cjeap/article/view/68213>.

³⁵ Trilokekar and Tamtik, “A Comparative Analysis,” 37.

³⁶ For an argument on the contribution of independent schools to social and civic formation, consider A. Berner, “Good Schools, Good Citizens,” Cardus, June 30, 2021, <https://www.cardus.ca/research/education/reports/good-schools-good-citizens/>; and for a redefinition of independent schools as a contribution to the public good, consider M. Casagrande, R. Pennings, and D. Sikkink, “Rethinking Public Education: Including All Schools that Contribute to the Public Good,” Cardus, October 7, 2019, <https://www.cardus.ca/research/education/reports/rethinking-public-education/>.

³⁷ Trilokekar and Tamtik, “A Comparative Analysis,” 40.

³⁸ Parker and Deckard, “Market for a Public High School Degree,” 128.

³⁹ S. Davies et al., “A School Is Born: Predicting the Recent Births of Private Schools in Ontario” (unpublished manuscript, January 2023).

included in the legitimacy framework, its prevalence in these schools suggests that consideration should be given to the effect of the internationalization of education in Ontario. In addition to ensuring the quality of education, the government should consider the regulation of homestay programs and international recruitment practices, to ensure that students are not defrauded or otherwise exploited, regardless of the type of school in which they are enrolled. As the number of international students studying in Canada increases, and as the OSSD remains a valuable credential, further research is needed to assess the academic outcomes and overall well-being of international students.

Conclusion and Recommendations

The legitimacy framework offered in this study provides criteria that can be used to assess the schools in Ontario that previous Cardus research typed as Credit Emphasis. Qualities that are associated with weaker overall legitimacy are poor website functionality and the offering of only upper-level courses, most often limited to a few subject areas. The absence of external accountability mechanisms, such as membership in a school association, charitable status, and history within a particular community, means that the only avenue of accountability is the biannual inspection by the ministry. These inspections are conducted only for schools that are approved to offer OSSD credits (92.3 percent of all Credit Emphasis schools). While anecdotal evidence that the researcher has received from principals of other types of schools suggests that these inspections are thorough, they are also infrequent, focus on specific curricular requirements, and do not guarantee any mechanism of fiscal oversight or governance accountability. This study suggests that these inspections, and the mechanisms and timelines in place for ensuring resolution of concerns noted, are not enough to prevent the possible proliferation of credit mills within the sector.

This research also reveals some of the consequences of the privatization model that the province of Ontario uses for independent schools. Other Canadian provinces exhibit a more pluralist model, in which the government funds independent schools to some degree and in turn has more robust regulation.

In order to maintain the quality and integrity of the Ontario Secondary School Diploma, and for the well-being of international students studying in these schools, the Ontario government should consider strengthening and prioritizing the civil-society institutions that exist to support and grow independent schools. Improving communication and relationships with independent school associations and school leaders as stakeholders in education delivery will serve to improve its legitimacy. Additionally, the governments of Ontario and Canada should ensure coordination between the provincial Ministry of Education and the federal Immigration, Refugees and Citizenship Canada to prioritize further data collection and research on international students in K–12 schools, to ensure the protection of international students from fraud, exploitation, and low quality of education. Finally, the Ministry of Education could strengthen its inspection process by, for example, conducting

interviews with a broader range of educators and employees within a school, or with students and parents. In this way, the integrity of the independent-school sector in Ontario and the quality of the OSSD throughout the province can be better assured.

Appendix: Legitimacy Framework

Criterion	Method of verification	Parameters	Scoring system
1. Web search for the school			
(a) SSL certificate	Is the website secure?	The website has an SSL certificate.	1
		The website does not have an SSL certificate.	0
		Unknown (domain name has expired, or a security warning prevents access).	U
<p>Rationale: The SSL (Secure Sockets Layer) or TLS (Transport Layer Security) of a website provides security between a web browser and a web server and is considered standard for secure online transactions. When a website has this certificate, it can be distinguished by the presence of an “s” in the web domain (“https” rather than “http”) and by a padlock icon. A trustworthy organization or business should ensure the protection of personal data when conducting online transactions. This criterion is not an infallible measure of website security but was chosen for its simplicity and its establishment as standard practice. Other criteria (such as a Whois look-up) might offer additional insight into the security and trustworthiness of a website.</p>			
(b) Domain search	Is the domain unique? For example, if ABCSchool.org exists, does the domain ABCSchool also exist with other suffixes, such as .com?	When the domain is searched using suffixes other than the one the school uses, the search results in (a) a redirect to the school’s website, (b) the website of another school with the same name (but using a different suffix), or (c) the domain is still available for purchase.	1
		When the domain is searched using suffixes other than the one the school uses, the search results in website(s) that are not schools.	0
		Unknown (domain has expired, or a security warning prevents access).	U
<p>Rationale: Independent schools seek to distinguish themselves by having a unique identity and/or educational programs. A school’s website should reflect this distinctiveness and a domain name should clearly reflect its identity. The owner of a domain such as ABCSchool.org has no control over what appears on ABCSchool.com, if the .com site has another owner, so a school that is concerned with its reputation will likely purchase the domain with several suffixes. An owner that purchases more than one suffix will likely redirect the other ones to the primary site. If the owner purchases more than one suffix for the same domain and places very different information on each site, a school’s legitimacy is undermined.</p>			

Criterion	Method of verification	Parameters	Scoring system
(c) Social-media presence	Does the school have an active social-media presence?	The school maintains active social-media accounts on more than one platform.	1
		The school maintains one active social-media account.	0.5
		The school's website contains social-media icons or links, but they do not work, and a search for social-media accounts returns no results.	0
		Unknown (domain name has expired, or a security warning prevents access).	U
<p>Rationale: Independent schools use social-media platforms to market their school, communicate and demonstrate transparency, and build community with parents and the school's wider constituency. It is therefore common for schools to actively maintain several accounts on social media. Schools that are less concerned with transparency or promotion of their activities may use a website template giving the appearance of these attributes, but the social-media icons or links do not lead to actual social-media accounts. In this study, the social media platforms Facebook, Instagram, and X (formerly Twitter) were checked for the presence of school accounts.</p>			
2. School website			
(a) Overall functionality and informativeness	Does the school have a functional, informative website?	The school website is fully functional and informative. There are no broken links, stock photos, or placeholder text (such as "Contact information goes here"). The information provided about the school is up to date and extensive.	1
		The school website is passably functional. It contains one or two broken or inactive links, some stock photos, and/or some information is not up to date.	0.5
		The school website is minimally functional. It contains many broken or inactive links, placeholder text is prominent, most photos are stock photos, and/or most information is not up to date.	0
		Unknown (domain name has expired, or a security warning prevents access).	U

Criterion	Method of verification	Parameters	Scoring system
<p>Rationale: To maintain organizational stability, independent schools in Ontario must engage in student recruitment and community engagement to interested prospective parents, and to former parents who may remain supporters. A well-functioning and informative website is a key component of any independent school's recruitment of students and community of donors or other supporters.</p>			
(b) Identity of owner/principal and contact information	Does the website identify the owner, principal, or manager of the school by name and provide their contact information?	The website identifies this person by name and provides a way to contact them.	1
		The website does not identify this person by name, but a way to contact the school is provided.	0.5
		The website does not identify this person by name and does not provide a way to contact them or the school.	0
		Unknown (domain name has expired, or a security warning prevents access).	U
<p>Rationale: Ontario's <i>Education Act</i> requires independent schools to have a principal in order to operate. Thus, schools routinely list the principal's name and contact information on their website. It is therefore reasonable to assume that this is key information for prospective students or their families to assess the quality of the school.</p>			
(c) Educator information	Does the website provide information about the educators?	The website provides names and credentials of the school's educators.	1
		The website provides names of the school's educators but does not provide their credentials.	0.5
		The school does not provide names or credentials of the school's educators.	0
		Unknown (domain name has expired, or a security warning prevents access).	U
<p>Rationale: The Ministry of Education requires independent schools to maintain control of the quality of instruction and evaluation of student achievement. Qualified educators play a central role in meeting these requirements. As schools vary in purpose, they may hire teachers for subject-specific expertise or for pedagogical expertise. Educators may or may not have an Ontario teaching certificate, but either way, the quality of the school is enhanced by well-qualified educators specific to the purpose of the school. Thus, schools will provide up-to-date information regarding their faculty on their website.</p>			

Criterion	Method of verification	Parameters	Scoring system
(d) Education policy information	Does the school's website provide information about education policies (such as course requirements) and make policy documents available?	The website provides information about the school's education policies. Policy documents are present and up to date.	1
		The website makes vague or generic reference to the school's education policies. Policy documents may be present but may not be up to date.	0.5
		The website does not make any reference to the school's education policies.	0
		Unknown (domain name has expired, or a security warning prevents access).	U
<p>Rationale: The ministry requires independent schools to maintain educational policies on such matters as student attendance, course completion and evaluation, and maintenance of student records. For example, schools approved to offer Ontario Secondary School Diploma (OSSD) credits must comply with the ministry's requirement that OSSD courses be 110 hours in length and that student learning be assessed according to Ontario's "Growing Success" document. Schools that offer the full OSSD diploma must also demonstrate policy for the Ontario Secondary School Literacy Test and the forty-hour volunteer commitment requirement for graduation. Schools should routinely provide and describe these policies in student/parent handbooks, course calendars, and other material on their websites.</p>			
3. Web search for school location			
(a) Location match	Does a Google search for the school's location match the address given on the school's website or provided in the Open Data Catalogue?	A Google search for the location of the school matches the address given on the website or in the Catalogue.	1
		A Google search for the location of the school does not match the address given on the website or in the Catalogue.	0
		Unknown (domain name has expired, or a security warning prevents access).	U
<p>Rationale: The ministry requires independent schools to submit up-to-date location and contact information each year. Failure to submit accurate information can result in fines and/or the loss of the school's identification number, so that it is no longer able to legally operate.⁴⁰ Additionally, the working assumption is that legitimacy is associated with accurately published location information; a legitimate school will want students and families to know where its operation is located.</p>			

⁴⁰ Ontario Ministry of Education, "Private Schools: Policy and Procedures Manual," 10–11.

Criterion	Method of verification	Parameters	Scoring system
(b) Facilities conducive to a learning environment	Does the school's address suggest that the site-based education occurs in facilities that are conducive to a learning environment? This criterion is assessed for schools that are both internet- and site-based, and for schools that are site-based only. Schools that are internet-based only are omitted.	A Google search demonstrates that the school is located in an institutional space (a school building or a church building).	1
		A Google search demonstrates that the school is located in an office, retail, or residential space.	0.5
		A Google search demonstrates that the school is located in an industrial space or a space whose nature cannot be determined.	0
		Unknown (domain name has expired, or a security warning prevents access).	U
Rationale: The <i>Education Act</i> requires independent schools to have a central office for the maintenance of school records. Improper and insecure management of student records can result in the loss of credit-granting authority. ⁴¹ The ministry inspects student transcripts, records, secure files, and educational policy, and these require a central office. ⁴² Additionally, a site-based school's physical environment affects the quality of the curriculum and the student experience. Schools often provide outdoor spaces, gymnasiums, and classrooms suitable for instruction. Spaces not purpose-built as schools (such as office, retail, and residential spaces) may offer some of these characteristics but are less likely to provide all of them. This research deems industrial spaces (such as warehouses and shipping centres) as not conducive to a learning environment or to the maintenance of school records.			
(c) Online platform	Does the school's website include a portal to an online learning platform requiring log-in credentials? This criterion is assessed for schools that are both internet- and site-based, and for schools that are internet-based only. Schools that are site-based only are omitted.	The website includes a portal requiring log-in credentials to access.	1
		The website does not include a portal, or the portal does not require log-in credentials to access.	0
		Unknown (domain name has expired, or a security warning prevents access).	U

⁴¹ Ontario Ministry of Education, "Private Schools: Policy and Procedures Manual," 10–11.

⁴² Ontario Ministry of Education, "Ontario Student Record (OSR) Guideline," Government of Ontario, <https://www.ontario.ca/page/ontario-student-record-osr-guideline#section-1>; Ontario Ministry of Education, "The Ontario Student Transcript (OST)," Government of Ontario, 2013, <https://files.ontario.ca/edu-ontario-student-transcript-manual-2013-en-2022-01-04.pdf>.

Criterion	Method of verification	Parameters	Scoring system
<p>Rationale: Schools that provide their instruction fully online do not require extensive space, but when providing OSSD credits they are subject to ministry requirements, one of which is a secure platform with log-in credentials. The schools must also provide evidence of a text-based conferencing system, individual and group learning activities, accessibility via the internet from any location, and ongoing communication between teachers and students.⁴³</p>			
4. Characteristics of school offerings			
(a) Course offerings	Does the school offer a full range of courses toward OSSD completion?	The school offers a full range of courses, defined as at least eighteen compulsory courses and twelve optional courses (and eight courses per grade level offered), as this is the ministry's requirement for OSSD graduation.	1
		The school offers a partial range of courses, defined as between three and seven courses per grade level offered.	0.5
		The school offers one or two courses per grade level offered.	0
		Unknown: the school's website does not provide enough information to determine.	U
<p>Rationale: While organizational capacity as a criterion for legitimacy is not determinative, it is logical to include. This research assumes that schools offering a partial range of courses have a higher degree of organizational legitimacy, due to increased capacity requirements. Schools that offer a full range of OSSD courses must also demonstrate adherence to other OSSD requirements, such as offering the Ontario Secondary School Literacy Test and managing the forty-hour volunteer commitment. However, the presence of these additional requirements was not assessed in this criterion.⁴⁴ It should also be noted that this criterion does not differentiate between OSSD courses advertised and ministry-approved OSSD courses for credit. Ministry approval to offer OSSD credits is assessed in another part of this framework, below.</p>			
(b) Curricular variety	Does the school offer courses in a variety of subject areas?	The school offers courses in more than two subject areas.	1
		The school offers courses in one or two subject areas.	0
		Unknown: the school's website does not provide enough information to determine.	U

⁴³ Ontario Ministry of Education, "Private Schools: Policy and Procedures Manual," 32.

⁴⁴ Ontario Ministry of Education, "High School Graduation Requirements," Government of Ontario, <https://www.ontario.ca/page/high-school-graduation-requirements>.

Criterion	Method of verification	Parameters	Scoring system
Rationale: Schools that exist to offer only grades 11 and 12 OSSD courses in a specific subject area, such as in math and science, are identifying a market of increased competition for university entrance and may be more likely to award high marks for lower performance.			
(c) Extracurricular activities	Does the school offer extracurricular activities?	The school offers extracurricular activities.	1
		The school does not offer extracurricular activities.	0
		Unknown (domain name has expired, or a security warning prevents access).	U
Rationale: Extracurricular activities are a frequent source of positive enhancement of experience for students, contributing toward volunteer experiences, leadership and skill acquisition, and social development.			
5. Longevity and accountability structures			
(a) Longevity	How long has the school existed?	The school's website indicates that it has existed for more than ten years.	1
		The school has existed at least five years (it is listed in the Open Data Catalogue of 2018), and the website provides no information to indicate that it has existed for more than ten years.	0.5
		The school has existed for less than five years (it is not listed in the Open Data Catalogue of 2018).	0
		Unknown: it is not possible to ascertain the history of the school.	U
Rationale: The ministry advises parents to determine the number of years the school they are choosing has been in operation. ⁴⁵ Schools that have been established for longer have passed routine ministry inspections; have had time to develop policy, increase organizational capacity, and demonstrate consistent student enrolment; and have established themselves within a local community.			

⁴⁵ Ontario Ministry of Education, "Private Schools," Government of Ontario, <http://www.ontario.ca/page/private-schools-0>.

Criterion	Method of verification	Parameters	Scoring system
(b) School association	Is the school a member of a school association?	The school is a member of a school association, or is in the process of being considered for membership.	1
		The school is not a member of a school association, and is not in the process of being considered for membership.	0
		Unknown: it is not possible to ascertain whether the school is a member of an association.	U
<p>Rationale: Many independent schools maintain membership in school associations, for additional accountability and/or for support and expertise in policy and practice. Membership may be based on an accreditation process and generally require annual fees. For the purposes of this study, “school association” was defined as an established school association such as the Ontario Federation of Independent Schools or the Independent and Private School Forum, or affiliation with an accrediting institution such as the AP College Board, an institution of higher education, or a religious community group of schools. Affiliations that schools stated on their websites were cross-checked with the school association’s list of members as stated on their own websites.</p>			
(c) OSSD credits	Has the Ministry of Education authorized the school to grant OSSD credits?	The school has been authorized to grant OSSD credits.	1
		The school is currently undergoing application to grant OSSD credits.	0.5
		The school has not applied or is not authorized to grant OSSD credits.	0
		Unknown (domain name has expired, or a security warning prevents access).	U
<p>Rationale: The ministry governs the accreditation of schools to grant OSSD credits and maintains policy and procedure for biannual inspection of these schools, to protect credit validity. Presumably, those schools that are currently accredited have successfully passed inspection by the ministry. Schools that the ministry has not authorized to grant OSSD credits are not inspected. However, they typically advertise teaching Ontario high school curriculum (“OSSD courses”) and may not be transparent about their lack of accreditation on their websites.</p>			

Criterion	Method of verification	Parameters	Scoring system
d) Charitable status	Is the school (or entity that owns the school) a registered charity with the Government of Canada?	The school (or entity that owns the school) is listed as a registered charity.	1
		The school (or entity that owns the school) is not listed as a registered charity. (It is possible that the school is listed as a registered charity under another name.)	0
		Unknown (domain name has expired, or a security warning prevents access).	U
Rationale: Schools that are registered charities are accountable to government and to donors in a variety of ways. They are required to maintain a board of directors, provide fiscal transparency, and meet government-reporting requirements on an annual basis. This increased accountability to both external and internal authorities ensures parameters for organizational legitimacy and helps to prevent fraudulent or untrustworthy behaviour.			
		Possible total score: *For internet-based-only or site-based-only schools, the maximum possible total score is 16.	17

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