

LETTER OF AGREEMENT

BETWEEN

**The Council of Trustees' Associations/
Le Conseil des associations d'employeurs**

"CTA"

AND

The Canadian Union of Public Employees

"The Union"

AND

**The Crown in Right of Ontario
(as represented by Treasury Board Secretariat and the Ministry of Education)**

"The Crown"

RE: Implementation of Bill 124 Remedy Memorandum of Settlement

WHEREAS:

- (a) Pursuant to a Memorandum of Settlement dated November 16, 2023 (the "**Remedy MOS**"), the Crown and the Union have agreed to resolve any and all issues and claims arising from the OFL Application, the liability findings in the SCJ Decision, and in respect of the PSPSFGA and its impact on the Moderated Collective Agreements, in each case in respect of the CUPE EW Bargaining Units (with defined terms not specifically defined herein being defined in the Remedy MOS); and
- (b) The Crown, the Union and the CTA (collectively, the "**Parties**") wish to resolve matters relating to the implementation of the Remedy MOS;

NOW THEREFORE, the Parties agree as follows:

1. Conditional upon approval by the Lieutenant-Governor-in-Council (if applicable), the Crown commits to providing the applicable school boards with funding consistent with the appropriate changes to the Grants for Student Needs (GSN) benchmarks within 60 days of the date that the Year 3 Increase is finally determined in accordance with Remedy MOS (including the completion of any challenges to or arising from the OSSTF Arbitration, including judicial review applications, etc.) (for all purposes herein, the "**Determination Date**"). For greater clarity, such appropriate changes to the GSN benchmarks shall be inclusive of all of the Compensation Increases (as defined in the Remedy MOS) and any necessary adjustments required to reflect the Memorandum of Settlement entered into by the Union and the CTA (and agreed to by the Crown) dated November 20, 2022 with respect to the 2022-2026 central terms (the "**2022-2026 MOS**").

2. The Parties agree that the necessary changes will be made to (i) the Moderated Collective Agreements (as defined in the Remedy MOS), and (ii) the 2022-2026 collective agreements, to implement the Remedy MOS and, in respect of the 2022-2026 collective agreements, the 2022-2026 MOS. These changes will include modifications to all wages, salaries, applicable allowances, applicable premiums, and all other compensatory amounts, which are dealt with in the Remedy MOS. These changes shall be made retroactively, in accordance with the effective dates prescribed, as applicable, in the Remedy MOS, the OSSTF Arbitration decision (or any settlement thereof), and/or the 2022-2026 MOS, in each case as specified therein. For clarity with respect to the 2022-2026 collective agreements, the Parties agree that the compensation increases set out in the 2022-2026 MOS shall be applied on top of the 2021-2022 compensation rates, as adjusted by the Remedy MOS.
3. School boards shall meet with CUPE Locals within 30 days of the Determination Date to discuss the process of revising the 2019-2022 and 2022-2026 collective agreements in accordance with the terms of the Remedy MOS and this Letter of Agreement, including the calculation of the retroactive amounts owed to each eligible employee hereunder.
4. School boards shall provide payments to eligible employees within 120 days of the Determination Date. For greater clarity, such payments shall be inclusive of all necessary adjustments as set out in paragraph 2 above.
5. Any disputes with respect to the implementation of this Letter of Agreement shall be referred to a sole arbitrator in accordance with paragraph 1(d) of the Remedy MOS.
6. The Union, the Crown, and the CTA affirm the agreement memorialized in paragraph 3 of the Remedy MOS.
7. The Parties agree that this Letter of Agreement may be executed electronically and in counterpart.

Signed in Toronto, the 16th day of November 2023.

FOR THE CROWN:
DocuSigned by:
Andrew Davis 11/16/2023
DocuSigned by:
3557B44352D8431...
A. Disse 11/16/2023
C4AB6304EA32470...

FOR THE UNION:
DocuSigned by:
Laura Walton 11/16/2023
DocuSigned by:
74F56F855568428...
Rod McGee 11/16/2023
DocuSigned by:
973DDFE4120440B...
Michel Revelin 11/16/2023
2734CB5C2E74445...

FOR THE CTA:
DocuSigned by:
Andrew Gold 11/16/2023
DocuSigned by:
0A30BCF4CD1E46C...
Ron McNamara 11/16/2023
DocuSigned by:
2931EAD8EDFA4D6...
[Signature] 11/16/2023
DocuSigned by:
3A8EDA018BFE4A2...
[Signature] 11/16/2023
2B9805181B5344F...