

March 9, 2018

Independent Review Panel
K-12 Sector Public Education Funding Model Review
K12FundingReview@gov.bc.ca

Panel Members:

The Board of Education for Maple Ridge – Pitt Meadows School District No. 42 is committed to fostering and supporting an inclusive community of learners. Our vision is for every individual to feel valued and for all learners to reach their potential. We value the uniqueness of each individual and provide diverse learning opportunities so that all our learners have the capacity to learn and succeed.

Our board is pleased to offer this written submission in response to the request for feedback on the current funding allocation model. Before we provide our recommendations, however, we would like to outline what we feel should be guiding considerations. Please know the submission has also been endorsed by each of the following education partners – CUPE Local 703, District Parent Advisory Council, Maple Ridge Principals and Vice Principals Association and Student Voice:

- the final formula must support the best possible student outcomes;
- the final formula must be fair and equitable, and not benefit some school districts through the impoverishment of others;
- any changes to the funding formula that will result in additional funding being distributed to some school districts and funding being taken away from others should be phased in over a reasonable number of years and in conjunction with overall increases to education funding;
- adequate funding must be provided to meet the ongoing operating costs of each school district no matter what the final formula looks like.

Responsive

Community Link and Vulnerable Student funding - The current distribution of *Community Link and Vulnerable Student* funding appears to be more historical rather than formula-driven and responsive to school district demographics. Some districts currently receive much more funding per student in these categories than others that, at least on the surface, appear to have similar or greater needs. The current allocation also does not recognize that some districts need to spend operating grant funding on occupational therapy, physical therapy and mental health supports, as such services are not provided by other agencies in the community. Vulnerability is currently assessed using a variety of tools including the *Early Development Instrument (EDI)*, the *Middle Years Development Instrument (MDI)*, the *Social Services Index*, as well as assessments by the Ministry of Child and Family Development and various regional Health Authorities. The Ministry of Education can encourage participation in future EDI and MDI assessments to ensure this data is collected on all school districts in the province.

Recommendation 1: It is recommended that a new formula be created for the distribution of Community Link and Vulnerable Student funding that considers both the overall student population as well as an annual assessment of student vulnerability in each school district.

Annual Facilities Grant Funding - There is an enormous deferred maintenance need in the province that will result in significant longer term capital costs if not addressed in a timely manner.

Recommendation 2: It is recommended the operating portion of the annual facilities grant reflect full lifecycle maintenance cost as identified through the facilities audits conducted by VFA on behalf of the Ministry of Education.

Portable Classrooms - The purchase of portable classrooms to address capacity issues should not require operating funding. The use of operating funds for capital work results in growing districts having to divert precious operating dollars from classrooms where those funds are needed to address student educational needs.

Recommendation 3: It is recommended that capital funding be provided for portable classrooms required for enrolment growth.

Salary Differential – The current formula only recognizes the salary cost differences between the average teacher salary in each school district and the provincial average teacher salary. Cost differentials for other employee groups and benefit cost differentials are not recognized. In recent years, BCPSEA has negotiated provincial benefit plans for support staff and teachers that significantly increased the cost of benefits in our school district. BCPSEA also created regional salary grids for principals and vice principals.

Given that local boards have minimal control over salaries and benefit costs, all cost differentials should be recognized in the new formula.

Recommendation 4: It is recommended that a new salary differential formula be created based on cost differentials for salaries and benefits for all employee groups compared to the lowest school district salaries and benefits in the province.

Funding for Students with Special Needs – For over 25 years, our board has been committed to supporting the full inclusion of our students with special needs by ensuring that levels of support teacher FTE, educational assistant time, and other required resources are adequately funded.

Like other districts in the province, the Maple Ridge – Pitt Meadows School District (SD42) spends a significant amount of money over and above the supplemental funding provided for students in Levels 1, 2, and 3 in order to sufficiently meet the educational requirements of these students. The spending includes funding for educational, medical, behavioral, and physical supports as well as funding for equipment and technology. The loss of the specialized equipment grant in the 2016/17 school year placed the financial burden for funding specialized equipment for students with physical and other challenges on school districts. This new financial burden together with the costs required to support the increasing complexity of students needs is putting significant pressure on our ability to support all students.

In addition to having to cover costs over and above the supplemental allocation for educational supports to students in low incidence (funded) categories, the school district must also provide significant levels of support to some students identified in high incidence (not funded) categories. Some students identified as having mild intellectual disabilities (and who receive no supplemental funding), for instance, exhibit needs similar to students identified as having moderate to severe intellectual disabilities (and who do receive supplemental funding). Often these students would have a very slight IQ difference but their adaptive level of functioning may be quite similar.

The diagnostic criteria currently used in each of the Ministry of Education defined categories assumes that students identified in that category have similar needs. This, however, is not the case. The educational needs of students don't necessarily align with their diagnosis and the needs of students identified in the same category can range from minimal to very significant. An example of this would be students who are identified as having Autism Spectrum Disorder. Students identified in this category with Asperger Syndrome may require minimal intervention to be successful. This intervention may include educational assistant (EA) time to assist with developing visual supports, social skill training and support for self-regulation and organization. Students in the same category with severe autism combined with intellectual and behavioral issues, on the other hand, may require a significant level of support, including two EAs (due to safety issues), a communication device, support from a behavioral specialist, speech and language pathologist, and an occupational therapist. The resulting cost can rise to more than 3 times the supplemental funding amount for that student.

Another example would be students who are identified as having physical disabilities or chronic health impairments. A student with mild cerebral palsy may require minimal support (e.g. assistance with toileting), whereas a student with muscular dystrophy may require extensive support (e.g. support for catheterization, feeding, dressing, two person transfers and academic support). Similarly, students with diabetes may range from needing a check-in 2 times per day to requiring continual supervision due to medical fragility and the need for adherence to the medical parameters around the administration of glucagon.

Recommendation 5: It is recommended that the new funding model for students with special needs move closer to the actual funding required to meet the educational needs of students with special needs. In our school district, moving to this model would also support continued alignment with our restored teacher collective agreement language, which is based on Ministry of Education defined categories.

The following funding model be considered for students identified as having special needs:

1. Remove Low and High Incidence Designations from the funding model.
2. Maintain Ministry Categories based on diagnostic information for most categories (A, B, C, D, E, F, G, K, Q, P).
3. Combine categories R and H into the category Students with Behavioral Needs or Mental Illness, and consequently remove the need for community services currently required for category H. Satisfying this requirement depends on many factors not within the control of the school district, including availability of community supports, length of waiting lists, parents' readiness to access supports, etc. There are students in our district with a category R designation who actually require a much higher level of support than some students identified in category H because they do not have the required community supports.
4. Include a "needs based" framework within each of the categories. This could be based on the Response to Instruction/Intervention framework – universal needs; targeted needs; intensive needs and/or the instructional support planning tools levels; A, B, C minimal needs; moderate needs; intensive needs. The levels would be focused on the actual supports that districts must provide to educate the student effectively, including educational, behavioral, medical, and physical supports, as well as the provision of necessary equipment and technology. The criteria for inclusion in each of these levels would be clearly articulated in order to maintain accountability for services provided.
5. Districts would identify all students in each category in one of the three levels of need.
6. The audit process would move from a focus on paperwork compliance to one based on the provision of educational services aligned with the funding allocation. In order to support districts to more effectively support the inclusion of students with diverse abilities, the audit process could also include research-based quality feedback.

Although this approach would maintain a need for diagnostic assessment, it would move practice from focussing primarily on meeting criteria for designation to a focus on the educational needs of students and would more accurately reflect the true educational costs.

Unique Student Needs – The supplemental funding provided for English Language Learners and Indigenous students allows school districts to provide the necessary supports to these vulnerable populations and should be continued.

Recommendation 6: It is recommended that funding continue to be allocated on a per student basis for English Language Learners and Indigenous students since there are clear differences between districts in each of these categories.

Classroom Enhancement Funding – The restored teacher collective agreement language differs greatly from district to district. Changing the Classroom Enhancement funding formula to a simple student population formula would not address the different costs attributable to districts based on their different agreements. The distribution of funding must match the costs dictated by collective agreements; to do otherwise would be disastrous for those districts that must provide higher levels of funding to meet the terms of their specific agreements.

Recommendation 7: It is recommended that the Classroom Enhancement funding continue to be allocated on an incremental cost basis until there is common province-wide collective agreement language for teachers. It is further recommended that the impact of enrolment changes on the cost related to the implementation of restored collective agreement language be recognized in the annual funding allocations.

Equitable

Base Per Pupil Funding

Headcount Based Funding Grades K-9

The revised provincial curriculum at K to 9 mandates that student learning will be personalized and deliberate connections will be made across the disciplines in order to engage students in learning. The current funding model recognizes that the education of the whole student is our goal, and funding is consequently assigned to each student. We believe that the funding for K to 9 is appropriately structured.

Course-Based Funding Grades 10 to 12

Since the implementation of the current funding formula in 2002, two models were used for allocating funding for grades 10-12.

1. **The original model allocated funding based on student FTE calculated as a base of 0.5 FTE plus course enrolment (4 courses equal 0.5 FTE), to a maximum of 1 FTE per student headcount.**

Under this model, in some schools “spare” blocks were overallocated to students with special needs and to students who were struggling and/or disengaged. The unintended outcome of this system was a much lower school completion rate for vulnerable students.

2. **The current model allocates funding based on student FTE calculated as 0.125 FTE for each course in which a student enrolls, with no maximum FTE per student headcount.**

Under this model, we are encouraging our grade 10 to 12 students to take 8 courses. Some students take more than eight courses; some students take less than 8 courses depending on their particular circumstances. We have encouraged secondary school principals to open more high interest, hands-on elective courses. Our objective is to offer all students authentic opportunities for engagement.

Consistent with our experience under the previous funding model, not all students complete the courses they register in at the beginning of the year. However, the fact that most students are originally enrolled in a full course load allows even our most vulnerable students to have a greater chance to graduate. In addition, the school district must staff schools based on course enrollment at September 30. This staffing cannot be reduced when students decide to drop a course in which they have enrolled.

The success of this model is illustrated through the improvement we have seen in results for our Aboriginal students and students with special needs since we started encouraging grade 10-12 students to take at least 8 courses. Those students who were in grade 10 in 2014/15 form the six year graduation rate of 2016/17. We saw an increase of almost 11.5% in our aboriginal completion rates (from 72% in 2014/15 to 83.5% in 2016/17) and an increase of over 5.2% in our completion rates for students with special needs (from 69% in 2014/15 to 74.2% in 2016/17).

This model also supports students who want to explore courses beyond those required for graduation. Perfect examples are fine arts and sports electives. All interested students can benefit from the richness of these additional offerings.

In our schools we addressed student concerns about preparation, study and planning time by offering “flex” blocks during the school day. Flex blocks ensure all students have time during the school day to meet with their teachers or get assistance, and do not disadvantage vulnerable students.

As we implement the new graduation program, we need to maintain the flexibility of course based funding so that we can grow options in the context of this new, more flexible and holistic curriculum.

Recommendation 8: It is recommended that base per pupil funding be allocated based on student headcount for grades K-9, and based on course-driven FTE calculation for students in grades 10-12. It is further recommended that funding be consistent between school age and adult learners enrolled in the same program.

Distributed Learning - Distributed Learning (DL) programs are critical to providing access to educational programs for many students throughout the province. It should be noted these programs are not always less costly to provide than similar courses offered in other educational settings.

DL courses are a necessary component of our modern school system. Funding for DL needs to be directed at models of DL delivery that offer a high level of student success. In our school district, blended DL models (those that combine in-person teacher support with the flexibility of DL) are more successful than pure DL courses.

Recommendation 9: It is recommended that the basic per pupil allocation for distributed learning students enrolled in blended DL courses be set at the same level as regular school-aged base per pupil allocation.

Adult Graduated Student Funding

Programs for graduated adults are critical to providing access to education upgrading for many students throughout the province but they are no less costly to provide than in other educational settings. In addition providing funding for these students as a supplemental grant means that there is no certainty regarding this funding from year to year.

Adult students who have graduated are not eligible for special needs funding.

For graduated adult students 50% of course funding is based on eligible enrolments reported through 1701 data collection and 50% of course funding is based on course completions reported through SADE data collection. This creates additional operational uncertainty for school districts.

Recommendation 10: It is recommended that the basic per pupil allocation for graduated adult students be set at the same level as regular school-aged base per pupil allocation, and that 100 % of funding be provided based on the graduated adult FTE reported through 1701 data collection , and that the Education Guarantee grant be included in the operating grant for school districts.

Funding Protection, Rural District Base Funding and Geographic Location Factors - It appears funding protection has been extended well beyond what was originally intended in the absence of a formula to ensure an assured minimum level of funding for rural districts. There certainly are minimum costs involved in running any school district. These should be established and some assurance provided to rural districts in particular to ensure their basic costs are covered. Of course the geographic location factor funding should also be continued to address the unique needs of rural and remote operations.

Recommendation 11: It is recommended that funding protection be continued but only if it is phased out over a reasonable number of years, that a minimum level of funding be established for rural districts, and that the geographic location factor be continued.

Stable and Predictable

Administrative Savings Grant - The funding reduction related to the administrative savings requirement of a few years ago was partially reversed in 2016/2017 in the form of a special grant. Administrative savings should be returned to the school districts by reinstating the full operating grant allocation (increase operating grants by \$54 million).

Recommendation 12: It is recommended that the administrative savings line be removed from the operating grant formula by transferring the return of administrative savings grant from a special grant into the operating grant. It is further recommended that the full \$54 million be returned to the operating grant.

Student Transportation Fund – The Student Transportation Fund was introduced in 2016/2017 as a special grant to support the elimination of student transportation fees. If the intention of the Ministry of Education is to mandate student transportation services, a distinct formula for allocating student transportation funding should be developed as part of the operating grant.

Recommendation 13: It is recommended that the Student Transportation Fund be incorporated within the operating grant, and that, if the intention of the Ministry of Education is to mandate student transportation services, a distinct formula for allocating student transportation funding be developed as part of the operating grant.

Pay Equity Grant - The Pay Equity Grant is a legacy grant maintained outside of the operating grant. This grant no longer reflects the cost differential that it was meant to address.

Recommendation 14: It is recommended the Pay Equity grant be incorporated in the operating grant formula and distributed based on a rational allocation formula that reflects the spirit of pay equity.

Support Staff Portion of Learning Improvement Fund Grant - The Support Staff Portion of Learning Improvement Fund Grant was introduced in connection with provincially negotiated collective agreements and is set to expire in 2019. This grant has enabled our school district to increase the hours of work for our Education Assistants and improve the services we provide to students with special needs.

Recommendation 15: Subject to upcoming negotiations with support staff unions, it is recommended the \$20 million support staff portion of the Learning Improvement Fund grant be incorporated in the operating grant formula as part of increased allocations for students with special needs. (see recommendation 5)

Inflation and identifiable increased costs - School districts do not have taxing authority and, therefore, do not have the ability to increase revenues to respond to increasing costs. The provincial government must do that for Boards of Education. Instead, we have continued to experience government surprises like the recently announced Employer Health Tax for which no additional funding has been announced. This has been added to normal inflationary pressures, including exempt staff wage increases which also were not addressed in the recent budget. Without additional funding districts are required to absorb these costs, which necessarily results in cuts to educational services for students. This has been one of the most consistent recommendations of the Select Standing Committee on Government Services and Finance, to ensure adequate funding is provided in the provincial budget for Boards of Education to cover increasing costs which are not within their mandate or authority to control. Unfortunately, the recommendation seems to have been ignored by both the previous and current provincial government.

Recommendation 16: It is recommended the provincial government provide funding to offset increased costs like the employers health tax and cover unfunded inflationary costs like provincially negotiated benefit plan cost increases.

Recommendation 17: It is recommended that the provincial government prepare a three year rolling operating and capital budget that addresses inflationary pressures and anticipated cost increases, making commitments for funding in advance so districts can plan accordingly.

Flexible

Operating Funding – Create flexibility by providing more funding through the operating grant and less funding that is targeted or distributed through special grants that are uncertain from year to year. Several of the previous recommendations address this approach.

Transparent

The current funding formula is very complex and not easily understood by the public or even by people within the K-12 system. We believe that for an operating grant formula to be transparent, it needs to be understandable and understood by its users and the public.

Recommendation 18: It is recommended that the new funding model be developed and documented in a way that ensures clarity and understandability on the part of the users and the public.

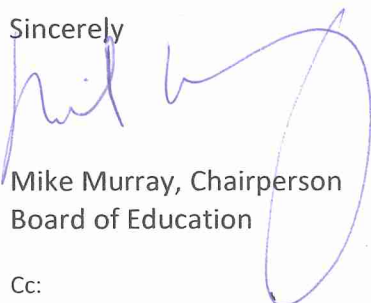
Accountable

A three year rolling budget and the reduction of targeted grants in favour of greater operating grant funding would likely be more efficient and simplify the budgeting and reporting requirements. Whatever practices are adopted, compliance audits will still be required.

Recommendation 19: It is recommended that the compliance audit program be updated to reflect any changes implemented through the new funding formula.

Thank you for your time and for considering our recommendations.

Sincerely



Mike Murray, Chairperson
Board of Education

Cc:

Board of Education, School District 42 - Maple Ridge and Pitt Meadows
The Honourable Rob Fleming, Minister of Education
The Honourable, Carole James, Minister of Finance
The Honourable Lisa Beare, Minister of Tourism, Arts and Culture
Mr. Bob D'Eith, MLA
Ms. Sylvia Russell, Superintendent of Schools
Ms. Flavia Coughlan, Secretary Treasurer
Ms. Cathie Watkins, President Maple Ridge Principals and Vice Principals Association
Mr. George Serra, President, Maple Ridge Teachers Association
Ms. Leslie Franklin, President, CUPE local 703
Ms. Kim Dumore, Chair, District Parent Advisory Council
Student Voice
Mr. Gordon Swan, President, BCSTA
All Boards of Education