

The Ministry of Education's K-12 Public Education Funding Allocation System Review:

Submissions of the Conseil scolaire francophone de la Colombie-Britannique

School District No. 93 (Conseil scolaire francophone de la Colombie-Britannique)

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1. Introduction

- [1] The Conseil scolaire francophone de la Colombie-Britannique (the "CSF") submits this report to the Ministry of Education (the "Ministry") to assist with the Ministry's ongoing K-12 Public Education Funding Allocation System Review.
- [2] The Ministry's current Funding Allocation System does not respond to the unique operational needs of the CSF, which is the only school board mandated to provide French-first language instruction to communities across the province. Successive governments have recognized the CSF's uniqueness such that some adjustments have been made to the Funding Allocation System formulae as applied to the CSF. However, the CSF-specific adjustments apply general increases to the CSF's operating funding as otherwise determined by the standard formulae and are therefore not flexible enough to address the CSF's actual needs.
- [3] The CSF understands that a six-member independent review panel has been established to assist the Ministry to "provide equitable and predictable funding to boards of education". According to the Ministry's press release on this subject, "[a] new funding model should also look to better support vulnerable students, including children in care, children with special needs and Indigenous students, as well as rural and remote school districts, and those with fast-growing student populations."²
- [4] The CSF further understands that the independent review panel will consult with key education stakeholders, including reviewing written stakeholder submissions,³ throughout the spring of 2018, and that its work will be guided by the following criteria:
 - a. Responsive allocate available resources among boards of education in consideration of unique local and provincial operational requirements;
 - b. Equitable facilitate access to comparable levels of education services and opportunities for individual students throughout the province;
 - c. Stable and Predictable support strategic, multi-year planning for educational programming and school district operations;
 - d. Flexible Respect the autonomy of, and not unnecessarily restrict, individual boards of education in the spending of their funding allocations to further student success;

https://www2.gov.bc.ca/assets/gov/education/administration/resource-management/k12 funding/funding-model-review/funding-model-review-independent-terms-of-reference.pdf.

¹ Ministry of Education Information Bulletin, *Finding a better way to support school districts, student success*, March 1, 2018, available online: https://archive.news.gov.bc.ca/releases/news_releases_2017-2021/2018EDUC0004-000306.htm. See also the Terms of Reference, Independent Review Panel for the K-12 Public Education Funding Allocation System Review, February 14, 2018 – August 31, 2018 [Independent Review Panel Terms of Reference], available online:

² Ministry of Education Information Bulletin, *Finding a better way to support school districts, student success*, March 1, 2018.

³ Independent Review Panel Terms of Reference, p 2.

- e. Transparent calculate funding using a clear and transparent methodology; and
- f. Accountable allocate resources to boards of education in the most efficient manner and ensure that resources provided are being utilized as intended.⁴
- [5] Thus, the purpose of this report is to assist the Ministry and the independent review panel in understanding the CSF's unique operational needs to ensure that changes to the Funding Allocation System will respond to those needs and ultimately result in stable and predictable funding to support the CSF in fulfilling its mandate.

2. The CSF's unique characteristics: a backdrop to its funding needs

[6] The CSF is unique from other school districts operating in British Columbia in its purpose, structure, and financial needs. The CSF is mandated to provide French-first language instruction to select eligible students throughout the province. In order to fulfill its linguistic and cultural mandate province-wide, the CSF has funding needs that are different from other school districts in British Columbia, which unique needs have been recognized by successive governments and by the courts.

2.1 The CSF's unique purpose

- [7] The CSF is British Columbia's only province-wide school district, and the only school district that offers the French-first language elementary and secondary education guaranteed in British Columbia by s. 23 of the *Canadian Charter of Rights and Freedoms* (the "*Charter*"). The CSF offers that education to eligible students in communities where the number of such students warrants that instruction.
- [8] The particular purpose of French-first language instruction (in addition to the basic educational purpose shared by all school districts) is to transmit the French language and culture to future generations and to protect against assimilation in an environment that is predominantly English-speaking. French-first language schools are guaranteed by the *Charter* in British Columbia because for minority language communities, schools are a primary instrument of linguistic and cultural transmission. Although many English-language schools also provide social gathering space, French-first language schools throughout British Columbia not only serve as community centres, but are the most vital (and often only) institution favouring the survival of the French-speaking minority in any given area.
- [9] It is also important to distinguish the CSF's French-first language programming from French immersion programming, which is offered by some English-language school

⁴ Ministry of Education Information Bulletin, *Finding a better way to support school districts, student success*, March 1, 2018.

districts in British Columbia. A French-first language program is designed to help transfer the French language and culture to students so that they become and remain a part of that community, despite the dominance of English in everyday life. On the other hand, a French immersion program is designed for English speakers in an English-language majority school environment and teaches French as a second or third language.

2.2 The CSF's unique provincial structure

- [10] A further particularity of the CSF is that it is the only school district in British Columbia that is structured to serve various communities, both urban and rural, throughout the province. That is, the CSF's service areas are not constrained to any particular region or municipality as is the case with most English-language school districts; the CSF's territory is the entire province.
- [11] The CSF's province-wide structure, combined with the fact that it serves select eligible students, means that its student population is widely dispersed throughout the province. This is true even where the CSF operates a school serving an urban community, such as in Vancouver or Victoria. The CSF's urban catchment areas are very large and students attending these CSF schools are scattered throughout the catchment area, giving these urban catchment areas the hallmark characteristics of rural communities. Thus, students attending CSF schools, whether rural or urban, often have much longer commuting times than their English-language school counterparts.
- [12] The maps attached as **Appendix "A"** illustrate some of the CSF's catchment areas as they existed in the 2012/13 school year (maps of the catchments areas in Vancouver, Coquitlam, Sechelt, Nelson, and Victoria are provided as examples). These maps illustrate the dispersed nature of the CSF's student populations in both rural and urban communities.⁵

2.3 The CSF's unique funding needs arising from its constitutional purpose and province-wide structure

- [13] As a result of its unique constitutional mandate and its province-wide structure, the CSF has different funding needs than other school districts in British Columbia. These unique funding needs have been recognized by successive governments and by the courts.
- [14] First, the CSF incurs additional operating costs in order to implement the programs necessary to uphold the Province and CSF's constitutional obligations, including professional, educational, and cultural and linguistic programs. The CSF also

⁵ These maps were created using data from the 2012/13 school year and thus do not reflect the home addresses of the CSF's entire current student body. The maps also do not reflect some recent changes to the CSF's catchment areas (for example, the opening of two annex schools in Vancouver).

incurs additional expenses in order to ensure its schools are accessible. For example, the CSF must provide transportation services to its dispersed population, including in urban areas where students attending English-language schools may be able to walk.

- [15] Second, the CSF also serves communities across the province with differing needs. While English-language school districts differ from one another in part because they serve different types of communities (for example, rural versus urban communities), the CSF, as one school district, must be able to accommodate the needs of different communities.
- [16] The Ministry's recently released Draft British Columbia Rural Education Report 2017 (the "Rural Education Report") acknowledges the unique needs of rural school districts, including with regards to transportation, staff recruitment and retention, accessibility to comparable educational programming and extracurricular programs, and funding approaches. The report finds that "[a]lthough the current funding model provides supplements for rural school districts, funding based primarily on enrolment does not reflect the higher costs of delivering comparable programs and services in low enrolment and remote environments", and recommends that the Ministry "[c]ontinue to provide targeted funding outside of regular operating grants to address unique rural issues, such as transportation and housing."
- [17] The Rural Education Report then goes on to recommend that the Ministry undertake a comprehensive review of the Funding Allocation System to better reflect the operational and educational realities of operating schools in rural and remote communities. Now that the Ministry is undertaking such a review, it is important to also account for the uniqueness of the CSF, which serves rural communities throughout the province, as well as dispersed populations (the hallmark of a rural community) within urban settings.

3. How the Ministry's Funding Allocation System currently attempts to address the unique needs of the CSF

[18] Despite being unique from all other school districts, the Ministry has determined that the CSF is to be funded in the same way as all other school districts, that is, by way of the Funding Allocation System. The CSF receives enrolment-based funding: a baseper student funding amount, determined annually by the Ministry, that is multiplied by the actual number of students enrolled at the CSF's schools. The CSF's operating funding is also supplemented by certain of the Ministry's established supplementary funding

⁶ Draft British Columbia Rural Education Report 2017, prepared by Linda Larsen, Parliamentary Secretary for Rural Education, available online: http://s3.documentcloud.org/documents/4411779/Draft-Rural-Education-Report-2017.pdf [Rural Education Report], pp 6, 11.

⁷ Rural Education Report, p 10.

⁸ Rural Education Report, p 10.

grants, as they pertain to the CSF pursuant to the Ministry's Operating Manual. The chart attached as **Appendix "B"** summarizes the Operating Grant Allocation Formula.⁹

- [19] To account for some of the CSF's unique characteristics, the Ministry has made some deliberate adjustments to how the Funding Allocation System formula is applied to the CSF. For the most part, however, the adjustments have been applied in an arbitrary manner across all of the CSF's communities, such that they do not actually account for the CSF's unique circumstances or the CSF's individual community needs.
- [20] In addition to the adjustment to the CSF's Student Location Factor (discussed in detail below), the CSF receives a 15% operating grant supplement, which is intended to address some of the unique additional costs the CSF incurs to implement programs to fulfill its constitutional mandate. Between 2004 and 2006, the CSF sought such additional funding from the Ministry, submitting a report in March 2006¹¹ concluding that the CSF would need a 25% increase to its operating funding to put the necessary cultural and linguistic programs in place and to make its schools accessible. After some consideration, in 2006, the Ministry implemented a 15% supplement instead of the 25% the CSF requested. While the 15% supplement has assisted the CSF in funding certain cultural and linguistic programs, it does not provide enough funding to supplement the CSF's transportation costs.
- [21] The adequacy of the 15% CSF supplement has not been reviewed since being implemented in 2006, despite the CSF's May 2006 Report to the Ministry proposing that the supplement be reviewed in 2010.¹³ In any event, the need for any specialized CSF supplement will need to be evaluated in light of any changes made to the Funding Allocation System following the Ministry and the independent review panel's review.
- [22] Lastly, the Student Location Factor, which provides funding to school districts based on standard student enrolment and the school-age population density of communities within that district, is also adjusted as it applies to the CSF. The Ministry has recognized that the established formula for calculating each school district's Student

⁹ Overview of the 2013/2014 Operating Grant Allocation Formula (provided to the CSF by the Ministry). The Funding Allocation System has remained the same since 2013/14 such that, though dated 2013/14, this chart remains a relevant summary of the operating grant formula.

¹⁰ See the chart at **Appendix "B"**, Overview of the 2013/14 Operating Grant Allocation Formula (bottom right hand corner).

¹¹ Report to the Ministry of Education entitled Funding Requirements for Minority Language Education, March 2006. The CSF had also submitted an earlier report to the Ministry: Funding for Francophone Education: Challenges Facing the Conseil Scolaire Francophone, prepared by Trillium Business Strategies Inc, May 2005.

¹² Letter from Emery Dosdall, Deputy Minister, Ministry of Education to Jean Watters, CEO of the Conseil scolaire francophone de la Colombie-Britannique, dated October 10, 2006 (Ref. 115415).

¹³ Report to the Ministry of Education entitled Funding Requirements for Minority Language Education, March 2006, p 16.

Location Factor does not account for the CSF's dispersed student population. In an attempt to compensate, the Ministry multiplies the Student Location Factor for the CSF by 5 (the "CSF factor") to increase funding generated by that supplement. However, as is described in detail in the next section, the CSF factor was created as an arbitrary fix and thus does not account for actual individual community needs, nor does it generate enough funding overall to support the CSF's transportation system.

4. The Student Location Factor does not address the CSF's transportation needs even when the CSF factor is applied

4.1 The CSF must offer transportation services to ensure its schools are accessible

- [23] In order to make its schools more accessible, the CSF attracts eligible families by providing transportation services to its dispersed student population. Transportation free-of-charge is essential for French-language education to flourish, as eligible families usually have closer options in the English-language schools.
- [24] The CSF's transportation policy provides that transportation services are to be organized in such a way that school bus travel times are equivalent to the travel times of students attending an English-language school. Although the CSF provides transportation services to all students eligible under its policy, the level of service the CSF offers is limited by its transportation budget. Thus, the CSF's ability to provide accessible education varies from community to community.

4.2 The Student Location Factor

[25] The Student Location Factor, introduced into the Funding Allocation System in March 2012, builds transportation funding into the per-student funding formula as one of the Unique District Factors. As described in the 2017/18 Operating Grant Manual, a school district's Student Location Factor is calculated based on: (1) the Small Community Supplement's community clusters; (2) the school-age population for each community cluster as determined based on the 2011 Census; and (3) the number of school-age Full Time Enrolment ("FTE") students enrolled in standard schools from the previous school year, which is weighted according to the community cluster's school-age population density.¹⁴

[26] As the only Unique District Factor that accounts for the costs imposed by the dispersion of a school district's population, the Student Location Factor is a particularly important part of the per-student funding formula for the CSF. Given the Province and CSF's constitutional obligation to ensure accessibility to its schools, any funding

¹⁴ Also see the chart at **Appendix "B"**, Overview of the 2013/14 Operating Grant Allocation Formula (bottom right hand corner).

allocated to the CSF for transportation funds a necessary service. Thus, to the extent that the CSF incurs a transportation deficit as a result of the Ministry's Student Location Factor formula, it must draw from its general operating funds to make up the difference.

[27] Indeed, the CSF is not the only school district receiving insufficient funding for necessary transportation services. The Rural Education Report reported that "[t]ransportation was discussed at every regional open house. Participants suggested that it is impossible to think of a rural school district operating without transportation. Contributors indicated that prior to the Student Transportation Fund a range of bus reductions or fees were considered in many rural areas. They warned that the funding did not offset all of the costs of transportation." As is explained in the following section, the CSF's own transportation supplement – the CSF factor – also does not offset the costs of the CSF's necessary transportation services.

4.3 The CSF Factor

- [28] The Student Location Factor formula, as originally established, does not account for the CSF's unique circumstances. Population density plays a very significant role in determining the amount received under the Student Location Factor because this factor was designed to provide more funding to school districts with schools serving sparsely populated communities. In order to meet this goal, community clusters were weighted based on their school-age population densities, with the community cluster weight decreasing as school-age population density increases.
- [29] The Ministry has never calculated the population density of school-aged children eligible to attend a CSF school in any region or community cluster, and thus, the total school-age population density is used to calculate the CSF's funding pursuant to the Student Location Factor. These population densities completely ignore the CSF's circumstances. The Student Location Factor relies on the school-aged population density for certain community clusters as determined by the Census. It takes into account the density population of <u>all</u> school-aged children within a given community cluster, irrespective of whether they are eligible to attend a CSF school. The density of the CSF's student population within any given community cluster is evidently much lower than that of the total population of school-aged children in that same area, as evidenced by the maps attached as **Appendix "A"**.
- [30] When the Ministry established the Student Location Factor, it conducted tests using the new formula to determine how school districts fared as compared to the funding generated by the former "Supplement for Transportation and Housing", which funded transportation based on actual costs. At that point, it became apparent to the Ministry that

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¹⁵ Rural Education Report, p 41.

the CSF would receive comparatively less under the Student Location Factor than it had previously received under the Supplement for Transportation and Housing, the latter having reflected the actual cost of the CSF's transportation system in 2001/02 (before the Ministry froze the Supplement for Transportation and Housing).

[31] To address the discrepancy between the funding the CSF had received under the Supplement for Transportation and Housing in 2001/02 and the decreased levels of funding the CSF would receive under the Student Location Factor, the Ministry determined that multiplying the CSF's Student Location Factor supplement by 5 (the CSF factor) would close the gap. The Ministry continues to multiply the Student Location Factor by 5 for the CSF, but the CSF's transportation system has grown significantly (as its student population has grown), and this adjustment does not close the gap between what the Student Location Factor formula generates before the CSF factor is applied, on the one hand, and the CSF's actual transportation costs, on the other. Thus, even when adjusted with the CSF factor, the Student Location Factor does not adequately address the transportation funding needs of the CSF, leaving the CSF to supplement its transportation funding by drawing from other aspects of is operating funding.

4.4 The Student Location Factor formula generates distorted funding results for the CSF's communities and the CSF Factor does not offset the CSF's overall transportation costs

- [32] Because the Ministry relies on the total population densities of school-aged children to calculate the Student Location Factor for each CSF community, the individual results for each community are distorted as compared to what the CSF actually spends on transportation. That is, the Student Location Factor does not generate transportation funding for each of the CSF's communities that reflects those communities' actual transportation costs.
- [33] Attached as **Appendix "C"** to this report is a table listing the funding the CSF received by community for the 2017/18 school year pursuant to the Student Location Factor. The Student Location Factor amounts included in the table have already been adjusted using the CSF factor. The table also lists the CSF's budgeted transportation costs by community. Thus, **Appendix "C"** illustrates the gap that exists between the CSF's actual transportation costs and the funding it receives pursuant to the Student Location Factor to address those costs.
- [34] As an example of the distorted results generated by the Student Location Factor, consider the difference in funding received for Vancouver and Sechelt, as compared to the actual costs of providing transportation services in those communities.

- [35] In Vancouver, there are 856 elementary students enrolled at the CSF's four elementary schools (École Anne-Hébert and its annex at the Vancouver School Board's former Chief Maquinna¹⁶ and École élémentaire Rose-des-vents and its annex at the Vancouver School Board's former Henderson Annex).¹⁷ The CSF provides transportation services to most of its elementary students in Vancouver because, as the maps at **Appendix "A"** illustrate, the students' homes are dispersed throughout the large catchment areas.
- [36] Because the Student Location Factor for the CSF's schools in Vancouver is calculated using the total population density of school-age children living in Vancouver, the formula does not account for the CSF's dispersed student population. Even when multiplied by the CSF factor, the Student Location Factor only generates \$44,298 for transportation services for elementary students attending CSF schools in Vancouver. Meanwhile, for the 2017/18 school year, the CSF has budgeted (and is on track to spend) \$1,365,660¹⁹ for those services.
- [37] Conversely, for Sechelt, where the CSF operates one school with 67 elementary students, the Student Location Factor generates twice as much transportation funding as for Vancouver; the CSF received \$86,681 pursuant to the Student Location Factor for Sechelt in 2017/18. Meanwhile, the CSF has budgeted (and is on track to spend) \$62,963 in transportation for elementary students in Sechelt.
- [38] The disparity between what the Student Location Factor formula generates for Vancouver versus Sechelt is just one example of how the formula does not work for the CSF. The formula generates more funding for many other smaller school communities than it does for Vancouver see, for example, the results at **Appendix "C"** at the elementary level for Prince George (\$119,025), Powell River (\$137,138), and Penticton (\$173,363). The CSF has far fewer students and thus far fewer bus routes in all of these communities than it does in Vancouver.
- [39] There are some communities where the Student Location Factor formula generates more transportation funding than is actually spent on transportation services. Sechelt is an example, and as shown on **Appendix "C"**, there are other smaller communities where this is the case. However, these margins are slight, and do not make

¹⁶ For the location of this school, see number 8 on the map at page 2 of **Appendix "A"**. The CSF began leasing this school this year (2017/18) in order to accommodate overlow at École Anne-Hébert.

¹⁷ For the location of this school, see number 22 on the map at page 2 of **Appendix "A"**. The CSF began leasing this school this year (2017/18) in order to accommodate overflow at École Rose-des-vents.

¹⁸ See **Appendix "C"**.

¹⁹ The table at **Appendix "C"** shows a total budget of \$1,609,226 for transportation in Vancouver. \$243,566 of that budget is for the CSF's secondary students in Vancouver attending École Jules-Verne. As an additional point, the Student Location Factor generates \$203,227 in transportation funding for 314 secondary students in Vancouver (attending École Jules-Verne), much more than the \$44,298 it generates for the CSF's 856 elementary students in Vancouver.

up for the communities where the CSF receives considerably less than what it spends (in Vancouver alone the CSF is underfunded \$1,361,701). Indeed, the CSF has an overall transportation deficit of \$3,317,982 for the 2017/18 school year.²⁰

- [40] It is important to note that beginning in 2004, before the CSF's 15% supplement was implemented, the CSF made a number of difficult changes to its transportation system in order to decrease expenditures. For example, the CSF amended its transportation policy to replace its door-to-door transportation services with a group pick-up point system, which reduced the distance and bus time of the CSF's bus routes. The CSF also replaced a number of small buses with large buses to accommodate more students on fewer routes and to alleviate some of the pressure of increasing enrolment on the CSF's frozen transportation budget. Lastly, the CSF introduced a competitive bidding process to contract its bus services. The effect of these changes was to make the CSF's transportation system as efficient as possible.
- [41] Thus, while the Ministry has nominally attempted to adjust the Student Location Factor to fit the CSF's needs, the application of a blanket increase across the CSF's communities fails to account for those individual communities' transportation needs, and fails to generate enough transportation funding for the CSF overall. A new funding model must better account for the CSF's uniqueness. Most importantly with regards to transportation funding, a new model must account for the CSF's dispersed population, even in urban areas of the province. A model that funded actual transportation costs, like the former Supplement for Transportation and Housing Supplement, would provide responsive transportation funding that is stable and predictable. Indeed, as mentioned above, the Rural Education Report recommended that the Ministry continue to provide targeted funding for transportation and housing.²¹

5. The Ministry's current Funding Allocation System does not provide the CSF with funds for start-up schools

[42] In accordance with the CSF's mandate to provide programs where numbers warrant and where eligible parents request access to French-first language education, ²² the CSF's programs continue to grow across the province, including with the opening of new schools. The CSF continues to open new schools in communities where it already operates schools (for example, the CSF opened two annex schools in Vancouver for the 2017/18 school year), as well as in new communities where French-first language

²² Pursuant to section 23 of the *Charter* and according to the *School Act*, RSBC 1996 c 412.

²⁰ This report uses the 2017/18 school year as the most recent example of the CSF's transportation deficit, but the Student Location Factor (including the CSF Factor) has failed to generate enough funding to support the CSF's transportation system since being introduced. Thus, the CSF's transportation system has been chronically underfunded.

²¹ Rural Educatoin Report, p 10.

education did not previously exist (for example, the CSF opened a school in Fernie for the 2013/14 school year and in Revelstoke for the 2012/13 school year).

- [43] Many of the CSF's existing programs have started with few students and grown quickly. For example, at the request of eligible parents, the CSF opened a program in Kamloops in 2001/02 with enrolment of 12 students. This year (2017/18), 84 students are enrolled in that program. Similarly, at the request of eligible parents, the CSF opened a program in Nelson in 2006/07 with enrolment of 8 students. This year (2017/18), 85 students are enrolled in that program. Small starter programs such as these usually begin operating within a facility shared with an English-language school, or in a small rented space, and expand as needed.
- [44] In either case whether the CSF opens a new school in an existing CSF community or whether it opens a program in a new community there are costs associated with a starter program that are not accounted for by the Ministry's current Funding Allocation System. None of the supplements are intended to assist school districts in establishing new programs, and the base per-student funding formula does not generate enough money to even cover general operating costs such as teacher salaries and transportation services. Similarly, where the CSF opens an annex to alleviate overcrowding at another school, the Funding Allocation System does not account for the associated increased operational expenses. Such specialized funding does not exist primarily because other school districts are not mandated to establish new programs in the same way as the CSF. While the CSF receives a unique 15% supplement, this funding is not intended to fund start-up schools, nor does it provide adequate funding to do so.
- [45] It is important that the CSF receive adequate operating funding to allow new schools to grow, as this takes time, especially in smaller communities. On the other hand, the CSF does not expect to continue to invest money in a program that is not successful once given a legitimate chance. In determining what makes educational sense in terms of the CSF's starter programs, the Province and CSF's constitutional obligation must be a primary consideration. The CSF's starter programs must be given a chance to take hold in a community, with adequate support through operating funding, as the CSF's schools are the only option for French-first language education in British Columbia.

6. The current Funding Allocation System does not include funding to incentivize teachers to work at CSF schools

[46] Rural school districts have highlighted recruiting and retaining qualified staff for educational, administrative, and operational positions as one of their greatest challenges.²³ The CSF faces similar challenges, exacerbated by the facts that it operates rural schools across the Province, its staff must speak French, and it must compete

²³ Rural Education Report, p 10.

against urban school districts offering positions to French-speakers for their Frenchimmersion programs.

- [47] In response to the Rural Education Report's finding that rural school districts are struggling with recruiting and retaining staff, Parliamentary Secretary Larson (author of the Rural Education Report) and the Minister of Education (the "Minister") determined that immediate assistance was needed.²⁴ The Minister created a one-time \$1.5 million Rural and Remote Workforce Sustainability Fund (RRWSF) to help address the recruitment and retention priority in rural communities. An additional half million dollars has been provided to the British Columbia Public School Employers' Association to provide centrally-coordinated recruitment supports to rural school districts.²⁵
- [48] The federal government has also pledged to provide funding to address the recruitment and retention of teachers who teach French as a second language. This means federal funding supplements will be provided for English-language school districts to attract French immersion teachers. These federal funds would not provide funding to the CSF for recruiting and retaining teachers who teach French-first language education. Thus, it is important that the CSF's needs be addressed through the provincial operating budget.
- [49] It is important that school districts be able to respond to salary changes whether negotiated into collective agreements or needed on an individualized basis to recruit and retain specialized staff through their operating budget. For example, the CSF's difficulties in recruiting staff are not only due to the fact it operates schools in rural communities, but also because it needs to attract French-speaking teachers and other staff who also have the option of teaching at French immersion schools in more desirable communities (i.e. urban centers). The CSF requires flexibility in its operating budget to enable it to incentivize teachers and other staff to work at its schools.

7. The current Funding Allocation System does not provide adequate special education funding

[50] Many rural school districts have complained that lack of access to specialist services, long travel times, and high costs in rural schools and communities are contributing to long wait times for special needs assessments and, therefore, delays in receiving services. ²⁶ Again, these problems are exacerbated for the CSF because it serves several rural communities across the province, and because it must offer special needs assessments in French.

²⁴ Rural Education Report, p 12.

²⁵ Rural Education Report, p 12.

²⁶ Rural Education Report, pp 8, 35.

- [51] The Rural Education Report also raised the need for funding to support English as a Second Language programming.²⁷ Again, the need for specialized language training is exacerbated for the CSF. Its schools must offer Francization programs to transition some students into French-first education (some students come from an English-speaking home and need extra attention to bring their French up to speed) as well as to ensure that students' English-language skills are strong.
- [52] It is important that the Funding Allocation System respond to the province-wide need for greater funding for special education, but that it also be able to respond to school districts' unique needs including the CSF to ensure that comparable special education services can be provided across the province.

8. The Funding Allocation System must account for inflation

[53] The current Funding Allocation System does not account for inflation. Set rates of funding like the per-student base amount is not adjusted annually based on inflation. Therefore, school districts are actually losing per-student funding at the rate of inflation. Any changes to the Funding Allocation System should account for an inflation adjustment to ensure that school districts can continue to offer at least the same level of services from one year to the next.

9. The Funding Allocation System should remain untargeted unless funding is provided based on actual expenditures

- [54] As the Ministry's Operating Grants Manual explain, almost all operating funding provided by the Ministry is untargeted.²⁸ This means that school districts have autonomy in deciding how operating funds are spent, regardless of the particular supplement that generated the funding. The exception is funding provided for Aboriginal Education, which is fixed.²⁹
- [55] The CSF understands why Aboriginal Education funding is fixed, and does not suggest that any changes be made to that funding supplement. However, the fact that all other funding is provided untargeted gives school districts flexibility to address their individual needs, which is one of the guiding principles of the independent review panel's mandate.³⁰ It is important to recognize the unique operating funding needs of individual school districts, particularly the CSF because of its unique mandate and its province-wide structure.

²⁸ Operating Grants Manual, March 2017.

²⁷ Rural Education Report, p 28.

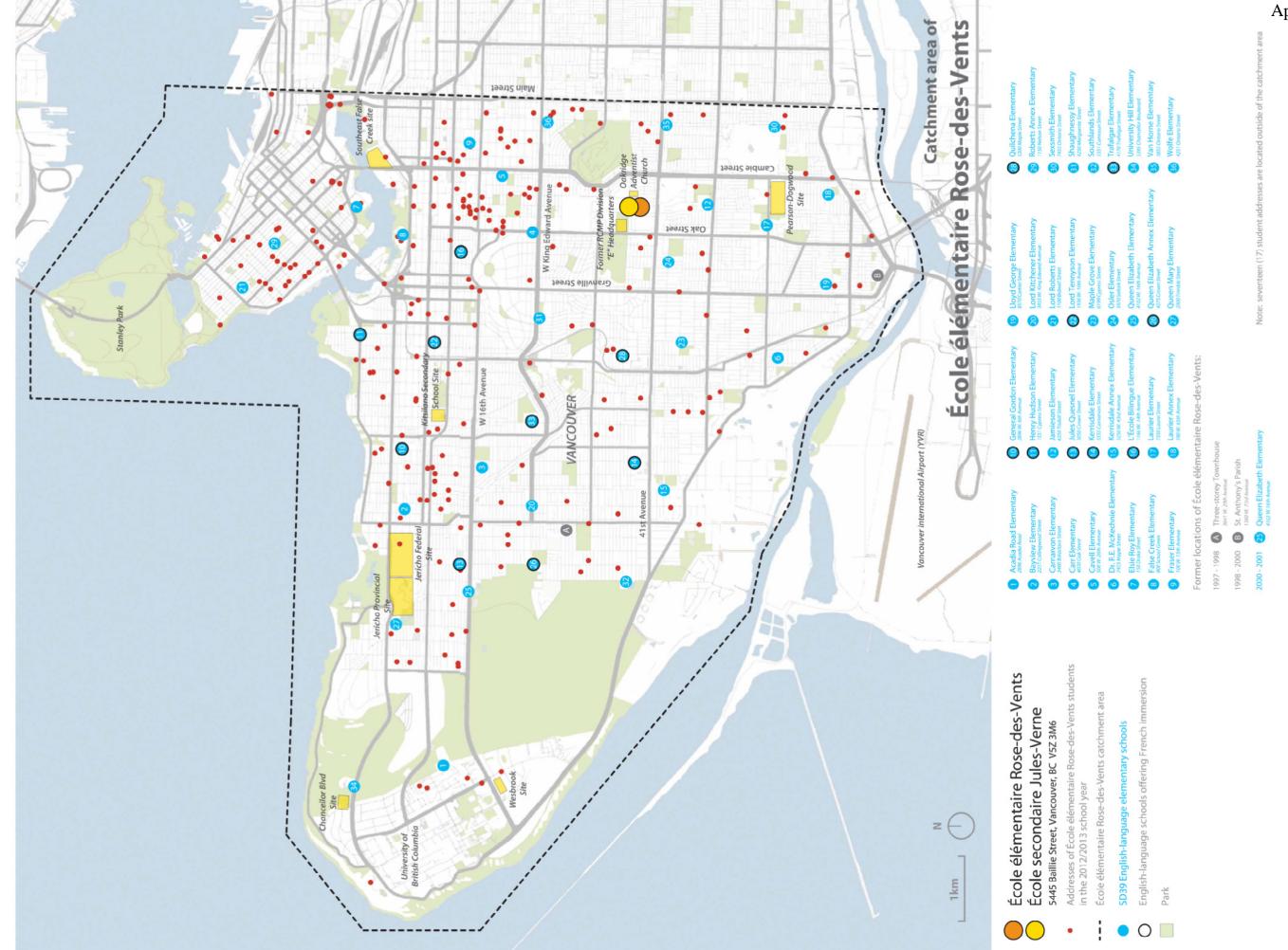
²⁹ Operating Grants Manual, March 2017, Tables 4a and b.

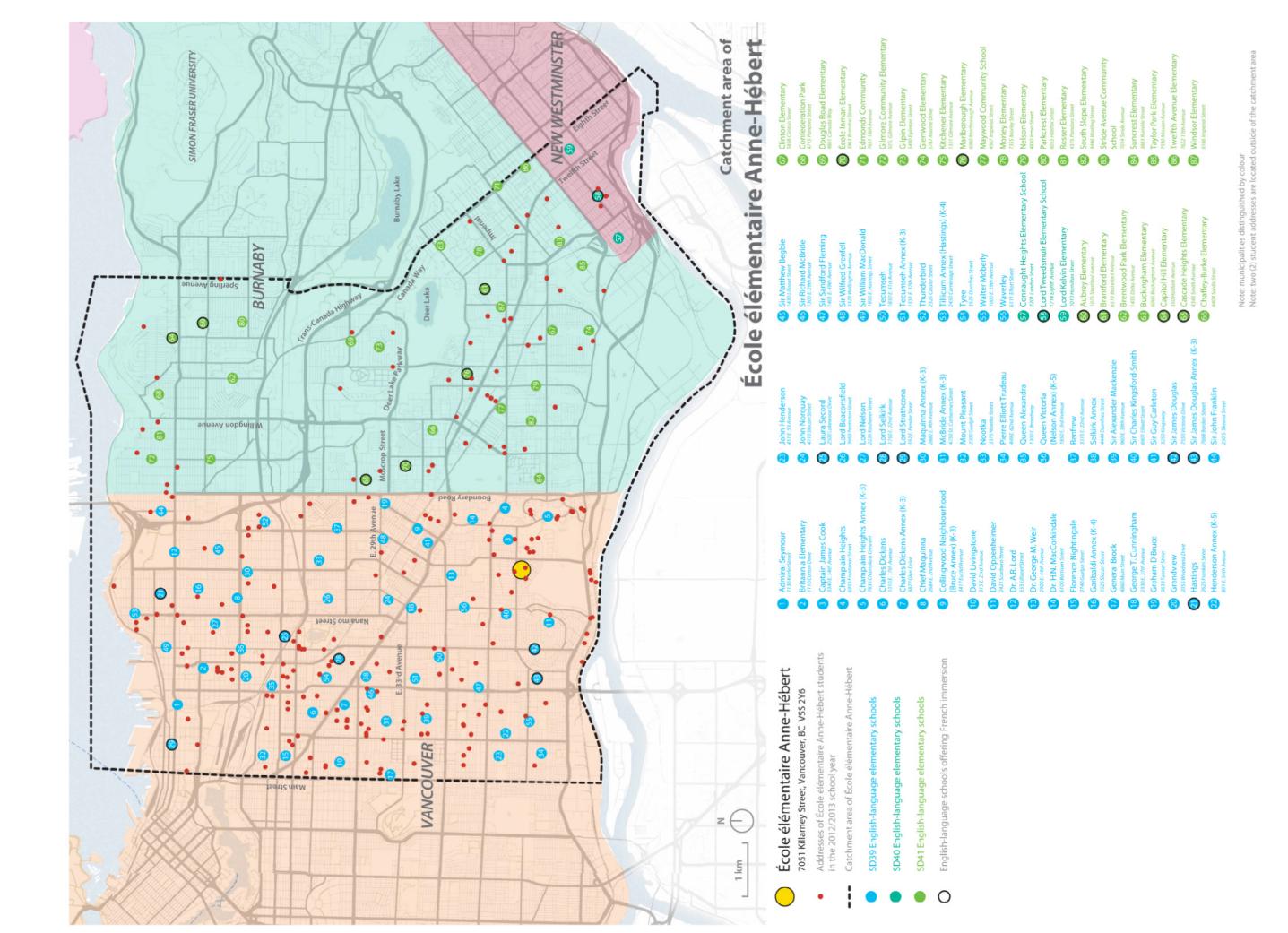
³⁰ Ministry of Education Information Bulletin, *Finding a better way to support school districts, student success*, March 1, 2018.

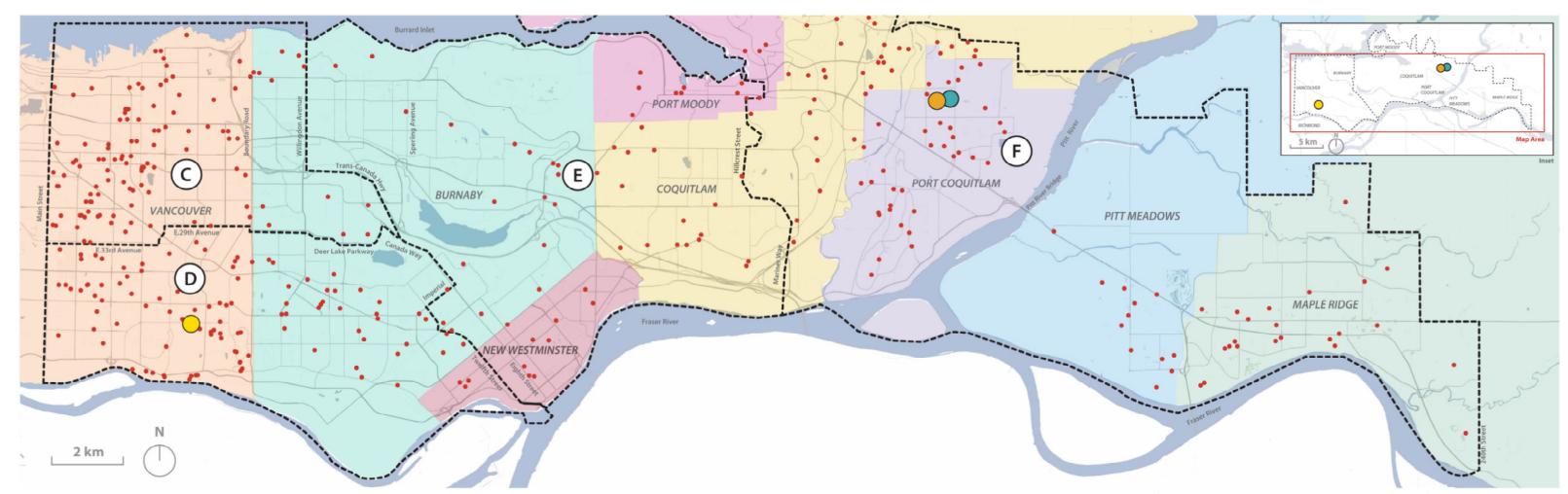
[56] Thus, the CSF requests that the Funding Allocation System continue to provide untargeted funding, with the exception of the Aboriginal Education Supplement, unless the Funding Allocation System is amended so as to provide funding based on actual expenditures.

10. Conclusion

- [57] Thank you for considering the CSF's submissions to assist the Ministry and the independent review panel's review of the Ministry's Funding Allocation System. Any further questions regarding the CSF's submission should be directed to Sylvain Allison, Secretary Treasurer, at sallison@csf.bc.ca or 604-214-2606.
- [58] The CSF looks forward to an amended Funding Allocation System that provides stable and predictable funding that meets the CSF's unique needs.







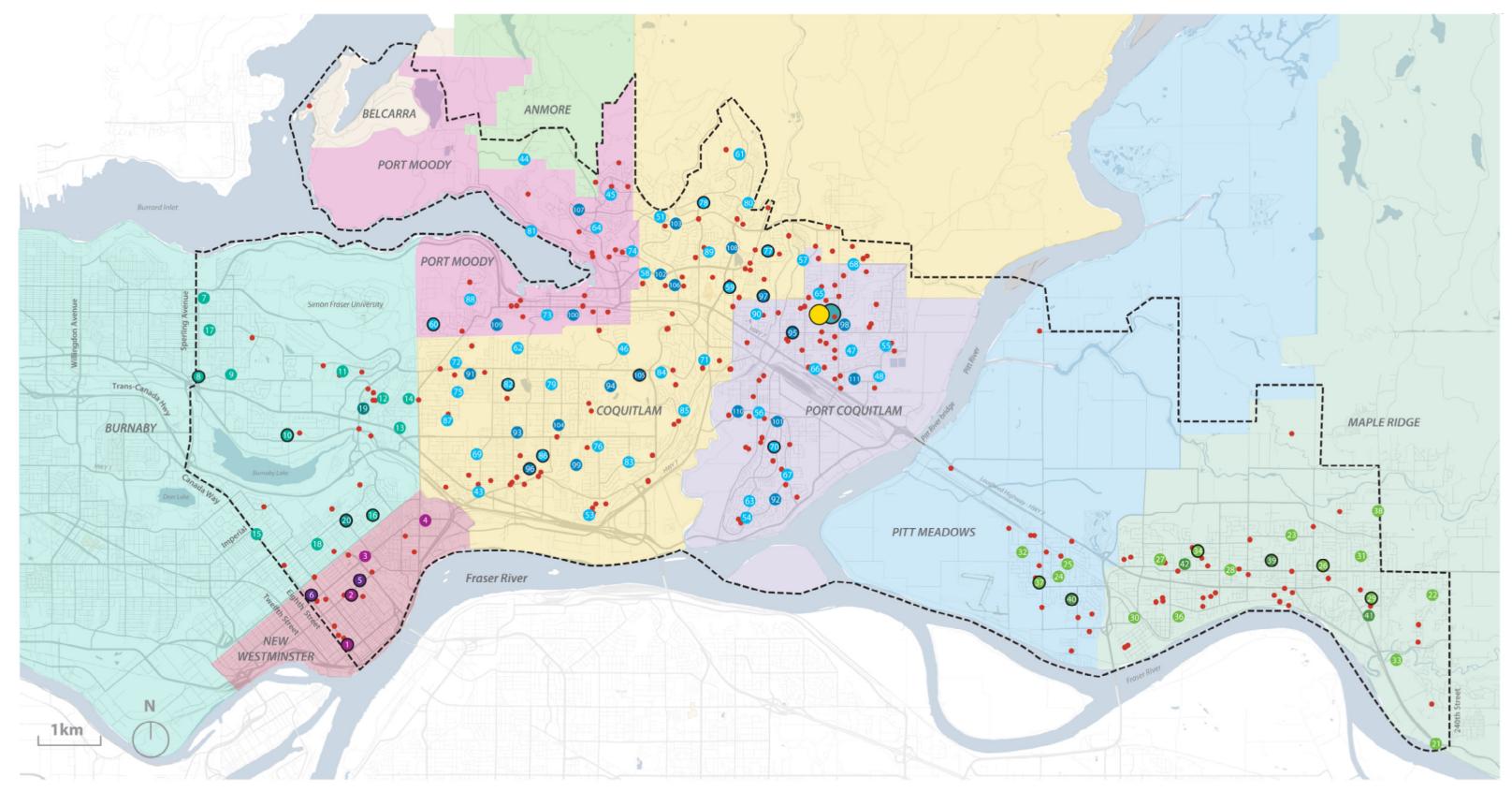
Proposed catchment areas for

CSF elementary students between Main Street in Vancouver and 240th Street in Maple Ridge

- École élémentaire Anne-Hébert 7051 Killarney Street, Vancouver, BC V5S 2Y6
- École des Pionniers
 3550 Wellington Street, Port Coquitlam, BC V3B 3Y5
- CSF Board office in Port Coquitlam
 3550 Wellington Street, Port Coquitlam, BC V3B 3Y5
- C Proposed catchment area for a CSF elementary school in Vancouver, east of Main Street (North)
- Proposed catchment area for a CSF elementary school in Vancouver, east of Main Street (South)
- Proposed catchment area for CSF elementary students (K-6) at École des Pionniers
- Proposed catchment area for a CSF elementary school in eastern Burnaby, central Coquitlam, northern New Westminster, and southern Port Moody

Note: municipalities distinguished by colour

Note: thirteen (13) student addresses are located outside of the catchment area





3550 Wellington Street, Port Coquitlam, BC V3B 3Y5

CSF Board Office in Port Coquitlam

3550 Wellington Street, Port Coquitlam, BC V3B 3Y5

 Addresses of École des Pionniers students in the 2012/2013 school year

•--- École des Pionniers catchment area

- SD40 English-language elementary schools
- SD40 English-language middle/secondary schools
- SD41 English-language elementary schools
- SD41 English-language middle/secondary schools

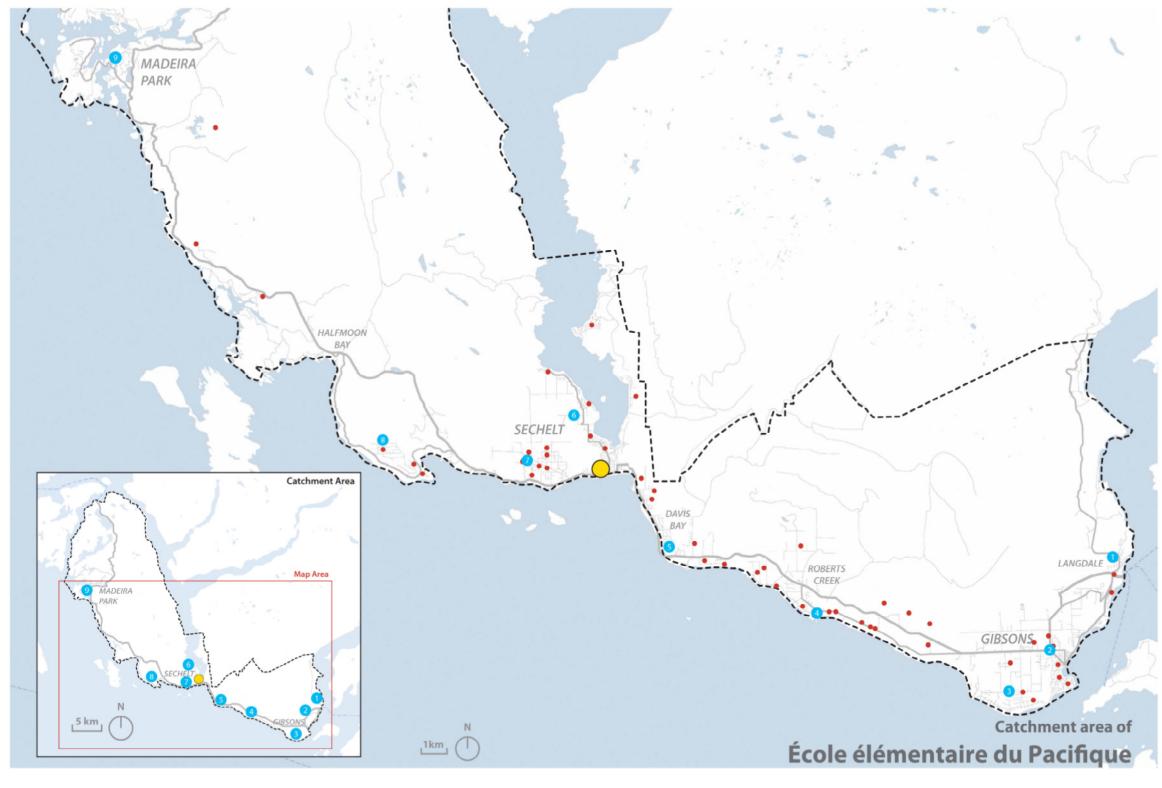
- SD42 English-language elementary schools
- SD42 English-language secondary schools
- SD43 English-language elementary schools
- SD43 English-language middle/secondary schools
- O English-language schools offering French immersion

Catchment area of

École des Pionniers (K-12)

Note: municipalities distinguished by colour

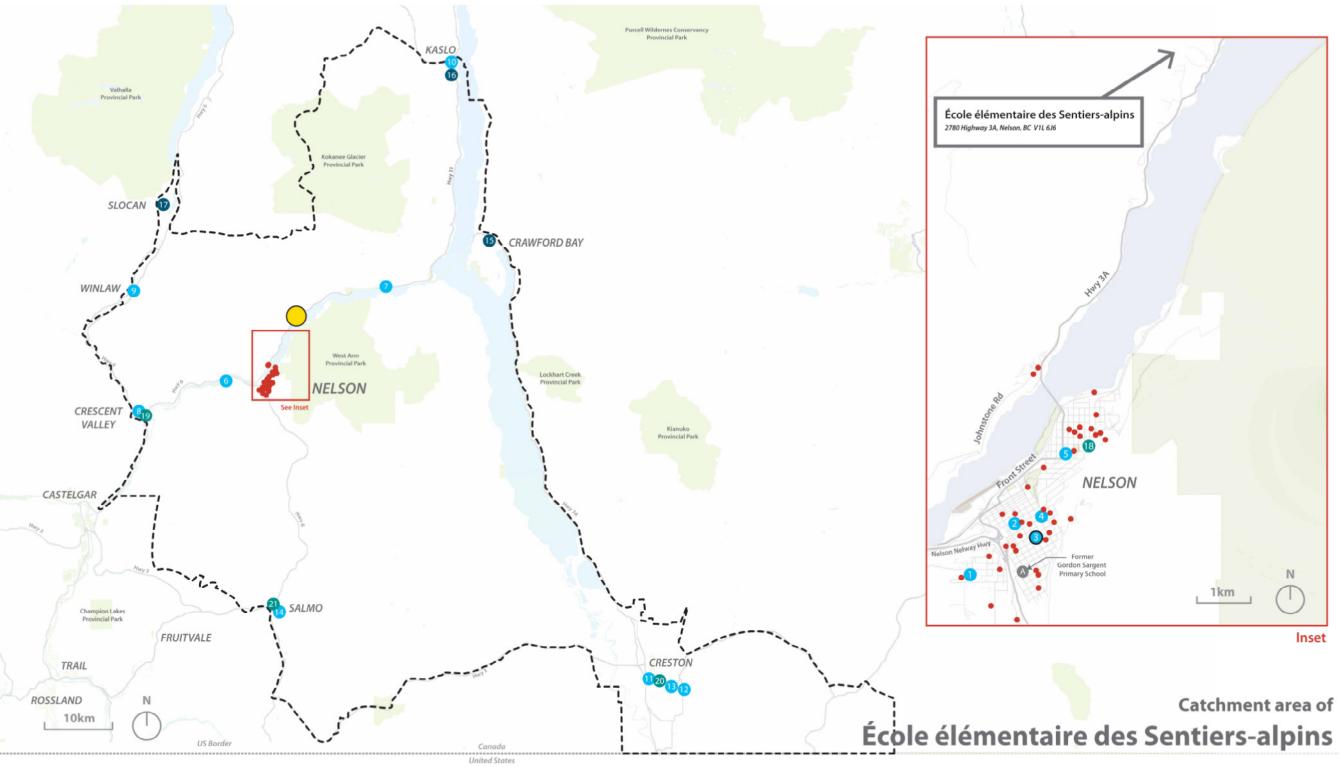
Note: thirteen (13) students live outside of the catchment area



- École élémentaire du Pacifique
 5538 Shorncliffe, Sechelt, BC VON 3A0
- Addresses of École élémentaire du Pacifique students in the 2012/2013 school year
- ---- École élémentaire du Pacifique catchment area
- SD46 English-language elementary schools

- Langdale Elementary School
 1551 Johnson Road, Gibsons
 100 July 100 July
- Gibsons Elementary School 783 School Road, Gibsons 22.6 km
- 3 Cedar Grove Elementary School 1196 Chaster Road, Gibsons
- 4 Roberts Creek Community Elementary School 1088 Roberts Creek Road, Roberts Creek
- 5 Davis Bay Elementary School
- 6 Kinnikinnick Elementary School 6030 Lighthouse Avenue, Sechelt
- West Sechelt Elementary 5609 Mason Road, Sechelt
- 8 Halfmoon Bay Elementary Community School 8086 Northwood Road, Halfmoon Bay
- Madeira Park Elementary School
 S012 Gonzales Road, Madeira Park

Note: distance from École élémentaire du Pacifique to English-language schools indicated below school address calculated using Google Maps distance calculator



École élémentaire des Sentiers-alpins 2780 Highway 3A, Nelson, BC V1L 6J6

- Addresses of École élémentaire des Sentiers-alpins students in in the 2013/2014 school year
- École élémentaire des Sentiers-alpins catchment area
- SD08 English-language elementary/middle schools
- SD08 English-language elementary/secondary schools
- SD08 English-language secondary schools
- English-language schools offering French immersion

- Rosemont Elementary
- Wildflower Elementary/Middle
- Trafalgar Middle
- 4 South Nelson Elementary
- 5 Hume Elementary
- 6 Blewett Elementary 2665 Blewett Road, Nelson 19 km

- Redfish Elementary
- 8 Brent Kennedy Elementary
- 9 Winlaw Elementary
- 10 Jewett Elementary
- Adam Robertson Elementary
 421 9 Avenue N RR 4, Creston
- 12 Erickson Elementary

- (13) Canyon Lister Elementary
- 14 Salmo Elementary
- 15 Crawford Bay Elementary-Secondary 16150 Walkley Road, Crawford Bay 35 km
- 16 J. V. Humphries Elementary Secondary 500 6th Street, Kaslo
- W.E. Graham Community School (K-10)
 915 Harold Street, Slocan
 81 km
- 18 L.V. Rogers Secondary

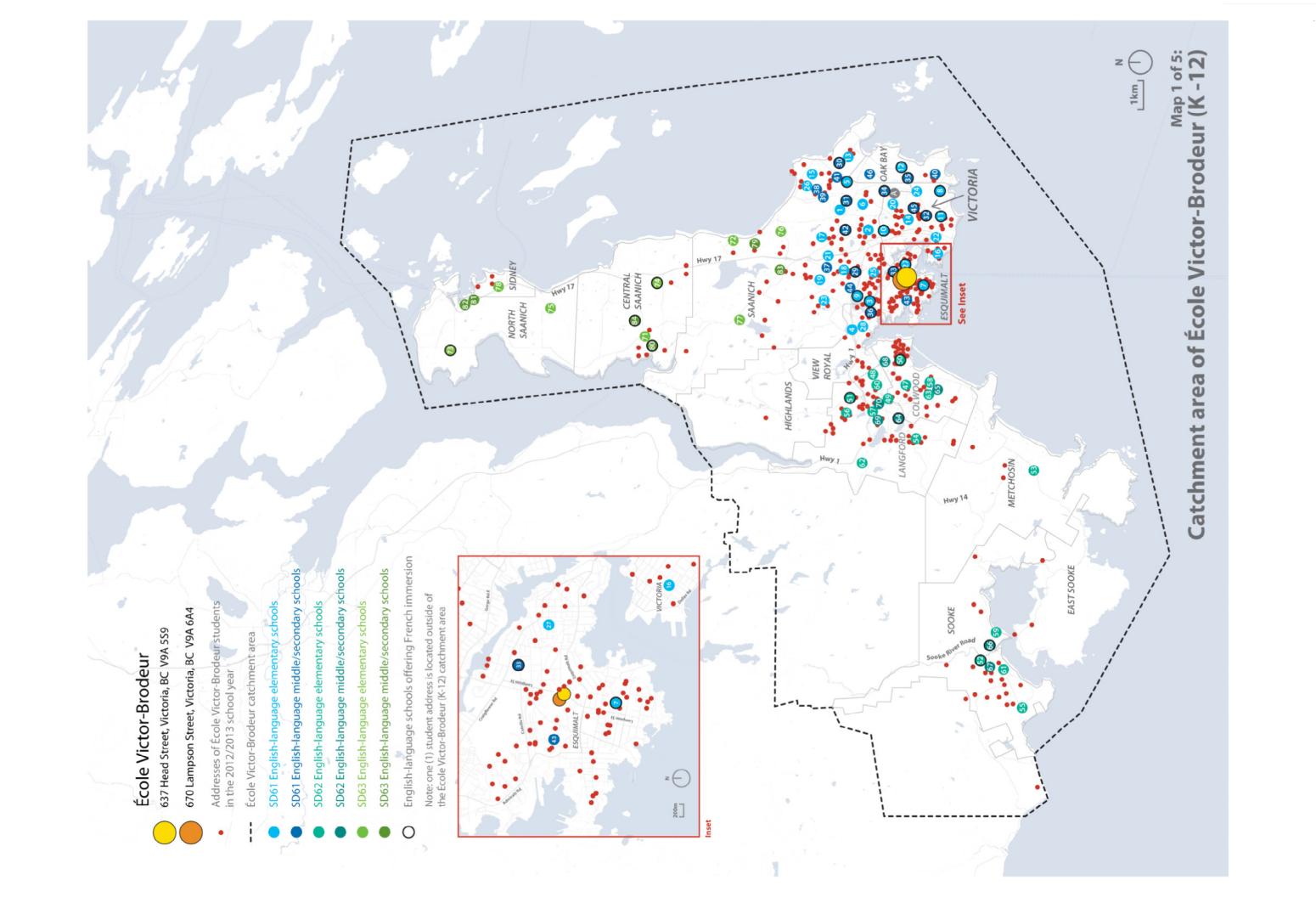
- 19 Mount Sentinel Secondary
- 20 Prince Charles Secondary 223 18th Avenue, South Creston 136 km
- 21 Salmo Secondary

Former locations of École élémentaire des Sentiers-alpins

2006-2008 2 Wildflower Elementary Middle

2008-2010 A Former Gordon Sargent Primary School 1623 Falls Street, Nelson 14 km

Note: distance from École élémentaire des Sentiers-alpins to English-language schools indicated below school address calculated using Google Maps distance calculator



Legend for École Victor-Brodeur maps

- Map 1 of 5: Catchment area of École Victor-Brodeur (K-12)
- Map 2 of 5: Proposed catchment areas for CSF elementary students in Greater Victoria (K-7)
- Map 3 of 5: Proposed catchment area for a CSF elementary school in Victoria West (K-7)
- Map 4 of 5: Proposed catchment area for CSF elementary students in Victoria Central (K-7)
- Map 5 of 5: Proposed catchment area for a CSF elementary school in Victoria East (K-7)
- SD61 English-language elementary schools
- SD61 English-language middle/secondary schools
- SD62 English-language elementary schools
- SD62 English-language middle/secondary schools
- SD63 English-language elementary schools
- SD63 English-language middle/secondary schools

English-language schools offering French immersion

École Quadra Elementary is located at 2780 Richmond Road for the 2013-2014 school year (Former location of Richmond Elementary School)

- Braefoot Elementary
- entary Cloverdale Traditional Ele
- Craigflower Elementary

École Campus View Elementary

Eagle View Elementary

École Doncaster Elementary

École Macaulay Elementary

École Margaret Jenkins Elen

École Marigold Elementary

o

45 Victoria High

44 Spectrum Community

43 Rockheights Middle

- 46 Victoria International High (Uplands Campus)
- Colwood Elementary 4
- 48 Crystal View Elementary
- 49 David Cameron Elementary
- (K-9)
- École Millstream Elementary
- S2 École Poirier Elementary
- 53 Hans Helgesen Elementary

École Sir James Douglas Elementary

École Willows Elementary

Frank Hobbs Elementary

George Jay Elementary

James Bay Community

Hillcrest Elementary

ake Hill Elementary

École Quadra Elementary 🗛

9

- Happy Valley Elementary
- John Muir Elementary
- Lakewood Elementary 8
- Ruth King Elementary 6
- Saseenos Elementary Sangster Elementary 8 8
 - Savory Elementary
 - 61 Sooke Elementary

Northridge Elementary

Oaklands Elementary

Rogers Elementary

McKenzie Elementary

- - Willway Elementary 65
- Wishart Elementary 8
- Belmont Secondary 4
- Dunsmuir Middle 65

Strawberry Vale Elementary

South Park Family Ele

Sundance Elementary

Fillicum Community

Torquay Elementary

- École Journey Middle

66 Edward Milne Community

68 Pacific Secondary

Victoria West Elementary

View Royal Elementary

Colquitz Middle

(2)

- Spencer Middle
- Westshore Learning Centre
- 71 Brentwood Elementary

École Arbutus Global Middle

8

École Cedar Hill Middle

6

École Central Middle

8

- Cordova Bay Elementary 8
- École Deep Cove Elementary
 - École Keating Elementary
- 75 Kelset Elementary

École Esquimalt Secondary

8

École Lansdowne Middle

8

École Oak Bay Secondary

8

- W Prospect Lake Elementary 76 Lochside Elementary

École Shoreline Community Middle

8

- 78 Sidney Elementary
- Claremont Secondary 69
 - École Bayside Middle Middle

Gordon Head Middle

Glanford Middle

Lambrick Park High

8

Monterey Middle

9

- 81 North Saanich Middle
 - 82 Parkland Secondary

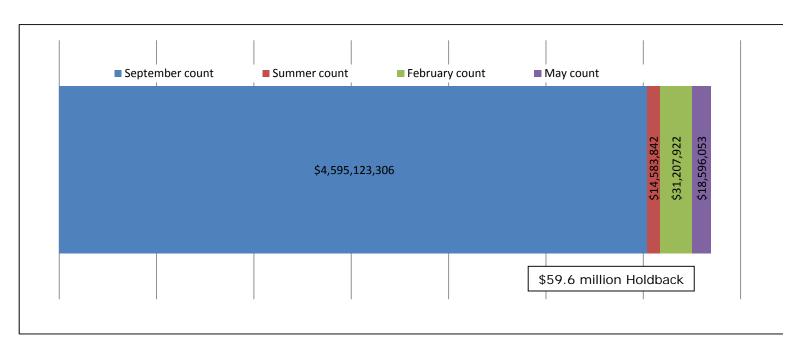
Mount Douglas Secondary

4

Reynolds Secondary

- 88 Royal Oak Middle
- Stelly's Secondary

Allocation of the total Operating Block and Enrolment counts (2013/14 estimated as at March 2013)



Funding Adjustments:

- Districts' preliminary allocations are adjusted after each of the enrolment counts; September 30th, February and May;
- District preliminary allocation will increase if actual enrolment is higher than district estimated enrolment; and consequently decline if actual enrolment is lower than district estimated enrolment;
- Funding Protection is calculated at the September enrolment count only this supplemental grant is calculated <u>last</u> and ensures that districts do not experience a funding decline of greater than 1.5% compared to the previous year <u>for the September</u> <u>count</u>;
- The "Holdback" is used as a contingency to fund districts for enrolment greater than the district estimated enrolment and preliminary allocation. Holdback not required for this purpose becomes available for allocation to all districts;
- The full operating block, including holdback, must be allocated to districts by June 30 of the current school year;
- Funding is disbursed in a "just in time" manner to closely match district cash needs.

Provincial Totals Basic Allocation Common per student amount for every FTE student enrolled by school type 79% allocated Standard School: **Continuing Education:** through the \$6,900 per school age FTE \$6,900 per school age FTE Basic **Alternate School: Distributed Learning:** Allocation \$6,900 per school age FTE \$5,851 per school age FTE Supplemental Funding Unique Student Additional per student funding to address uniqueness of district enrolment and support additional programming 12% Level 1 Special Needs: Level 2 Special Needs: Level 3 Special Needs: allocated to \$36,600 per student \$18,300 per student \$9,200 per student recognize unique student enrolment English/French **Aboriginal Education:** Adult Education: Language Learning: \$1,160 per student \$4,430 per FTE \$1,340 per student Vulnerable Students: in addition to CommunityLINK **Unique District** Additional funding to address uniqueness of district factors Small Low Rural Factor: **Climate Factor: Sparseness** Factor: Community: Enrolment: located some operate schools 8% for districts distance from in colder/ warmer for small operate schools with low Vancouver and climates schools that allocated to located a additional heating are spread total the nearest recognize distance away enrolment large regional or cooling over a wide unique from the next population requirements geographic district nearest school factors Student Location Factor: based on Supplemental Student Location: Level population density of school communities 1 and 2 special needs enrolment Salary Differential: Funding to districts that have higher average educator salaries Funding Protection / Enrolment Decline 1% allocated to buffer the Enrolment Decline: funding to Funding Protection: funding to districts experiencing enrolment ensure that no district experiences a effects of decline of at least 1% when compared decline in operating grants greater than declining 1.5% when compared to the previous to the previous year enrolment September CSF Supplement – district receives a 15% funding premium on allocated funding

All Funding information estimated for the 2013/14 School Year

Appendix "C"

Funding the CSF received pursuant to the Student Location Factor and amount budgeted for transportation services, by community, for the 2017/18 school year

Community		dent Location Factor Elementary Funding)	Student cation Factor Secondary Funding)	Total Student ocation Factor Funding	CSI	F Transportation budget	Difference between Student Location Funding amount and actual costs*
Campbell River	\$	113,850.00	\$ 44,850.00	\$ 158,700.00	\$	86,212.00	\$72,488.00
Chilliwack	\$	80,213.00	\$ -	\$ 80,213.00	\$	130,092.00	-\$49,879.00
Comox		248,400.00	\$ 86,034.00	\$ 334,434.00	\$	216,210.00	\$118,224.00
Coquitlam	\$	53,691.00	\$ 237,403.00	\$ 291,094.00	\$	728,026.00	-\$436,932.00
Delta	\$	67,275.00	\$ -	\$ 67,275.00	\$	121,480.00	-\$54,205.00
Kamloops	\$	103,500.00	\$ -	\$ 103,500.00	\$	146,354.00	-\$42,854.00
Kelowna	\$	194,063.00	\$ 65,766.00	\$ 259,829.00	\$	437,782.00	-\$177,953.00
Langley	\$	116,438.00	\$ -	\$ 116,438.00	\$	254,084.00	-\$137,646.00
Mission	\$	125,494.00	\$ 12,075.00	\$ 137,569.00	\$	258,145.00	-\$120,576.00
Revelstoke	\$	71,156.00	\$ -	\$ 71,156.00	\$	106,202.00	-\$35,046.00
Nanaimo	\$	148,781.00	\$ 82,584.00	\$ 231,365.00	\$	173,787.00	\$57,578.00
North Vancouver	\$	51,750.00	\$ 39,675.00	\$ 91,425.00	\$	395,359.00	-\$303,934.00
Port Alberni		36,225.00	\$ -	\$ 36,225.00	\$	84,848.00	-\$48,623.00
Penticton	\$	173,363.00	\$ 92,719.00	\$ 266,082.00	\$	243,212.00	\$22,870.00
Powell River	\$	137,138.00	\$ 51,966.00	\$ 189,104.00	\$	109,335.00	\$79,769.00
Prince George	\$	119,025.00	\$ 80,428.00	\$ 199,453.00	\$	213,817.00	-\$14,364.00
Richmond	\$	66,628.00	\$ -	\$ 66,628.00	\$	224,043.00	-\$157,415.00
Rossland	\$	80,213.00	\$ -	\$ 80,213.00	\$	-	\$80,213.00
Sechelt	\$	86,681.00	\$ 62,963.00	\$ 149,644.00	\$	75,000.00	\$74,644.00
Surrey	\$	20,234.00	\$ 173,039.00	\$ 193,273.00	\$	917,663.00	-\$724,390.00
Terrace	\$	49,163.00	\$ -	\$ 49,163.00	\$	28,600.00	\$20,563.00
Vancouver	\$	44,298.00	\$ 203,227.00	\$ 247,525.00	\$	1,609,226.00	-\$1,361,701.00
Victoria	\$	29,549.00	\$ 145,223.00	\$ 174,772.00	\$	649,972.00	-\$475,200.00
Howe Sound (Squamish, Whistler, Pemberton)	\$	525,262.00	\$ -	\$ 525,262.00	\$	186,062.00	\$339,200.00
Fernie	\$	28,463.00	\$ -	\$ 28,463.00	\$	8,429.00	\$20,034.00
Nelson	\$	93,150.00	\$ 18,975.00	\$ 112,125.00	\$	36,720.00	\$75,405.00
Reserve for growth/new school	\$	_	\$ -	\$ _	\$	138,252.00	-\$138,252.00
TOTAL				\$ 4,260,930.00	\$	7,578,912.00	-\$3,317,982.00

^{*}Deficits are represented in red.