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April 26, 2018

Independent Review Panel K-12 Sector Public Education Funding Model Review k12fundingreview@gov.bc.ca

Dear Panel Members,

On behalf of the Board of Education of School District No. 37 (Delta), please find attached our submission for the Ministry of Education's K-12 Funding Model Review. We are looking forward to the results of an improved model that supports Trustees in the commitment to excellence in education through adequate, stable and predictable funding.

The Board of Education appreciates the opportunity to contribute to this important project.

Sincerely,

Laura Dixon Chairperson, Delta Board of Education

cc: Association of Delta School Administrators CUPE Local 1091 Delta Parent Advisory Council Delta Teachers' Association Inclusive Learning Advisory Committee Indigenous Advisory Committee Reach Child and Youth Development Society All Boards of Education via BCSTA

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DELTA BOARD OF EDUCATION CONSIDERATIONS FOR FUNDING FORMULA REVIEW

Delta School District staff and the Board of Trustees are committed to a strong and continued focus on excellent educational opportunities. The Delta Board of Education appreciates this opportunity to offer comments for the participants in the funding formula review.

CURRENT BOARD DIRECTION AND COMMITMENTS

- » Enable all learners to succeed and contribute their full potential to the future
- » Engage students through stimulating, relevant and inspiring educational experiences that ignite a lifelong passion for learning
- » Prepare and empower students to contribute their personal best to society and become tomorrow's citizens and leaders
- » Nurture caring relationships, connections and a sense of belonging to our local and global communities

SUMMARY RECOMMENDATIONS

- » That both **Funding Model and Collective Agreement Language align** with a central and overarching Education Vision that considers both in conjunction with each other.
- » That the **primary objective be adequacy in funding.** The success of the Funding Model Review depends on all stakeholders moving in the same direction.
- » That the benefit of the funding formula review to some districts **not come at a cost to others.**
- » That where **changes are made to the new Funding Formula, that these be made in a stable and predictable manner and that they be phased in** over a longer period of time, in support with the BCSTA's guidance of "doing no harm".
- » That Boards of Education, parents, students and education partners be given an opportunity to consider and model the impact of the proposed new funding model and provide further feedback before the model goes into effect
- » That the implementation of the new Funding Model be delayed to afford all districts adequate time for consultation with their communities and education partners.



GUIDING PRINCIPLES

Overall, we believe the guiding principles **should do more than create clarity about how funds are allocated but should also establish a funding formula that has as its foundation a long-term vision for student success** within public education in British Columbia. The supporting vision should stand the test of time and serve to strengthen the co-governance relationship between future Boards of Education and Provincial Governments.

RESPONSIVE

Allocates available resources amongst Boards of Education in consideration of unique local and provincial operational requirements.

EQUITABLE

Facilitates access to comparable levels of educational services and opportunities for individual students across the province.

STABLE AND PREDICTABLE

Supports strategic, multi-year planning for educational programming and school district operations.

FLEXIBLE

Respects the autonomy of, and does not unnecessarily restrict, individual Boards of Education in the spending of their allocations to further student success.

TRANSPARENT

Calculates funding using a clear and transparent methodology.

ACCOUNTABLE

Allocates resources to Boards of Education in the most efficient manner and ensures that resources provided are being utilized as intended.

BOARD CONSIDERATIONS ON THE GUIDING PRINCIPLES

The guiding principles of stability and predictability should reflect the **joint-responsibility** of **Boards of Education and the Provincial Government in our co-governance** relationship.

Boards of Education are often faced with **increasing costs passed along by third parties**, **without a compensating increase in funding.** Consequently, we have no choice but to exercise our duty to be fiscally responsible on behalf of taxpayers which this has meant many cuts to important supports to students.

We have before us now the opportunity to capture the responsibility of future Provincial Governments for student success **to ensure that funding keeps pace with rising costs** such as increasing hydro rates, carbon taxes, inflation, unfunded wage and benefit increases and the like.

Trustees on the Delta Board of Education would like to see established in the definitions of these principles **that sustainable**, **predictable and fiscally responsible means that our students are protected from erosion of funding due to increased costs**.

Delta's Trustees firmly believe that **investment in education is a key driver to provincial economic success.** Now is the time to establish a vision that reaches past the mindset that education spending is an expense to taxpayers and instead, places the importance on investment in education as the driver of our future economic success.

Of course, there is a need to ensure accountability to taxpayers by both the Provincial Government and Boards of Education, **but we must be very candid** in our representations to the taxpayer **that accountability is more than a balanced budget.** We share the responsibility to ensure provision of the level of funding and the utilization of that funding is sufficient and appropriate to achieve student success.

Both levels of government should be accountable to show **that the funds invested are achieving** the levels of education, skills and training that ensure both individual and **collective economic success and well-being for our Province.**



THOUGHTS ON K-12 PUBLIC EDUCATION FUNDING IN BC DISCUSSION PAPER

THEME 1 STUDENT SUCCESS IN THE EVOLVING EDUCATION SYSTEM

"The current model does not directly incent improvements to student outcomes, and may not provide sufficient flexibility to enable individualized and flexible educational approaches to further student success." "The funding model does not include any direct link between funding and student outcomes"

(Quote from K-12 Public Education Funding in BC Funding Model Review Discussion Paper)

Recommendations

re: Student Success in the Evolving Education System

- » That the new Funding Model maintain a strong and continuing focus on funding for Learning, Mentorship and Collaboration for Educators and Support staff.
- » That the new Funding Model expressly consider the impact of the restored class size language with a view to restoring flexibility for personalized, competency driven learning model for students.
- » That funding for K-12 "bricks and mortar" students be based on Headcount.
- » That funding for Distributed Learning students be based on course registration.

ABOUT DELTA

Our District has a strong focus on Education excellence. **We constantly strive to provide opportunities for professional learning, mentoring and collaboration time within and among schools for our staff** and feel that maintaining those priorities has led to good progress in delivering more personalized and competency driven learning. This is a work in progress and we will continue to have to prioritize this work ahead of funding other areas.

However, we have not been able to implement a more **personalized**, **competency driven learning model for students** to any great extent as the Collective Agreement language on class size/composition makes this model financially prohibitive on a large scale. With the current Collective Agreement, more funding is required, and a change toward a more flexible model has become more difficult.

We believe funding should be based on head count for all students enrolled in K-12 day schools (v. based on course registration). When funding is based on registration in a personalized and inclusive learning environment, it is important that a full range of learning opportunities qualify for registration as all forms of learning have a support cost, whether by teaching staff, advisors, counsellors, specialists. Funding based on head count would provide greater flexibility on providing the best learning opportunities for each student, whatever their nature.

Between course registration and course completion by individual students, we strongly believe that course registration is preferable over course completion. Staffing is based upon enrolment and we do not have the flexibility to adjust staffing without incurring costs after the Collective Agreement lay off dates, nor would it be fair to subject students who do attend a course to have to suffer mid-term re-assignment due to attendance issues of other students.

Full Distributed Learning (DL) funding, should not require course completion. Costs are incurred regardless of whether a student completes a course or not and non-completion of a course can be due to multiple and varied factors.

FURTHER THOUGHTS ON PHASE 1 KEY QUESTIONS:

Should funding directly incent improvements to individual student success?

There is a deep concern about result based funding allocations. In an environment of inclusion, success takes many forms. What would the measure of success be that would drive success based funding? Would it incentivize systems that are more successful at the cost of those who might have a greater need for funding to get to success or would it provide funding to those who have not yet experienced greater success and withdraw it from those who have achieved it? **There needs to be flexibility by educators to assist students in the best manner possible and to assign resources where the greatest need is** without the thought on whether or not this will come with the needed amount of funding, whether this is therefore affordable and whether it can be proven in a reportable manner that the success that drives the funding can be achieved. Further, whether success will be achieved is not knowable at the outset, when the costs must be committed to.

Could the funding model better support changes in educational program delivery, including more flexibility, individualized learning, cross-curricular studies, and teacher collaboration, in ways that result in better outcomes for student? *and*

Can the funding model be modified to help close educational gaps and improve equity of access to educational programs and services?

Funding models to better support changes in educational program delivery and that help close educational gaps and improve equity need to be based on flexibility and on the possibility of providing creative solutions, on collaboration, co-teaching, on working in teams with smaller groups of students. All of these models require greater financial freedom.

THEME 2 EDUCATION FOR SPECIAL NEEDS, VULNERABLE & INDIGENOUS STUDENTS

"Inclusive education is the concept of integrating students with designated special needs, vulnerable students, and indigenous students into a regular classroom setting in a manner that supports their individual success." Initial stakeholder feedback has revealed that education funding approaches for special needs, vulnerable students in B.C. lags in three ways:

"The current funding directs a disproportionate amount of time and resources toward administration, assessments and paperwork, rather than direct services to students"

"There are vulnerable student populations which are not specifically included within the funding formula and the data being used to calculate existing allocations may not be comprehensive enough to capture the true landscape of vulnerable student populations in school districts; and"

"The rules around targeted funding for Indigenous students may be too restrictive and may not enable better outcomes for Indigenous students."

(Quote from K-12 Public Education Funding in BC Funding Model Review Discussion Paper)

Recommendations re: Vulnerable students, students with unique needs and indigenous students

- » That L1, L2 and L3 students be adequately funded, that is, based on the true service cost. This cost would first have to be established through research.
- » That there be funding for students with identified needs include all vulnerable students, whether or not they are identified as meeting current Ministry of Education special needs designation criteria.
- » That the Community Link Special Purpose Funding formula be re-assessed and that funds be distributed equitably, based on true community need and population size.
- » That assessment costs in smaller communities, whether rural or urban, be considered based on the true circumstances affecting individual communities.
- » That, if designation funding is to continue, funding for vulnerable students and those with unique needs be sufficiently ample as to allow for service provision during the time between identification of need and the occurrence of assessment required for the assignation of designations.

ABOUT DELTA

We do not have the funding to provide the full supports required by our students.

Children and youth present with more and increasingly complex mental health related needs, making urgent the need to focus on prevention and the provision of school-embedded mental health supports such as counselling services and child and youth care worker supports. Additionally, more students require access to learning environments deeply and broadly supportive of mental and physical well-being and promoting resilience beyond the classroom. These learning environments require ongoing adjustment to current structures and access to additional resources.

There are insufficient "spots" available via some of the Provincial Resource Programs (PRP's), for example, the Adolescent Day Treatment Program (ADTP) for children and youth experiencing extremely difficult circumstances. A robust continuum of mental health services including multidisciplinary assessment and intervention for children and youth experiencing the range of mental health difficulties (e.g., moderate mental health challenges to severe psychiatric difficulties) is critical to ensuring children, youth and their families have access to life-changing supports and services. To note is that access to current mental health related supports is insufficient to address evident critical need. As one example, the Adolescent Day Treatment Program (ADTP) has insufficient spots to address the needs of youth experiencing severe mental health issues. As a result, the Delta School District engages in ongoing prioritizing of students referred to ADTP– with the result that many youth requiring this service are not able to access it in a timely manner if at all. The outcome of insufficient access can be devastating for youth and families.

In Delta, the impact of these insufficient spots is compounded by limited community (within Delta) supports and services. This leaves a significant and concerning gap in available supports and services. (Example: We have students who are released but require intensive mental health care and are back in the community and in schools before they are ready, putting them at significant risk). It's not an exaggeration to state that these gaps have profoundly negative impacts on the lives of some children, youth and families.

Individual assessment, as a means of determining funding allocations, creates the need for "diagnosis" as an explanation for child and youth unique learning needs and behaviours. Designation connected to individual assessment and diagnosis as a means of determining funding allocations results in system-wide emphasis on assessment for identification and resource acquisition purposes (as opposed to greater emphasis on assessment to inform supports and approaches enabling student growth and success). The unintended outcome is an over emphasis on identifying child and youth differences and deficiencies. Schools and families pursue diagnosis as a means of acquiring resources. Within this context, students with Special Needs designations can be unintentionally perceived as "in addition to" the regular student population. As a result, some students and families experience an ongoing and sometimes difficult search for a diagnosis as an explanation for child and youth difficulties and differences. School teams and parents place emphasis on acquiring diagnoses as the means of acquiring resources.

AND YET – to do away with individual assessment as a means of acquiring funds comes with the risk of school districts receiving insufficient funds to address the unique needs of students presenting with learning challenges.

About students who require targeted interventions and or additional classroom supports for a period of time but who have not been assigned Ministry special needs Level 1, 2 and 3 designations. Students for whom a designation is imminent (but delayed as a result of assessment wait times) and students who present with significant challenges (and who do not meet Ministry designation criteria) continue to require interventions regardless of the absence of designation and associated supplemental funds.



Stretching further existing funds to provide critical interventions for this student population presents significant difficulties to the school district and unfortunately and unavoidably results in a delay to the implementation of at least some interventions. There is often a self-regulation, social-emotional learning (SEL) and/or mental health component for students over their K-12 school career and we are underserving the students who need more support to in their learning or wellness so they can achieve their full potential. Some of these issues, when left unaddressed, progress and then require more expensive interventions and create greater learning impacts because timely supports were unavailable.

In a designation driven funding process we find ourselves providing supports before an assessment is complete and before a designation is assigned and therefore before supplemental funding is assigned. Assessments can't be done sooner because of wait lists, a Provincial matter. Assessments must be made by a medical professional or, intellectual disabilities require psychologists to assess. The decision in the latter case can become one of deciding whether to get teachers or psychologists.

The range and degree of complexity in our population of students with Special Needs is not well served by the current "categorical supplemental funding structure". The categorical model does not provide sufficient resourcing for some of our most complex and intensive students with identified special needs. Within the current model, we are forced to "rob from Peter to pay Paul" in order to provide resources that are educationally sound for students with intensive and complex needs. A funding model that both considers needs profiles of students and funding to adequately provide appropriate specialist teacher and paraprofessional resources is required. We do not feel that the current model is equitable.

Delta's compliment of Community Partners is very small and often shared with the large city of Surrey. With community services in such demand, especially for youth experiencing an array of challenges, we struggle to access any local resources for our students. **Our Community LINK grant is very small and insufficient to fill any of these gaps.** This challenge is amplified in the area of Child and Youth Mental Health services. The current funding model does not provide the responsiveness required for school districts to address gaps in services for children and youth effectively.

The Targeted Indigenous Education funding formula does not provide sufficient funding to provide an appropriate level of services, in particular in meeting the requirement of the Truth & Reconciliation Commission and to meet graduation parity for our students of Indigenous ancestry in our District. We cannot achieve an equitable resourcing model for our students of Indigenous ancestry within the current funding model. A change to the funding model that could be made to improve Indigenous education outcomes would be to base the funding on total number of students in the District, rather than a targeted group. Targeting funding implies that funds are only required for support of students who identify as indigenous. In reality, our Boards of Education are tasked with indigenization of the entire curriculum, achieving equity and meeting the requirements of the Truth and Reconciliation Commission.

In order to improve education outcomes for Indigenous students, our Board is focusing additionally on **literacy targets and interventions for Indigenous students in the primary years.** This objective to make a "real difference" is in competition with other priorities for scarce dollars.

FURTHER THOUGHTS ON THEME 2 KEY QUESTIONS

Should an alternative, non-diagnosis (or reporting-base) model of funding students with special needs be considered?

Whether alternative, non-diagnosis (or reporting-based) models for funding students with special need should be considered, could depend on the ability of an alternate method to accurately capture the currently unmet needs of Indigenous students and those with special needs and vulnerabilities.

How can a new funding model reduce administrative costs and increase resources dedicated to services to student?

For such a new model to reduce administrative costs, assessments and reporting would have to decrease. To make this possible, a funding model would have to be found that would assign funding on alternate criteria.



THEME 3 responsiveness to local circumstances

"The funding model does not adjust sufficiently for enrolment dynamics between and within districts, differences in types, sizes and geography of schools or composition of students."

(Quote from K-12 Public Education Funding in BC Funding Model Review Discussion Paper)

Recommendations re: Responsiveness to Local Circumstances

- » That funding for unique student needs be expanded to consider the availability of service within the local community.
- » That transportation costs due to rising fuel prices be given consideration in the funding formula.
- » That a funding model be considered that takes into consideration differences between fixed, mixed and variable cost factors.

ABOUT DELTA

Delta is more rural than its size suggests – it consists of 4 small communities, not 1 bigger one - this means that many services that one might expect in a city, the size of Delta, are not present, which leaves the District in a position to have to fill the void with insufficient resources. *Please also see theme 2 on this topic.*

The student location factor funding falls increasingly short of the actual cost to transport Inclusive Education students (due to lack of recognition of student transportation related inflationary cost pressures such as fuel costs) and is insufficient to provide bussing for walk limit students, in particular in our rural/farm areas. This is so, even when including the Supplemental Student Transportation grant. We do not receive sufficient funding to provide bussing for walk limit students and have therefore had to cancel the bussing for them.

FURTHER THOUGHTS ON PHASE 3 KEY QUESTIONS

Should a combination of base and supplemental funding be utilized? If so what is the most appropriate balance of base funding compared to supplemental funding?

On including a combination of funding forms in the new funding model, the concept of fixed and variable costs could be re-considered. One of the concerns with funding, based on per pupil amounts, for all stakeholders is that changes in enrolment cause either too much funding having to be allocated or too little funding being received. When trends in enrolment change, so do the winners and losers of a largely per-pupil based formula. Separate recognition of fixed costs (e.g.: cost to open a small, medium or large school, regardless of enrolment, etc.) and variable costs (e.g.: the cost of guiding a certain number of enrolled students with varying needs to graduation and success, etc.) would potentially result in a more lasting model with less financial stress during times of change. Clearly oversimplified here, such a model would have to be thoroughly researched and based on a complex set of current factors applicable to today's public education environments and would have to operate in conjunction with the many other considerations and inputs resulting from the Funding Model review.



THEME 4 FLEXIBILITY

"Boards of Education have limited flexibility in budgeting, despite considerable local autonomy in the utilization of unrestricted operating funding. Special grants and targeted funding further restrict flexibility and there are no criteria for when they should be utilized."

(Quote from K-12 Public Education Funding in BC Funding Model Review Discussion Paper)

Recommendations

re: Flexibility

- » Overall, flexibility comes from adequate, sustained and predictable funding. A change in the elements of the funding model as a way to resolve inadequacies of the funding model in our view, is not a solution.
- » That throughout this review process, both Funding Model and Collective Agreement Language be considered together and in light of a central the overarching Education Vision.

ABOUT DELTA

Over the next five years, our main concern with the funding process is the **Collective Agreement language**, specifically language regarding class size and composition. The restored language and accompanying funding has created inequity amongst School Districts across the Province which needs to be corrected.

The impact of the shift from the **restored class size/composition language** to the next Collective Agreement is of great importance and the Board of Education wishes to stress that both **Funding Model and Collective Agreement Language need to align** with a central and overarching Education Vision that considers both in conjunction with each other.

FURTHER THOUGHTS ON PHASE 4 KEY QUESTIONS

Should the funding amount be calculated predominantly on headcount, course or credit-based, or another method?

Other special purpose funds that would provide increased flexibility to Boards, if un-targeted or incorporated into the Operating Fund, are Classroom Enhancement Fund, Ready Set Learn, Early Learning and Federal French Funds. The adequacy of each of these funding sources should also be evaluated before inclusion in the Operating Fund.

Which types of funding should be targeted and / or restricted to support equity of access to educational programs and services across the province and continuous improvement of student outcomes?

Not all special purpose funds should be un-targeted. Targeting, limits flexibility on one hand but also has the advantage, on the other, of ensuring a reliable funding source where there is a specific need. The Annual Facility Grant (AFG) is one such area.

Annual Facility Grant funding should not be integrated into the Operating Grant



THEME 5 FINANCIAL MANAGEMENT & ACCOUNTABILITY

"Strong financial governance and accountability support the education sector goals of enhancing student learning. Current governance structure for Boards leads to conservative approach to budgeting. This, combined with the timing of funding payments, contributes to increasing accumulated surpluses and cash balances." (Quote from K-12 Public Education Funding in BC Funding Model Review Discussion Paper)

Recommendations

re: Financial Management & Accountability

- » That reporting requirements be kept to a minimum in the interest of enabling maximum investment in education.
- » That the relevance in each reporting requirement be evaluated from time to time.

ABOUT DELTA

Fewer reporting requirements would enable a greater investment in direct benefits to students, on the education side but also the administration side where more in-district emphasis could be placed on aligning resources with direct in-district need.

Some reporting requirements could be updated to include more relevant information.

For example: age and state of buildings is more relevant to AFG funding than is number of students.

With Delta spending in excess of its Ministry provided Operating funding, reserves are not comprised of unspent Provincial funding.

FURTHER THOUGHTS ON PHASE 5 KEY QUESTIONS

Should the funding model account for school district own-sourced revenues, ensuring equity of educational opportunities for all students, regardless of where they live in the province?

Assumptions to consider in regard to this question might be:

- a) whether districts with own-sourced revenues have a sufficiency of funding from the Provincial Funding Model and are able to function when there are compensating funding reductions elsewhere and
- b) whether districts would continue to bring this revenue in if the beneficial impact of this funding were no longer available
- c) whether harm could come to districts with lesser provincial funding and greater reliance on this very volatile funding source.

Should there be a limit on the amount of accumulated operating surplus that can be carried over from year to year?

While the Board appreciates the concern of the Ministry of Finance and the B.C's Office of the Auditor General around accumulated surplus and cash balances, an **externally established limit on accumulated operating surplus amounts, would be of an arbitrary nature.**

Such a limit would not consider the specific circumstances and planning pertaining to these funds that is undertaken by Boards. In consideration of the guiding principles of stability, predictability and flexibility, it would be more helpful if accountability for accumulated reserves were to take the form of the already established Financial Health Working group initiatives, which revolve around reserve policy, strategic planning, internal reporting to audit committees, and external reporting in a manner that provides appropriate clarity on the general nature and the objectives of the carried funds.

Should school district spending be monitored throughout the year and allocations adjusted if a surplus is projected? For example, ensure that funding provided is being utilized as intended?

The circumstances leading to differences in spending at different times of the year can vary considerably and are not necessarily and indicator of year-end surplus funds. Board of Education are responsible for holding themselves accountable and the initiatives of the Financial Health Working Group further address this issue through budget management processes and the use of audit committees.

THEME 6 PREDICTABILITY AND COSTS

"A model based largely on student enrolment means that funding can be unpredictable. At the same time, certain types of costs are more fixed than others and can often differ widely amongst school districts. This can limit flexibility for Boards of Education when it comes to financial planning and budget management."

(Quote from K-12 Public Education Funding in BC Funding Model Review Discussion Paper)

Recommendations re: Predictability and costs

- » That the funding model fully, sustainably and adequately fund all education costs including costs resulting from increased complexity of education service provision and upcoming Collective Agreement negotiations, curriculum change and the impacts of our changing environment.
- » That the following costs, currently excluded from the funding model, be specifically considered: inflation, exempt salaries and any currently unfunded salary costs (e.g.: Co-operative gains CUPE funding), increases in benefit costs, increased costs for technology and equipment replacement admin savings reduction.
- » That supplemental funding for Unique Student needs be aligned with the true cost of complex service provision.
- » That funding confirmation be provided as early as possible, and that changes in funding be introduced with sufficient notice to allow for course alteration.

ABOUT DELTA

The issue is not with the current funding model per se, but with the surprise initiatives mid-year such as suspension of AFG, administrative savings plans, cooperative gains, etc.

While under scrutiny to reduce administrative costs, we are ranked amongst the top in the world for student achievement. Why place additional work on districts to report on various aspects of funding provided and add to the workload.

We are under pressure to retain and recruit exempt staff and teaching staff with the incredible high cost of living in our region. While there is a healthy level of new staffing to bring to a district, excessive turnover or loss of key personnel is very expensive from the standpoint of the employer who has an investment in each employee and this can create system disruption and can negatively impact student success.

AFG funding is insufficient to correct deferred maintenance issues and greater flexibility is needed between capital and operating component

With salary costs making up around 90% of the district budgets, the Supplement for Salary differential, is a key component in providing adequacy of funding for districts. It would be extremely helpful, if this funding model element were to cover all salary groups and related benefit costs.

Maintenance & Repairs - due to relatively stable enrolment we are not building new schools. Our **buildings are old and getting older**, the average age is 43 years. As such **the cost to maintain older buildings is more expensive.** The same is also true of some equipment in our schools.



THEME 7 geographic, economic and demographic factors

"The rural education review identified that the funding model may not fully recognize the unique needs of rural and remote school districts, or the additional costs to operate and maintain service levels in rural and remote schools."

(Quote from K-12 Public Education Funding in BC Funding Model Review Discussion Paper)

Recommendations re: Geographic, Economic and Demographic Factors

» That the unique geographic factors of districts be considered based on factors other than proximity to Vancouver alone.

ABOUT DELTA

Geographic Factors: Delta is a metro district with 4 distinct communities (N. Delta, Tsawwassen, Ladner and TFN) and 2 distinct geographical areas N. Delta (higher elevation farther away from the ocean) and Tsawwassen/Ladner/TFN (coastal at sea level). The difference in these two geographical areas creates sometimes very different **impacts with inclement weather. The climate factor should be based on more than just proximity to Vancouver. Elevation is an important aspect as well.** We have two distinct regions as far as impact of weather, as well we have four distinct communities separated by large tracks of farmland and/or bog.

Delta's topography is flat in some parts but other parts of Delta are situated on steep hillsides. The hillsides experience extreme winter weather resulting in considerable, safety and access related snow clearing costs, which are not captured in the geographic factors elements of the funding formula. There, our proximity to Vancouver, suggests that Delta is no significantly impacted by weather extremes.

DELTA SCHOOL DISTRICT

Laura Dixon, Chairperson (on behalf of the Delta Board of Education) Doug Sheppard, Superintendent Nicola Christ, Secretary Treasurer

THE BOARD WOULD LIKE TO ACKNOWLEDGE THE CONTRIBUTIONS OF OUR EDUCATION PARTNERS AND STAFF

Ashif Jiwa, President, Association of Delta School Administrators Patti Price, President, CUPE Local 1091 Joe Muego, Chair, Delta Parent Advisory Council Paul Steer, President, Delta Teachers' Association Inclusive Learning Advisory Committee Indigenous Advisory Committee