



## BCCASE Funding Model Review Submission – February 2018

### INTRODUCTION

The British Columbia Council of Administrators of Special Education (BC CASE) is pleased to offer this written submission to the Ministry of Education in response to the request for feedback on the Funding Model Review. BC CASE is a professional organization whose members are dedicated to improving the educational success for all learners; enhancing the worth, dignity, potential and uniqueness of each individual in society. Our submission aligns with our mandate and values and will be focused on supporting students with diverse needs (special needs) and vulnerable student populations.

Feedback was gathered through BC CASE regional representatives from the Island, Lower Mainland, Okanagan, the North, and the Kootenay areas and compiled by the BC CASE executive and regional representatives. BC CASE members are primarily the special education leaders in their districts. They have firsthand knowledge of the challenges inherent in providing effective services and supports to an ever increasing number of students with complex needs. They are also responsible for ensuring that practices, procedures and services for students with diverse needs in their districts, align with BC Ministry of Education policies and procedures, Human Rights Legislation, School District policies and procedures and also meet expectations of district stakeholders and parents.

#### ***What do BC CASE members appreciate about the current funding model?***

*Recognizes the need for specialized support for students with complex needs* over and above the funding provided in the block allocation to school districts.

- The supplemental funding for Levels 1, 2 and 3 is targeted
- Prioritizes services for students who are designated/meet criteria

#### *Supplemental funding is responsive to increases in identified students.*

- Level 1, 2, and 3 funding increases yearly if the number of ministry identified students in a district increases.
- February count allows for districts to provide services and supports for students with complex needs who move to a district after September 30<sup>th</sup>.

Standardization of supplemental funding framework provides a level of “equitable” access across districts.

- Clear identification procedures provide a framework for identifying students who meet the criteria for Levels 1, 2, and 3
- Provides a process by which the needs of the individual are assessed and an individual program is developed to meet these needs.

Provides opportunity for flexibility in how the funding allocated to districts is used.

- Can be used for resources, EA time, etc.

Encourages families to access provincial assessments, community supports which may provide additional information to support educational programming.

Community Link funding provides some additional support to vulnerable students.

**What do BCCASE members find challenging with the current funding model?**

Supplemental funding categorical system is rigid and doesn’t reflect the complexity of student needs.

- Restrictiveness of some of the ministry categories.
- Focused on category/label and does not capture the variability in the uniqueness of each child. Not needs focused.
- Districts are spending significantly more funding to support students in Levels 1, 2, and 3 than supplemental funding provides. Often these costs are related to “safety” issues. In some situations, 2 or 3 staff are required to support an individual student.

Lack of supplemental funding for high incidence populations and other vulnerable students.

- The requests and need to provide increased “supports” to students identified as categories K, R and Q are exponentially increasing with no supplemental funding to support the needs of these students.
- Students who demonstrate significant social/emotional issues who don’t meet ministry identification criteria, particularly those with anxiety, are requiring increased levels of support.

A focus on deficits rather than strengths – continuation of the medical model.

- District personnel are spending time identifying students rather than programming for them.
- Labels drive deficit thinking and dialogue is centered on what category the student will fit in rather than how to support the student to be successful.

Difficult to access timely assessments to identify students in appropriate categories.

- Challenges identifying some students' particularly young students who may not have assessments in place prior to starting school.
- Pressures schools to sometimes put unreasonable demands on families to get a "diagnosis" so the student can be designated and get more support. This has the potential to damage family/school relationships.
- Long wait times for assessment both within districts due to shortages in district and community specialists.
- Differing practice and diagnostic criteria between Education and other ministries. They are using DSM 5 criteria and the Ministry of Education requirements don't use DSM 5.

Difficulty accessing community services to support Ministry identification and subsequent 'wrap around' services for students in category H.

The audit focus on paperwork compliance doesn't enhance practice or processes in districts

Contextual Setting

BC CASE realizes that developing a funding model that sufficiently funds districts to address the issues identified above, meet the ever increasing complexity of student need, enhance a move toward more strength based inclusive pedagogy and address the current fiscal and political realities is extremely challenging.

In order to maintain some of the positive aspects of the current funding model and address some of the challenges inherent in a model focussed on labels, deficits and fitting students into categories, **BC CASE respectfully requests that the Ministry consider the following possible option for a new funding model.**

### **Maintain supplemental funding model – move to needs based framework**

Consider a “modernization” of the existing funding model to best align service delivery with the needs of students in all domains. ***Continue with supplemental funding for students with significantly diverse needs but move to a needs based supplemental funding structure where there are definitive criteria for identification based on demonstrated student need for support and intervention.***

This would allow the province to ***move away from supplemental funding based on a medical, diagnostically driven, categorical model, to a more inclusive model, based on demonstrated educational need and adaptive functioning within a provincially developed framework.*** It would move the discussion away from labels and categories to a focus on ***how the student can more effectively access learning environments, curriculum, appropriate social experiences and health supports. It would also provide a means to address the increasing demands and responsibilities placed on school districts for the provision of medical services, specialized equipment and maintenance, and specialized health assessments and maintain “targeted” funding to our most vulnerable students.*** While at the same time containing the number of students formally identified as requiring supplemental funding.

The already developed BC Ministry of Education Instructional Support Planning tools could be incorporated as a beginning as framework for this model, as well as other frameworks that have been developed in districts to allocate supplemental funding based on needs.

### **Recommended Considerations as the Ministry reviews the Current Funding Formula**

***BC CASE believes that moving to a “needs based funding” structure as outlined above would provide districts with funding that is more reflective of the current reality that districts are facing, as they diligently work to address the “actual” costs of meeting the educational needs of a very diverse population of students.*** We are concerned that although it may appear to be expedient to move to a non-categorical funding model, this could result in even greater challenges for districts.

BC CASE realizes however, that the Ministry may consider other options for funding districts to support students with special needs and other vulnerable populations. Therefore, in order to mitigate any unintended consequences that could occur due to a significant change in the

funding allocation structure to districts, BC CASE respectfully suggests that the following points be considered as the Ministry moves through this review process.

**Recommendation 1:**

**Ensure equity of access to effective educational programming for students with diverse needs and vulnerable learners.**

Give consideration to the following:

- Accommodating the variability between districts, as not all districts have the same incidence of disability due to their location, socio economic status, demographics, access to services, parental expectations, etc. Census data doesn't necessarily identify this and is often not current.
- As the incidence of disability continues to rise, consider how the "cost of increased need" (similar to a "cost of living" increase) will be built into the budget on which the allocations are based.
- Consider how a move away from a "targeted" supplemental funding model would improve student success so that the change doesn't result in fewer students being adequately supported. When students with high incidence disabilities were removed from targeted funding it became more difficult to identify their needs and program effectively for them.
- If the Ministry chooses to move to a "block" non-categorical funding allocation rather than continuing a supplemental funding model, thoughtful consideration should be given to the following
  - What will the allocation be based on – current numbers, projected numbers, census data, population distribution, disability prevalence rates?
  - How will districts that have a higher than "average" number of students with disabilities be accommodated?
  - How will students with complex needs who move into a district mid-year be provided educational support if there is no longer a February count based on the number of students who require supplemental funding?
  - How will the 2002 reinstated teacher contracts and the potential 2019 contracts align with a new funding model? Non categorical model for Ministry funding and a categorical model in contracts.

- How will changes in district demographics be accommodated e.g. a significant increase in the number of foster homes in an area? Increase in medical/therapeutic services in a region (so more families with children with challenges move to that area)?

**Recommendation 2: Ensure the new funding model is responsive to increases in students with diverse learning needs and the increasing complexity of these needs.**

The interpretation of “who is a student with special needs” has significantly grown during the past number of years and is now commonly referred to as students with diverse learning needs. Originally, disability was seen as severe and intensive, but now is seen as encompassing a much larger percentage of the population. This now often includes: students who struggle with academic expectations, are anxious about attending school, engage in non-compliant behavior and/or have social/emotional issues. This puts increased pressure on schools and districts to meet the needs of an increasing number of students with a variety of needs.

In addition, there continues to be an exponential increase in the need for mental health services and in school supports for students with significant emotional/social issues. The increase in students with mental health related issues has increased significantly over the past 10 years and the Canadian Mental Health Association now estimates that “about one in seven young people in BC—or 14%—will experience a mental illness at some point. Many mental illnesses—between 50% and about 70%—show up before the age of 18, so they can have a huge impact on a child’s development.” *Mental Illnesses in Children and Youth, cmha.bc.ca*

Therefore, it is recommended that consideration be given to the following:

- Addressing the increasing need for mental health services and in school supports for students with significant emotional/social issues.
- Consider how to support districts in funding the high cost of medical and therapeutic equipment e.g. lifts, standing frames, etc. With the loss of the specialized equipment grant in the 2016/17 school year many districts are struggling to provide the essential supports for students with complex needs.
- Addressing and supporting the needs of students who engage in intensely challenging behavior. Will this be accentuated by moving to a “non-categorical allocation” e.g. more students sent home, more students on reduced day programming?

- In BC many families are committed and passionate advocates for their children. How will a new funding model impact their advocacy in regard to expectations on districts to provide support for their children?
- Increasingly students with complex needs are in MCFD care and require significant attention, programming and coordination. How can these students be more effectively supported and funded?
- Many students with significant needs are arriving in kindergarten without assessment information or previous required intervention due to long waiting lists for assessment, therapy and support.
- Addressing the continuing need for specialists in districts to support the complexity of student needs – speech and language, OT/PT, school psychologists, counsellors, etc. (particularly in rural districts)

#### **Recommendation #3 - Review the current special needs audit process**

Although we believe there must be accountability for how Ministry money is spent, the current audit process focused on paperwork compliance, is shifting the conversation in school districts away from the educational needs of students, to conversations focused on what category a student fits into. These conversations reinforce the deficits and differences of students and don't support an inclusionary model based on student strengths and abilities. There is a significant amount of research that identifies effective practice to support inclusion of students with diverse abilities. Considering a "quality" audit based on effective practice indicators of inclusion could inform this new approach to auditing and maintain accountability, while at the same time providing districts with practical and research-based strategies and practices to enhance the education of all learners.

#### **Recommendation # 4 Addressing Systemic Provincial Issues**

Although funding to districts is the focus of this review, BC CASE believes that there are systemic issues that impact the education of all students in this province, particularly those with diverse needs and those who are vulnerable. With ministry attention and investment, in collaboration with BC CASE and other stakeholders, the life chances and success for all students could continue to be enhanced. Transitioning from a medical model focused on student deficits and diagnoses, to a truly inclusive model focused on strength-based classrooms where the needs and uniqueness of each individual are recognized and valued, teachers and support staff

need to have the knowledge, skills and strategies to effectively and joyously teach them. We therefore, as part of the funding review, encourage the ministry to consider the following:

### ***Knowledge and Training***

There is a provincial need to build classrooms which are increasingly resilient to inclusion, with more on the ground professional support for teachers, and an increased focus on collaboration and teamwork. It is very challenging to accommodate the diverse needs of students in our classrooms today and increased knowledge, training and support would significantly enhance the ability of our district staff, administrators, teachers, support staff and other professionals to effectively meet the complexity of needs.

- Provide a strong ministry investment in supporting teachers to teach the diverse student population that are in our schools today. Supporting existing teachers and support staff through In-service training, capacity building, mentorship, and professional development opportunities.
- Make course work in special education, teaching to diversity and inclusion mandatory for certification as a teacher in BC. Embed strategies to support diverse learners into every undergraduate course. Work with universities and colleges to implement this.
- Develop minimal qualifications for teachers to be in support/resource teacher/learning assistance roles including planning for and supporting students with complex needs.
- Implement “incentives” for teachers to get a diploma/masters in inclusive/special education (specialist teacher)
- Identify provincial standards for Educational Assistants and develop aligned training programs that include a specific focus on working with students with significantly complex needs.
- Develop provincial training for Principals and Vice Principals in how to lead an inclusive school.
- Develop mentoring/training for educators in District Principal/Director roles who are responsible for special education (Many of them don't have special education training)
- Increase in training for addressing the needs of students with behavioral challenges.
- Develop a strategy to attract and increase the number of Occupational Therapists, School Psychologists, Counsellors, Speech and Language Pathologists, etc. in the province particularly in rural areas.
- Revitalize and build on the BC CASE learning series and support districts to use these – focus on positive behavior

### ***New curriculum***

BC CASE members are supportive of the renewed BC curriculum which is conducive to supporting the differentiation of curriculum so that ALL students can successfully learn. The issue is that changing our pedagogical approach to teaching is very challenging.

- Embed strategies that support the range of learners within the renewed curriculum (focus on how to plan instruction for all students) inclusive planning tools. e.g. adaptations should be available for all students and embedded in effective instruction. The work that Shelley Moore, Leyton Schnellert and Faye Brownlie are doing needs to be expanded and become an embedded aspect of the renewed curriculum and accessible to more teachers.
- Build adaptation suggestions for all students into the new curriculum. Revise the 2006 Ministry document on Adaptation and Modification.
- Strengthen the focus on core competencies that support students to enhance their social/emotional skills – including a focus on teaching students to be self-regulated.
- A focus on collaboration and teamwork. Develop a ministry handbook supporting effective practice for teachers and EA's teaming together and provide increased funding that supports training and collaborative work between classroom teachers/support teachers/Educational Assistants.
- Consider ways that the Ministry can build on structures like POPFASD and POPARD to support educators to broaden the focus from students who have a label to the needs of diverse students.
- Bring districts together to share effective practices including a focus on positive behavioral intervention strategies.
- Have a central repository for effective practices and resources that are currently used in districts so they can be accessed on line. Work with other stakeholders to develop and coordinate this.

### ***Coordination with community agencies***

The needs of students attending our schools cannot be comprehensively addressed by our educational system alone and requires coordination, teamwork and support from a variety of ministries and community agencies. Although there is willingness to work together, in some situations, it is very challenging to access timely, coordinated and targeted community

assessment and support for our students. A continuing cross ministry focus on how to enhance our ability to work together and support communication and collaboration is recommended.

- Strengthen and increase assessment services and support to children prior to them entering kindergarten so that they can have a successful beginning to their school careers. Reduce waitlists.
- Continue to focus on supporting the transition between preschool/daycare/families and kindergarten so there can be a more seamless transition.
- As increased expectations are “down-loaded” to schools consider ways to support these expectations e.g. glucagon administration, mental health supports, children in care, naloxone, safe school strategies, etc.
- Explore ways that the Ministry of Education, school districts and MCFD can work together to create positions dedicated to information-sharing, coordination and advocacy in support of education outcomes of children and youth in care, both within school districts and between school districts and local MCFD and DAA services.
- Develop ways that information identifying students in care can be shared across ministries.
- Clarify the funding from MCFD for supporting OT/PT, SLP services in school districts as there is significant inconsistency in funding provided across the province.
- Consider recommendations made in the Child and Youth Mental Health in BC Report – Concrete Actions for Systemic Change which identified possible strategies to support better access in schools to mental health supports and intervention. Strengthen preventative programs.
- Provide support for Jordan’s principle. <https://www.canada.ca/en/health-canada/services/first-nations-inuit-health/jordans-principle.html> that is often brought up within the educational context.

## **CONCLUSION**

The British Columbia Council of Administrators of Special Education is committed to continuing to support and improve the success for all of our learners in BC. Ensuring the Funding Allocation System aligns with and supports our efforts in providing the most effective learning environments in which success for all learners can occur is essential.

We are grateful for the opportunity to have input into this process and look forward to continued dialogue and collaboration with the Ministry to collectively ensure success for all.