



April 18, 2018

Independent Review Panel  
K-12 Sector Public Education Funding  
Model Review  
Via email: [K-12FundingReview@gov.bc.ca](mailto:K-12FundingReview@gov.bc.ca)

Dear Panel Members:

I am writing on behalf of the Board of Education for School District No. 79 (Cowichan Valley) to provide feedback on the current funding formula and to make recommendations for change that would more effectively support the educational success of our students and School District operations.

The Board would like to emphasize that our focus is on student learning with programs and services that foster personalized, engaged and experiential learning through educational transformation for the educational success of every student in every school in our School District. We would also like to acknowledge the commitment to excellence and unique challenges of all 60 Boards of Education in the province; our desire is to have a funding formula that is “fair” to each School District. The Board needs to state that adequate funding is essential to providing excellent education for all students and to meeting the operating costs of each School District, no matter how the funding formula distribution’s design.

The Board has reviewed and reflected on the “Funding Model Review Discussion Paper” and offers specific feedback below. Members of our Education Partners have been consulted on this feedback: Cowichan District Teachers’ Association, Lake Cowichan Teachers’ Association, District Parent Advisory Council, Cowichan Valley Principals/Vice-Principals Association, Canadian Union of Public Employees Local 5101, United Steel Workers Local 1-1937.

### **Theme 1: Student Success in the Context of an Evolving Education System**

The Board recommends that funding be related to school vulnerability levels rather than student achievement results. It is recommended that additional funding be provided for high vulnerability schools to close the education gap in the early years.

## **Theme 2: Education for Special Needs, Vulnerable and Indigenous Students (Targeted Funding)**

### **1. Special Needs**

The Board certainly agrees with the statement in the discussion paper that the current funding directs a disproportionate amount of time and resources towards administration, assessments and paperwork, rather than direct services to students. We recommend moving away from the predominately medical diagnosis-based model for special education funding. Providing funding on incidence levels as population-based funding would allow the time and resources available to move from designations to program planning and support. A population-based funding model will also allow recognition and support for the students who are not in a designated/funded category for support. In addition, too much time is spent ensuring that the School District is “audit proof”; the time and resources could be redirected to servicing students. We need more time and resources to make sure students with special needs are successful in their educational programs and this cost neutral reallocation would assist us.

### **2. Vulnerable Students**

The Vulnerability Index criteria is clear and comprehensive. It is recommended that Community Link and Vulnerability funds be amalgamated into one grant as both have the same purpose and criteria. A total review of the amalgamated funding needs to occur to ensure appropriate distribution of the funds.

### **3. Indigenous Students**

Indigenous Student funding model creates the same problem for the Board as the funding for special needs students as there is too much time devoted to collecting data. For example, in September all Aboriginal Department staff are engaged for the whole month collecting data, not working with Aboriginal students or staff. The Board recommends that identification does not occur annually, rather that only new students are added to the database and that former students are deleted from the database of Aboriginal students in the School District. In addition, all Aboriginal students in the School District be registered on the District database as all Aboriginal students need support in their learning. The Board does not support a funding link between funding and educational achievement of Aboriginal students; the holistic education of each individual student is too complex.

## **Theme 3: Responsiveness to Local Circumstances**

Our Board understands and has experienced funding protection and enrolment growth differences in the current funding formula. While we have not experienced “economies of scale” to a significant degree, there are large and growing School Districts that do have the “economy of scale”. It is recommended that a review of the current model include this aspect. If a combination of base and supplemental funding is to continue, our Board supports any adjustment to a more balanced ratio between base funding and supplemental funding.

Transportation is a service that has gone through many changes in the last decade. The provision of transportation services is crucial in our School District to provide access to schools for students; as a result, it is recommended that transportation funding be included as part of the operating grant to support this necessary service.

The current funding on course-based enrolment seems to work well as it allows students to take more than a 1.0 FTE course load; if the funding moved to head count, it would be cost-effective to “cap” the allowed number of courses to 1.0 FTE. It is our recommendation that Distributed Learning students be funded at the same level as the regular school-aged base per pupil allocation.

The salary differentials of all employee groups should be recognized in the funding formula. Currently, the cost differential is provided for teachers only; BCPSEA has negotiated provincial benefit plans for support staff, which includes retirement allowances and created regional salary grids for exempt staff. Given that local Boards have minimal control over salaries and benefits costs, all cost differentials should be recognized in the new formula.

It is our recommendation that support for small and rural schools and School Districts needs to continue; when schools are geographically apart and have low enrolment, consolidation is not an option.

#### **Theme 4: Flexibility**

Our Board agrees that the funding model should be adjusted to provide Boards of Education with greater flexibility and autonomy in spending. A number of grants outside the block should be consolidated into the operating grant, especially the “one-time” grants; for example, would Boards have chosen to spend \$50 per FTE on supplies or provide other programs like Early Years if funding was available and flexible? Boards are responsible and committed to providing the best educational program for each and every student in every school and can determine how to accomplish that best at the local level.

#### **Theme 5: Financial Management and Accountability**

Strategic planning to meet goals is often a longer-term project than one year; as a result, our Board has surplus rollovers with items such as school resources for supplies, professional development monies for staff, equipment costs and capital projects. The Board recommends that this process continue to ensure thoughtful expenditures; perhaps when the amount of surplus reaches a certain threshold (3%), a District should have to report on their plan to spend the money. Our capital surplus takes many years to accumulate and time to determine use. Recently, we obtained permission to spend \$1.4 million of our restricted capital surplus to renovate a closed school to accommodate enrolment growth. The Ministry was unwilling to assist the Board with this expense. Without the capital surplus in a reserved account, we would have been unable to plan for the expected new enrollment. The accumulation of surplus funds often occurs to provide contingency funds for unforeseen events or enrolment fluctuations.

Funding was much more predictable when there was just the September enrolment count. Adding in February and May counts means that actual funding is not known until June, the last month of the school year. The Board recommends a new funding model that is more stable, predictable and long-term to support sustainable planning and budget management.

### **Theme 6: Predictability & Costs**

The Board supports less funding tied to enrolment to result in more stable funding and predictability for multi-year planning. The funding model should recognize differences in support staff wages and retirement benefits which is one of the largest cost items for a School District. Funding for wage increases should also be included for exempt staff and principals/vice-principals. Boards are challenged to fund non-unionized employees without funding when teachers receive a wage increase; equity of treatment of employee groups should be addressed. The restoration of class size and composition language also means that School Districts now have many different costs related to their Teacher Collective Agreements; these are not all recognized in the Classroom Enhancement Fund, which was intended to “cover all costs”. It is recommended that adequate funding is provided to cover increasing costs which are not within our mandate or authority to control.

### **Theme 7: Geographic, Economic and Demographic Factors**

Funding approaches for remote, rural, urban and metro should be different; large School Districts have significant economies of scale that do not exist in smaller, rural School Districts. There are often different costs of living and higher transportation costs in smaller, remote School Districts; in addition, students in urban centers often have public transit options that do not exist in smaller communities.

Thank you to the panel for considering our recommendations for the new funding formula.

Yours truly,



Candace Spilsbury,  
Chair, Board of Education

cc: Trustees  
Rod Allen, Superintendent  
Jason Sandquist, Secretary-Treasurer  
BCSTA