

March 27, 2019

Mr. Reg Bawa, Assistant Deputy Minister
Ms. Kim Horn, Executive Director, Funding and Financial Accountability
K-12 Sector Public Education Funding Model Review
k12fundingreview@gov.bc.ca

Dear Mr. Bawa & Ms. Horn,

On behalf of the Board of Education of School District No. 37 (Delta), please find attached our feedback on the Independent Panel's Funding Model Review recommendations. The Board of Education appreciates the opportunity to provide feedback on 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
All Boards of Education via BCSTA

DELTA BOARD OF EDUCATION

FEEDBACK ON INDEPENDENT PANEL'S FUNDING MODEL REVIEW RECOMMENDATIONS

MARCH 5, 2019

INTRODUCTION

In response to the report prepared by the Funding Model Review Independent Panel, called “**Improving Equity and Accountability**”, the Delta Board of Education is pleased to be able to provide the following submission on the Panel’s recommendations.

In preparation for this submission, the Board asked its education partners to participate in a collaborative input session. The session was attended by the Delta Board of Education, Delta senior staff, and 10 members from Delta’s education partner groups: The Delta Teachers Association (DTA), the Association of Delta School Administrators (ADSA), the Canadian Union of Public Employees Local 1091 (CUPE), and the Delta Parent Advisory Council (DPAC).

The participants focused on recommendations 1 through 11, “**Equity of Educational Opportunity**”, with the goal of providing constructive feedback. For the exercise, the education partners worked through each individual recommendation with facilitating staff versed in each recommendation topic, while trustees took note of the education partner’s input. The Board wishes to thank its education partners for their efforts.

The Board of Education is committed to a strong and continued focus on excellent educational opportunities. As was stressed at the various recent events on the funding model implementation, the Board would appreciate an early understanding of the actual formula in order to model its impact and provide input based on its findings. As well, the Board wishes to emphasize its position that the new model should use a “do no harm” approach to the re-allocation of funding.

Recommendation #1 - Allocate funding for specific needs first, and then allocate the remainder of funding based on a per-student amount.

- This recommendation ranks as most significant from the Board’s perspective. It is felt to set the tone for the remainder of the recommendations in the “Equity of Educational Opportunity” section. The emphasis on long-established formula areas of insufficient funding is appreciated.
- Encompassing recommendations 2, 4, 5 and 6, which are each complex in their own right, it however, raises additional questions and the Board finds that this makes it more difficult to comment and predict upon the implications from the recommendation.
- Specifically, the Board wonders whether with the remaining funding going to everything else besides the “specific needs”, there could be a risk that the “everything else” could potentially receive arbitrary or insufficient funding emphasis. For example, if funds are allocated for inclusion and for students with Indigenous ancestry first, is there the risk of having insufficient funds remaining for other necessary items, including those required by contract (e.g. class size).

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- We acknowledge the increasing flexibility made possible by this recommendation, but the Board also heard in the consultation that there is a need for district accountability. A discussion of the recommendations of accountability, however, lay outside of the scope of the collaborative session with Delta's education partners.

Recommendation #2 - Retain targeted funding for self-identified Indigenous learners and maintain a minimum level of spending.

- The Board agrees with the need for targeted funding for Indigenous learners, as it is concerned about the well-being and opportunities for this student population.
- What is not clear, is what the targeted amount should be. It is felt that current funding provides a maintenance level of supports and services only, and that given the objective of improving outcomes for Indigenous learners, these supports and services should be enhanced. It is felt that policy wording might be strengthened to assist here.
- There also is a concern that support might not reach those in need unless they are self-identifying.

Recommendation #3 - Work with the First Nations Education Steering Committee to support the continuous improvement of outcomes for Indigenous learners.

- The Board feels and heard strong consensus from its education partners, that there is a need for supporting the continuous improvement of outcomes for Indigenous learners and to determine what more can be done locally. FNEESC provides authenticity and an important lens through which to connect with this important topic.

Recommendation #4 - Create a single geographic funding supplement with two components:

Component 1 - 'Unique School District' characteristics should reflect some of the operational challenges of school districts

Component 2 - 'Unique School' component should recognize the operational challenges of some schools.

- The Board particularly wishes to emphasize its interest in the component of this recommendation that captures the issue of **the distance from communities containing schools to geographic centers containing basic services**. As an apt example, the Delta School District, while located among other metro Districts, consists of 4 small communities which do not have many of the supports and services available to larger communities, in particular, mental health services. Where these are essential in providing for student need, the Delta School District can only provide such services at its own cost. As an example of this, we are developing our own substance use and addiction support model, in part, because of the limited resources available in our community for youth and their families as related to substance use and addiction.

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- Similarly, a lack of public transportation within the 4 small communities makes attendance at school more challenging for students located in, or on the outskirts of, the 4 small communities. Here too, the Board feels a need to underline the importance of differentiating the small-community-effect within otherwise larger urban areas.
- Topography, not just geography matters. School Districts with topography ranging from mountainous terrain to flat land can be subject to much localized snowfall while in an otherwise gentler climate. In Delta, for example, the North End which is located on a hillside, receives significant amounts of snow, when frequently little snow will fall in the flatter South End. Often this can happen at just below zero temperatures, where the overall climate in the area would not suggest that there is a significant weather concern. Yet, mobilizing staff and resources to keep the North End accessible and ice-free can be a significant undertaking.
- Where weather statistics are used to determine funding formula elements there is a concern that they be kept current frequently enough to capture the fast pace of climate change.

Recommendation #5 - Replace all current supplements for enrolment decline and funding protection with a new, transitional mechanism that allows districts to manage the impact of enrolment decline over a three-year time period.

- Protection from unusual or unexpected funding decline is felt to be important and helpful by the Board.
- Significant transitions are often hard to deal with in a single year. The 3-year transition period would help with planning and adjustment to a new reality and would provide a buffer against sharp transitions.
- The suggestion that this would also be applied in the transition to the new funding model is greatly appreciated.

Recommendation #6 - The Ministry should create a single Inclusive Education Supplement. This single Inclusive Education Supplement should allocate funding through two components:

Component 1 – Students requiring high-cost supports continue to be reported and claimed for funding

Component 2 – Funds should be allocated through a prevalence-based model, using a comprehensive range of third-party medical and socio-economic population data.

- The Board acknowledges the well-intentioned spirit of the recommended single Inclusive Education Supplement.

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- We discussed that the move away from the current process of identifying students as meeting Ministry of Education special needs designation criteria required currently to access supplemental funds, would result in several positive outcomes. The positive outcomes include:
 - Staff having more time to attend to student educational needs
 - A decreased focus on students' diagnosis
 - A positive increased focus on student functioning in the classroom environment.
- We are interested in knowing more about the process that would be used for determining prevalence. The Board acknowledges that using a comprehensive range of third-party population data has the potential of accurately representing prevalence and is optimistic about the use of population data. Regardless, there is concern that demographic data may not represent changes in the numbers of students requiring supports that occur unplanned such as students moving unexpectedly into the district from other school districts.
- The Board wishes to express appreciation that the Inclusive Education Supplement would include funding for students requiring high cost supports. However, we see a need for more information about how the Ministry would identify these students. The Board feels that it was not possible to comment on the potential implications of this aspect of the Inclusive Education Supplement without more information.
- There was curiosity expressed during the consultation process about whether or not the move to a single Inclusive Education Supplement would have a negative impact on district accountability to provide services to students requiring specific supports. For example, would the move away from supplemental funds allocated to districts for the numbers of students identified in the categories of Level 1, 2 and 3, result in districts becoming less rigorous in their fulfillment of the current requirements for maintaining supplemental funds as outlined in the Ministry Special Education Policy Manual.
- Additionally, the Board heard that there is consensus among its education partners around the need to examine for equity reasons any current funding envelopes, like Community LINK, that would be 'rolled in' to the supplement. Specifically, the Board heard questions around how this would be calculated.

Recommendation #7 – regarding the Ministry working with the Conseil scolaire francophone to develop a unique school district factor for this province-wide school district.

- The Board did not give consideration to this recommendation.

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Recommendation #8 - The Ministry should eliminate the Classroom Enhancement Fund and allocate this funding as part of school district operating grants.

- The Board is wondering how, in the process of integrating CEF dollars into the Operating fund, one might equitably address the challenges arising from the existence of the many different collective agreements in BC school districts. In this regard, the Board agrees with the Independent Panel's recommendation which talks about the inequity of educational opportunities that these differences in collective agreements result in for students throughout BC. The Board shares the Independent Panel's view that 'in order to ensure equity of educational opportunity, CEF should not exist in its current form and this funding should be part of regular operating grants for school districts'. Using 2018-19 March CEF dollars per student as an example, there is a \$1,317 swing between the highest or \$1,707 per-pupil CEF amount and the lowest or \$390 per-pupil CEF amount in the 10 metro districts alone with Delta School District, at \$533 per-pupil CEF amount, falling somewhere near two thirds of the metro average of \$789 per-pupil CEF amount. The Board is wondering how one would accommodate these differences in a single formula that applies to all districts and serves all students equally well? We have not enough information to "make peace" with this issue and this leaves some unanswered questions.
- Generally, there is agreement that the current funding mechanism is not perfect and that a less complicated way to allocate these funds would be helpful.
- There is an appreciation for the flexibility to be gained from integrating the CEF dollars into the Operating fund. We feel that given the current parameters, translating the allocations into the best supports and services for students is difficult, and leaving this decision to be made at the school level would enable schools to best match actual student needs with the best support solutions.
- However, not everyone is in agreement with eliminating the CEF fund. The Board wishes to express its understanding for the concern that the potential loss of the CEF Special Purpose Fund, as a visible acknowledgement of the outcome of years of bargaining, would have to represent for teachers.

Recommendation #9 - The Ministry should base funding allocations for school-age educational programming on the number of students, instead of the number of courses.

- The Board strongly agrees with this recommendation. The thought was that per-course funding, as currently provided at the secondary school level, lends itself to requiring students to maximize their course load for funding purposes.
- The Delta School District is committed to providing supports and services and course options that best meet each individual student's needs, regardless of course load. There is a great appreciation for a recognition of the benefits that a per-student v. a per-course funding method enables and for the recognition that there is a cost to supporting students in a holistic manner, not merely academically, and that this holistic support will best enable students to graduate with dignity, purpose, passion and options.

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Recommendation #10 – With a shift to a per-student based funding model, the Ministry should develop a new policy and program delivery model for Distributed Learning to ensure consistent access to quality programming.

- The Board agrees with the need for a new policy in light of a potential shift to a per-student funding model. This policy would maintain per-course funding in Distributed Learning (DL) to ensure that students throughout the Province can continue to access the courses and the supports included with these courses. DL courses frequently add to a student's course load and DL course operation requires supports independent of those in the classroom.

Recommendation #11 - Funding for the graduated and non-graduated adults, continuing education, etc. should remain course-based.

- Course-based funding most naturally aligns with the partial course load typically taken by non-graduated adult students. The Board agrees with the Independent Panel's recommendation that this should remain so. It was, however, felt worth noting that vulnerable non-graduated adult students, whether adults who are ELL, adults with refugee experiences or adults completing their graduation, need supports beyond academics, just as other students do. As funding is strengthened in this regard for K-12 students, these considerations should be contemplated here too.
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In Closing:

- The Board appreciates the opportunities that have been made available to provide input into the funding formula evaluation process. We continue to emphasize the importance of having a chance to model and provide comments on the final formula before it is put into effect. The formula to be evaluated should include the impact of the next set of BCTF and CUPE collective agreements. We believe that there is a chance for local context to be missed if we overlook the opportunity for the Ministry to consider feedback of the actual impact on districts of the next funding formula. We thank you for a positive March 15 funding announcement, and look forward to continue working closely together on the important work of improving education outcomes for students in BC.