



# SD43 (Coquitlam) Review

## of the Report of the Funding Model Review Panel 2018

with comment on the 22 recommendations

February 19, 2019

# Introduction

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This report provides background information and details on the extensive reviews that have occurred, action taken by School District No. 43 (Coquitlam) (SD43), and feedback to the Board in evaluating the impact the proposed funding model review may have on students, staff and communities within SD43.

In September 2017 the provincial government announced a sustainability review undertaking across several ministries including the Ministry of Education. This initial review was technical in nature and collected information from school districts. The purpose of this review was structured to ensure that the K to 12 public education system receive stable and predictable funding.

In October 2017, the Ministry of Education announced the launch of a funding model review to ensure BC's K-12 public education system receives stable and predictable funding. The new funding model was anticipated to be in place for the 2019/20 school year.

The review is intended to take place in five phases as follows:

- Phase 1: Establish principles and scope, Fall 2017
- Phase 2: Gathering foundational information, Fall/Winter 2017
- Phase 3: Review team analysis, Winter 2017/Spring 2018
- Phase 4: Complete a new model, Summer/Fall 2018
- Phase 5: Implementation and evaluation, Fall 2018 to Fall 2019

All school districts have had the opportunity to provide their input into these guiding principles. SD43 provided several recommendations and met with the review panel.

The Ministry of Education has subsequently released the Panel Findings including 22 recommendations. Given the extensive nature of these recommendations, the Minister of Education has determined to further consult with the K-12 sector and to delay implementation until the 2020/2021 school year.

This report is intended to provide feedback to the SD43 Board, to inform them of SD43 staff's observations of the 22 recommendations and secure Board direction in a response during the next consultation process.

# Executive Summary

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The current K-12 education funding model has been in place since 2002 and is primarily based upon a per pupil funding allocation system. While funding to school districts is based upon this allocation model, and contrary to wide-spread inaccurate information, funding does not follow the student. That is, school districts have the discretion and flexibility to allocate the provided funds in any manner they choose – except for target funding or specific purpose funds. There is only one targeted funding allocation today – for aboriginal education requirements.

The intent of funding allocation factors is to bring ‘equity’ to all students. A comparison of the current funding model and the previous pre-2002 funding model is captured in the chart below. We are unsure of the factors that will be in place for the 2020/21 school year.

**“Equity” Factors Then and Now**

<b>2001/02 Funding Allocation System</b>	<b>2018 Current Funding Allocation System</b>
<ul style="list-style-type: none"> <li>• Base funding per district and school</li> <li>• Class size, Teachers and cost</li> <li>• Counselling, Library, Career</li> <li>• Special Needs</li> <li>• Administration and Governance</li> <li>• Facilities Space</li> <li>• Transportation KM</li> <li>• Geographic Factor</li> </ul>	<ul style="list-style-type: none"> <li>• Funding Protection and Enrolment Decline</li> <li>• Common Per Pupil</li> <li>• Salary adjustment-teachers</li> <li>• Unique Student needs</li> <li>• Geographic and Transportation</li> </ul>

The Ministry of Education announced a review and consultation process of the funding model in late 2017 and interested parties were invited to meet and provide feedback. One of the parameters of the review was the stipulation that no new funds would be injected into the education system. This led to the perspective that any changes to the existing model or any adoption of a new model would have a consequence of reallocating existing funds – most probably from larger, more urban, school districts to smaller, more rural, school districts.

SD43’s approach to the funding model review contained eight recommendations focused on refining the existing per pupil funding model through an improved recognition of incurred costs brought on by the shifting of services onto school districts, by recognizing the growth of unfunded costs i.e. inflation, and enhancing and/or simplifying funding formulas to not only reduce administrative burden, but to ensure the provided funds can be appropriately directed to the needs of students.

The Review Panel released their findings in December 2018. Given that the 22 recommendations exceed the original scope and that the recommendations have potentially far great implications than originally foreseen, the Ministry of Education has delayed the implementation by one year - to the 2020/21 school year. The Ministry has undertaken further consultation over the next few months to ascertain the importance of each of the recommendations, those that best support

student achievement, and those that are most challenging to implement. The 22 Recommendations were categorized into three themes;

Theme 1: Equity of Educational Opportunity – Recommendations 1 to 11

*“...allocate funding in order to support improved student outcomes by providing equity of educational opportunities to every student in BC.”*

Theme 2: Accountability – Recommendations 12 to 17

*“A sound accountability framework is a critical part of the funding allocation model. Improving student outcomes and educational transformation requires accountability for the use of funding.”*

Theme 3: Financial Management – Recommendations 18 to 22.

*“Understanding cost pressures, sound planning and ensuring that resources are used to support student outcomes underpin the education funding system.”*

The importance of understanding the quantum impact of the 22 recommendations is critical to determining the funding impact on the School District. It could be that the funding quantum does not change in the short term, but the implications for future years could be clouded without further analysis. It is not clear if the Ministry will adopt all 22 recommendations or if the modelling of the impact of adopted recommendations will be shared for a subsequent round of consultation. As a result, each recommendation must be reviewed and analyzed in isolation of the other recommendations.

The four recommendations that have been raised by staff and our partner groups related to the perceived negative impact on funding and the implications to student achievement are;

- **Recommendation #1 – Fund Specific Needs first and then allocate the remainder of funding based on a per student amount.**
  - To operate a school district and provide education services as required by the *School Act* requires a base budget provision, which this recommendation would move away from.
  - Not providing base funding removes a high degree of stability from school districts.
  - This approach to funding appears to be upside down as the base per student funding grant ends up being what is left over and creates far greater funding uncertainty.
  
- **Recommendation #6 – Component 2 indicates a move to a prevalence-based model of funding for students with special needs.**
  - This recommendation will undermine a fundamental dimension of providing equitable educational services to students with unique needs. That is, the provision of differentiated resources to schools and students, according to the learning needs of each student.

- An unintended consequence of this recommendation will be to unduly penalize school districts which have purposefully and systematically improved their services to students with unique needs. This is because of the natural tendency for parents and guardians to seek out schools and school districts that provide exceptionally good services to students.
  - There is a broad-based view that some school districts are better at assessing students than a prevalence-based approach provides.
  - In isolation this recommendation potentially under funds our most vulnerable children and undercuts educational equity.
  - Given past Ministry practice related to CommunityLINK prevalence-based funding, SD43 has been underfunded for many years despite provided data to the contrary.
- **Recommendation #9 – Move funding based on the number of students and phasing out the course by course funding model.**
    - This recommendation will undermine the Future Focus dimension of the BC Ministry of Education’s Policy for Student Success because it will limit the development and availability of unique, creative and innovative course offerings. Similarly, it will limit the ability of school districts to achieve the stated Ministry objective of developing the “Educated Citizen” (Royal Commission on BC Education 1988 – the Sullivan Report). The recommendation represents a flip-flop in Ministry funding policy. This uncertainty and inconsistency are not supportive of the systemic change required by the re-designed competency-based curriculum, prescribed by the province.
    - Loss of flexibility for students to change career path options for both post-secondary and trades by limiting to 8 blocks. This has the potential to reduce student’s success and grad rates by decreasing course opportunities
    - May impact support for vulnerable students and special needs with reduced flexibility to support course failure.
    - Limits personalization as promoted by revised curriculum and potentially erodes student engagement reducing choice limiting broad based liberal arts education.
  - **Recommendation #10 – Changes to the Distributed Learning model.**
    - We are concerned about changes to the DL delivery systems without first understanding its impact. We believe that a robust DL funding model review should include how this can become the primary educational delivery model in significantly less populated areas of the province
    - While a Provincial (or regional) model may be the replacement outcome, a concern is the loss of face to face student: teacher time. There is measurable evidence that student success improves from a range of 50 to 60% to 90%+ with this contact.
    - Our concern around the emotional and physical wellbeing of students and students disengaging escalates without the occasional ‘check in’.
    - There is the potential loss of personalizing, enrichment and reduced options to support vulnerable learners and appears at odds with the new curriculum.

We strongly support Recommendation #8 – absorbing the MOA#17 funding into the normal school operating grant funding regime while remaining concerned as to how equity will be transferred and retained, given the complexity of unique school district collective agreement language.

We also strongly support Recommendation #5 – reducing the timeframe around enrolment decline and funding protection funding supplements. We would have liked to have seen the timeline reduced even further if recommendation pertaining to multi-year financial plans are in place. Other education equity recommendations do not evoke a strong opinion.

Recommendations #12 to 17 made under the umbrella of ‘accountability’ will require the Ministry of Education to be more actively engage with School Districts. While we do not take issue with these elements, we think this should be exception based such that school districts that are meeting or exceeding performance criteria should have minimal intervention.

Recommendation #16 and #17 which speaks to Ministry support to develop leadership, management capacity and workforce planning, are important elements and Ministry support in the form of funding will be a necessity.

Recommendations #18 to 22 are made under the umbrella of financial management and require Ministry action. We support all these recommendations but caution about being too prescriptive with recommendation # 20 as to the establishment of reserves and usage.

Over the course of the next few months, the Ministry will establish several working groups to solicit feedback and comments from school districts prior to the planned implementation for the 2020/21 school year. To ensure that we are unified and clear in our response, SD43 has prepared this in-depth review of the 22 funding model review recommendations for Trustee consideration.

## Background – Education System Funding History

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The K to 12 funding system first came into play in the 1983/84 timeframe. Block funding was introduced in 1990 in response to the 1988 Royal Commission established to review education funding. It was recommended to determine the amount of provincial funding needed for educational services and included an education price index. These early years of block funding follow the principles of the Royal Commission.

In 1992, an educational funding review panel made several recommendations including, linking block funding to a resource costing model based on defined services, required resources, and actual costs.

In 1994/95 the funding allocation system was introduced, and the following school year three main areas of funding were identified:

- General operating including core grants;
- Targeted grants for special-education aboriginal education learning resources and a maximum that could be spent on administration; and
- Developmental grants for staff training program implementation and support.

In March 2002, a new funding formula was announced, 82% of funds were for student allocation, creating five broad supplementary grants and leaving aboriginal education as targeted funding:

- Unique student needs;
- Enrollment decline;
- Salary differential;
- Transportation and housing; and
- Unique geographical factors.

Modifications were made to this model over the years;

- Funding protection was introduced in 2005/06;
- Summer learning funded in 2008/09;
- Transportation funding moved into the geographical supplement in 2012/13;
- February/May enrolment counts introduced in 2006/07; and
- Distributed learning moved to the block in 2006/07.

In 2011 major changes included;

- Labour settlement funding was incorporated into the per pupil amount;
- The salary differential formula was revised;
- Course challenge funding was introduced;
- Full Day Kindergarten was introduced and funded; and
- The Learning Improvement fund was introduced.

This focus on per pupil allocations remains in place today. There has not been an in-depth review of the overall funding system since 1992, albeit major funding allocation revisions were made in 2002.

## SD43 – Submission to the Funding Model Review Panel

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A key element of the funding model review is that no new funding is intended to be injected into the educational system. This is concerning as it leads to school districts competing to increase funding, at the expense of another.

Based upon technical completed in the fall of 2017, a funding model review discussion paper was released in March 2018. (Please see the full report [here](#).)

SD43 made eight recommendations. All recommendations are about funding for actual costs specific to each school district. This means funding for actual staffing costs, benefit costs and program delivery costs (i.e. special needs and targeted funded programs) prescribed by the Ministry of Education.

The Minister established an independent panel charged with soliciting feedback from all K to 12 school districts. SD 43 made such a submission and highlighted eight key points as follows (Please see the full report [here](#)):

1. *Funding should match the cost of operating a school district which includes the cost of delivering educational programs, related overhead costs, and infrastructure.*
2. *Funding should be increased annually to cover the cost of inflation.*
3. *We respectively recommend modifying and discontinuing the Funding Protection and Enrolment Decline funding grants and instead distribute these funds to all school districts through the per student grant base amount.*
4. *The Supplement for the Education Plan targeted funding should be eliminated and rolled into the basis student grant formula.*
5. *We recommend that standards of appropriate support levels be established for students with special needs, and that this standard be made transparent and fully funded.*
6. *Targeted funding, and in particular the funding formula for Vulnerable Students needs to be made transparent, updated and changed as demands changes between school districts and over time.*
7. *We recommend increasing funding to support students with mental health related challenges and providing a model that will work with the three Ministries of Children and Family Development, Health, and Mental Health and Addictions to provide wrap-around support for students.*
8. *We recommend that significant Capital funding be provided expeditiously to add more classroom space to our schools, to make schools safer for students, to allow for better maintenance of existing facilities. This would ensure that funds provided through the Funding Formula are used for Educational needs and not redirected for Capital needs. We also recommend that the project approval process be streamlined. The ultimate goal is for every student to receive an education in safe, modern classrooms and schools.*

In April 2018, the Superintendent, Secretary-Treasurer and Board Chair met with the panel and further discussed these and other issues pertaining to the existing funding model. The focus was on retaining the existing model and to provide additional funding support. A redistribution of funds from larger school districts to smaller school districts was raised as a significant concern if no new funds were introduced into the K-12 education system.

In May 2018 the Independent Review Panel released the paper “*Report out on What We Heard From School Districts*”. (Please see the full report [here](#)).



## Seeking Equity

The intent of funding model allocation factors is to bring ‘equity’ to all students. A comparison of how the model has changed over the years can be captured in the two charts below.

Over the years, the core, per pupil, funding allocation (as a percentage of allocated education dollars) has slowly declined as unique factors such as geographic, individual student needs, and transportation factors have been introduced or enhanced. One significant change has been the elimination of fixed district school funding allocations, (i.e. small school consideration) of which certain aspects are recommended as being re-introduced back into the model. If this is a consideration, then unique characteristics of middle schools’ operations should also be an inclusionary factor.

### Fiscal Framework to Now – Equity Factors

<b>Equity Differences</b>	<b>1996/97</b>	<b>2001/02</b>	<b>2018/19</b>
Fixed-District, School and Square Meters	17.77%	19.07%	0.00%
Geographic	3.66%	5.76%	5.51%
Unique Standards	9.02%	13.10%	12.97%
Teacher Salary	2.04%	2.26%	1.95%
Funding Protection and Enrolment Decline	0.00%	0.00%	0.35%
Per Pupil	67.50%	59.81%	79.22%
	100.00%	100.00%	100.00%

	<b>2001/02</b>	<b>Percentage of Funding</b>	<b>2017/18</b>	<b>Percentage of Funding</b>
Core	\$3,078,668,158	81.22%	\$3,924,800,116	77.88%
Enrolment Decline	13,892,718	0.37%	723,223	0.01%
Unique	368,324,488	9.72%	670,783,964	13.31%
Salary	85,487,032	2.26%	97,723,396	1.94%
Geographic	132,807,000	3.50%	170,567,006	3.38%
Transportation	85,705,613	2.26%	104,721,624	2.08%
Formula Buffer	25,514,845	0.67%	13,944,753	0.28%
Other – continuing ed, refugee, summer school	0	0.00%	56,184,097	1.11%
Total Block Funding		100.00%		100.00%

We are unsure of the factors that will be in place for the 2020/21 school year.

## Current Status and Next Steps

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The Review Panel released their findings in December 2018. (Please see the full report [here](#).) Given that the 22 recommendations exceed the original scope and that the recommendations have potentially far greater implications than originally foreseen, the Ministry of Education has delayed the implementation by one year - to the 2020/21 school year. This will enable the Ministry of Education to undertake further consultation on the importance of the recommendations, those that best support student achievement, and those that are most challenging to implement.

On January 22, 2019, the Minister of Education established four working groups:

- Inclusive Education
- Online Learning
- Adult and Continuing Education
- Financial Management

Further, a committee will be established outside these four working groups (Accountability Advisory Committee) to guide the implementation of an accountability framework aligned with the recommendations. This committee is intended to ensure strategic plans are in place and measurable and focused on student outcomes.

Metro Secretary-Treasurers engaged with Ministry staff on February 1, 2019, to improve the understanding of the next phase of consultation. It has been indicated that there will be approximately six months to explore, better understand, and potentially refine the recommendations and determine operational issues related to the recommendations.

Partner groups/associations met on February 15, 2019 to discuss the process of consultation and to appoint individuals to these four committees.

Secretary-Treasurer's will meet with Ministry staff on February 21, 2019 to further the discussion around the implementation of the next consultation stage, the committee structure and how to secure feedback from interested parties. A key component of this next stage is a discussion on the current model – which is not widely understood – versus the recommendations and transparency of the modeling on each of the equity funding recommendations. It has been advised that feedback to government needs to be completed in the Fall of 2019 for inclusion into the February 2020 Provincial budget and 2020/21 school district funding announcement in March 2020.

There are three possible outcomes to the funding model review:

- a) Stay with the current model (perhaps with minor changes associated with accountability and financial management)
- b) Incorporate some of the funding recommendations – tweaking around the edges; or
- c) Move wholesale to a new model.

If there is to be a wholesale change, the impact and process of transition will need to be made transparent and completely understood. Currently, it is not clear that the next six month's consultation process provides for this element.

## Commentary on the 22 Recommendations

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The cost basis of the existing and to be proposed new model to deliver educational services is not known. Further there is no accountability on Government to provide the required funding necessary for educational operations. The funding model recommendations appear to be more about accountability than changes - without addressing the true cost of an educational system. We do know that as a portion of the provincial budget, education has moved from 20% to 14%, due to the proportion of the budget devoted to health services. Yet, school districts are asked to expand their mandate and do more, with no incremental funding provided.

SD43 have made comments to each of the 22 recommendations which are detailed below. The difficulty in determining the impact of these recommendations – primarily recommendations #1 to #11, is a need to understand the quantum before one can make a reasonable determination as to the financial impact on the school district. It is also not clear, if all recommendations will be implemented or the timing of the implementation. Even though implementation is planned for the 2020/21 school year, it does not necessarily translate that all recommendations would be implemented in this first year but could be staggered over several years. As a result, each recommendation has been reviewed on the basis of a stand-alone provision. With no incremental funding added into the system, it does result in a funding reallocation model.

Our response to the initial review panel was about incremental change to the funding model – a refinement approach. We continue to believe the existing funding model is at its core – sound and should be retained. Nonetheless, to be prudent we provide comment on the recommendations.

Staff have rated each of the 22 recommendations as follows;

- |  |          |
|--|----------|
| 1. <b>Red</b> - Significant concerns around the impact on students | 4 noted  |
| 2. <b>Yellow</b> - Caution - will require some additional clarity  | 3 noted  |
| 3. <b>Green</b> - Would support, but may need some further clarity | 15 noted |

#		<u>Description</u>	<u>Staff Comment</u>
1		<p><i>The Ministry should allocate funding for specific needs first, and then allocate the remainder of funding based on a per-student amount. The panel has identified the following specific needs that should be funded first:</i></p> <ul style="list-style-type: none"> <li>• <i>Targeted funding for indigenous students;</i></li> <li>• <i>Unique school district characteristics as defined in Recommendations 4 and 5; and</i></li> <li>• <i>Inclusive education as defined in Recommendation 6</i></li> </ul>	<ul style="list-style-type: none"> <li>• We are neutral to negative on this recommendation – as we agree with the targeted funding for indigenous students as identified in recommendation #2 but we are quite concerned about elements of recommendation #6.</li> <li>• To operate a school district and provide education services as required by the <i>School Act</i> requires a base budget provision, which this recommendation would move away from.</li> <li>• Not providing base funding removes a high degree of stability from school districts.</li> <li>• This approach to funding appears to be upside down, as the base per student funding grant ends up being what is left over and creates far greater funding uncertainty.</li> </ul>
2		<p><i>The Ministry should retain targeted funding for self-identified Indigenous learners and maintain a minimum level of spending.</i></p>	<ul style="list-style-type: none"> <li>• We support this recommendation</li> </ul>
3		<p><i>The Ministry should work with the First Nations Education Steering Committee to support the continuous improvement of outcomes for Indigenous learners, particularly determining whether changes are needed to the policies that govern the use of the Indigenous student targeted funding envelope.</i></p>	<ul style="list-style-type: none"> <li>• We support this recommendation</li> </ul>
4		<p><i>The Ministry should consolidate and simplify existing geographic funding supplements, the Supplement for Salary Differential and relevant special grants outside the block into a single supplement, with two components:</i></p> <p><i>COMPONENT 1 - 'Unique School District' characteristics should reflect some of the operational challenges of school districts compared to the norm by considering:</i></p> <ul style="list-style-type: none"> <li>• <i>The enrolment of a school district compared to the provincial median school district enrolment;</i></li> <li>• <i>The distance from communities containing schools to geographic centres containing basic services;</i></li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• While we do not have concerns with simplifying geographical funding supplements, we believe there are significant disproportional costs related to salary and benefits that need to be addressed.</li> <li>• We do agree that the salary differential funding model should be expanded to include all school district employees.</li> <li>• A gap in unique characteristics is that it does not mention/consider some of the challenges around attraction and retention of specialty jobs due to non-education competition, a staffing shortage, and compensation disparity.</li> <li>• If there is to be a re-introduction of small school or density driving funding, then middle schools should also become an inclusion factor. This model has proven to be a positive contributory factor to student success in the form of improved graduation rates.</li> </ul>

4	<ul style="list-style-type: none"> <li>• <i>The climate of a school district, characterized by the cost of providing heating and cooling for schools; and the fuel utilized, and the amount and duration of snowfall in a school district;</i></li> <li>• <i>The distribution of students and schools across a school district, as characterized by:</i></li> <li>• <i>The density of the student population in a school district, compared to the highest density school district in the province;</i></li> <li>• <i>The average distance from each school to the school board office, including the effect of geographic features; and</i></li> </ul> <p><i>A modification of the current salary differential funding approach to be based on total compensation and expanded to include all school district employees.</i></p> <p><i>COMPONENT 2 - 'Unique School' characteristics, not addressed in the first component, should recognize the operational challenges of some schools by considering:</i></p> <ul style="list-style-type: none"> <li>• <i>The number of small schools within a school district, with different weightings and sizes used for elementary and secondary schools, and provide an increased contribution where a school is the only one in the community and is persistently under capacity; and</i></li> <li>• <i>The persistent over-capacity of schools at the school district level.</i></li> </ul>	
5	<p><i>The Ministry should replace all current supplements for enrolment decline and funding protection with a new, transitional, mechanism that allows school districts to manage the impact of enrolment decline over a three year rolling time period (i.e. allowing three years to manage the impact of decline, starting with no funding change in the first year, one-third funding reduction in the second year, two-thirds funding reduction in the third year, and fully implemented funding reduction in the fourth year).</i></p>	<ul style="list-style-type: none"> <li>• It is our belief that school districts must more quickly adapt to their demographic realities. If school districts have a strategic plan and a multi-year financial plan, as contained in recommendations #13, 14, &amp; 19, they should be able to adequately forecast future outcomes and respond timelier. To that end we would recommend further acceleration of the removal of supplements to one year.</li> </ul>

6

*The Ministry should create a single Inclusive Education Supplement that incorporates all the following:*

- *Supplemental Special Needs Funding;*
- *English/French Language Learning;*
- *Supplement for Vulnerable Students;*
- *CommunityLINK;*
- *Ready Set Learn;*
- *Supplemental Student Location Factor; and*
- *Funding currently in the Basic Allocation that was previously allocated to high incidence categories of special needs.*

*This single Inclusive Education Supplement should allocate funding through two components:*

*COMPONENT 1 - students requiring high-cost supports should be funded, and school districts should continue to report and claim these students to the Ministry for funding. Specifically:*

- *Funding eligibility criteria and the annual funding rate for students requiring high-cost supports should be developed and communicated by the Ministry, focusing on those students that are physically dependent and/or have needs that significantly impact the students' learning; and*
- *All funding claims in this category should be based on a medical diagnosis and should be subject to compliance audits to verify that eligibility criteria have been met.*

- We are very concerned by this recommendation. The adoption to prevalence base model funding appears to move away from existing alignment with health authorities and other ministry related funding programs
- This recommendation will undermine a fundamental dimension of providing equitable educational services to students with unique needs. That is, the provision of differentiated resources to schools and students, according to the learning needs of each student.
- An unintended consequence of this recommendation will be to unduly penalize school districts which have purposefully and systematically improved their services to students with unique needs. This is because of the natural tendency for parents and guardians to seek out schools and school districts that provide exceptionally good services to students.
- There is a broad-based view that some school districts are better at assessing students than a prevalence-based approach provides.
- In isolation this recommendation potentially under funds our most vulnerable children and undercuts educational equity.

6		<p><i>COMPONENT 2 - the remaining inclusive education funds should be allocated to school districts through a prevalence-based model, using a comprehensive range of third-party medical and socio-economic population data. Categories of data and weightings should be as follows:</i></p> <ul style="list-style-type: none"> <li>• <i>Health factors (50%)</i></li> <li>• <i>Children in care (20%)</i></li> <li>• <i>Income and Earnings (20%)</i></li> <li>• <i>English/French Language development (10%)</i></li> </ul>	<ul style="list-style-type: none"> <li>• Given past Ministry practice related to CommunityLINK prevalence-based funding, SD43 has been underfunded for many years despite provided data to the contrary. This is an outcome of not maintaining current data – a significant fear with the proposed model.</li> <li>• This recommendation potentially under resources our most vulnerable students and put the capacity of learning needs at risk-no response to local changes, to respond to need or reflect true student requirements.</li> <li>• A prevalence-based model is at odds with other government funding models, most specifically how the health authority is funded – on a needs-based model – which is more closely aligned with the current funding structure for this group of students.</li> </ul>
7		<p><i>The Ministry working with the Conseil scolaire francophone de la Colombie-Britannique (CSF), should develop a unique school district factor that recognizes the special characteristics of this province-wide school district, consistent with Recommendations 4, 5 and 6.</i></p>	<ul style="list-style-type: none"> <li>• We have no opinion on this recommendation</li> </ul>
8		<p><i>The Ministry should eliminate the Classroom Enhancement Fund and allocate this funding as part of school district operating grants. This will require negotiated changes to collective agreement provisions.</i></p>	<ul style="list-style-type: none"> <li>• We fully support this recommendation with one caveat. While this will ease administrative burden and substantial reporting requirements, we are concerned as to how individual school districts collective agreement costs associated with the restored language will be harmonized and monetarized into the block funding grant such that it does not harm individual districts.</li> </ul>
9		<p><i>The Ministry should base funding allocations for school-age educational programming on the number of students, rather than on the number of courses being taken. The Ministry should phase out the current course-based funding model by the 2020/21 school year.</i></p>	<ul style="list-style-type: none"> <li>• This recommendation will undermine the <u>Future Focus</u> dimension of the BC Ministry of Education’s <u>Policy for Student Success</u> because it will limit the development and availability of unique, creative and innovative course offerings. Similarly, it will limit the ability of school districts to achieve the stated Ministry objective of developing the “Educated Citizen” (Royal Commission on BC Education 1988 – the Sullivan Report). The recommendation represents a flip-flop in Ministry funding policy. This uncertainty and inconsistency are not supportive of the systemic change required by the re-designed competency-based curriculum, prescribed by the province.</li> </ul>

9		<ul style="list-style-type: none"> <li>• Loss of flexibility for students to change career path options for both post-secondary and trades by limiting to 8 blocks. This has the potential to reduce student’s success and grad rates by decreasing course opportunities.</li> <li>• May impact support for vulnerable students and special needs with reduced flexibility to support course failure.</li> <li>• Potentially reduces options for students by limiting course load to 8 and may be perceived politically as the reducing of fine arts or career related programs</li> <li>• Limits personalization as promoted by revised curriculum and potentially erodes student engagement reducing choice limiting broad based liberal arts education.</li> <li>• See comments under Recommendation #11, which appears to be at odds with recommendation #9.</li> </ul>
10	<p><i>With the 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 for all students in the province.</i></p>	<ul style="list-style-type: none"> <li>• We are concerned about changes to the DL delivery systems without first understanding its impact. We believe that a robust DL funding model should review should include how this can become the primary educational delivery model in significantly less populated areas of the province</li> <li>• While a Provincial (or regional) model may be the replacement outcome, a concern is the loss of face to face student: teacher time. There is measurable evidence that student success improves from a range of 50 to 60% to 90%+ with this contact.</li> <li>• Our concern around the emotional and physical wellbeing of students and students disengaging escalates without the occasional ‘check in’.</li> <li>• There is the potential loss of personalizing and enrichment and reduced options to support vulnerable learners and appears at odds with the new curriculum.</li> <li>• It will be necessary to look at existing DL and CE proگرامing policy requirements if changes are made.</li> </ul>



11		<p><i>Notwithstanding Recommendation 9, funding for the following programs should remain course-based:</i></p> <ul style="list-style-type: none"> <li>• <i>Graduated adults</i></li> <li>• <i>Non-graduated adults</i></li> <li>• <i>Continuing education (adult and school-age learners)</i></li> <li>• <i>Distributed learning (for adult learners only)</i></li> <li>• <i>Summer school (school-age learners)</i></li> </ul>	<ul style="list-style-type: none"> <li>• We agree with this recommendation; however, this appears to have some contradiction with recommendation #9 as summer learning is funded as an extra course or courses, but not ‘normal’ September to June funding as student get funded for 8 course and then 2 in summer. Why would a student not be able to take 10 during the normal school year? If so, then school age students could be funded up to 1.25FTE. It should not matter the time of year. This appears to compromise the proposed model.</li> </ul>
12		<p><i>The Ministry should establish a provincial accountability and reporting framework for the K-12 public education sector, including common principles and templates. This framework should have three to five broad, system-wide goals that are specific, measurable, and focused on student outcomes. The Ministry should monitor school district progress against these goals and work directly with school districts experiencing difficulty in meeting their objectives.</i></p>	<ul style="list-style-type: none"> <li>• We do not disagree with our understanding of the intent of this recommendation. We see the Ministry as the stakeholder and the Board as the Governors of the school district. The alignment of Board’s strategic plan with the Ministry of Education’s service plan should be flexible and adaptable. If a school district is exceeding Ministry goals and outcomes, then the Ministry should continue to allow enhanced flexibility to school districts and not impose a more rigid structure.</li> </ul>
13		<p><i>Boards of Education should be required to develop Strategic Plans that are based on the broad goals established by the Ministry, with flexibility to add additional goals based on local priorities.</i></p>	<ul style="list-style-type: none"> <li>• We agree with the importance of Boards having strategic plans and the including of the intended outcomes of broad-based Ministry goals. This has served us well in the past as a school district and has allowed us to achieve the student success levels we celebrate today.</li> </ul>
14		<p><i>As a critical component of good operational practice, Boards of Education should be required to strengthen their planning processes in the following ways:</i></p> <ul style="list-style-type: none"> <li>• <i>School district management should be required to develop operational plans to deliver on provincial and Board of Education goals across a range of areas (e.g. human resources, information technology, educational programs and services, facilities, finance).</i></li> </ul> <p><i>School district management should be required to issue a year-end report, at the same time as their financial statements, describing results achieved and how resources were utilized.</i></p>	<ul style="list-style-type: none"> <li>• We agree with the intended outcomes of this recommendations. A key measurement is 6-year graduation results which are not released at the same time as the audited financial statements. A statement on intended outcome with local Board autonomy to determine what this looks like is the appropriate approach.</li> </ul>

15	<p><i>Consistent with the shift to supporting student improvement and learning, the Ministry should:</i></p> <ul style="list-style-type: none"> <li>• <i>Shift the focus of the Compliance Audit Program from purely financial to have a quality assurance emphasis that incorporates best practices-based recommendations regarding student outcomes, structure of programs and services, and overall management of school district operations.</i></li> <li>• <i>Defer the recovery of funding for one year, to allow school districts time to adopt compliance team recommendations. This one-year deferral would not be available if it is determined that there has been deliberate contravention of funding eligibility policies.</i></li> </ul>	<ul style="list-style-type: none"> <li>• We agree. Audits should not be punitive at the outset, but a process to bring supporting documentation into alignment with best practices.</li> </ul>
16	<p><i>The Ministry should provide ongoing provincial leadership and support to help strengthen governance and management capacity at all leadership levels in school districts.</i></p>	<ul style="list-style-type: none"> <li>• We agree. Succession planning is a fundamental underpinning to provide the pathway and provide the building block resource for successful student achievement. The parts all work together.</li> <li>• Who funds the incremental costs associated with this item?</li> </ul>
17	<p><i>The Ministry should expand its workforce planning project and work with school districts to establish a provincial K-12 human capital plan.</i></p>	<ul style="list-style-type: none"> <li>• We agree as noted in recommendation #16</li> </ul>
18	<p><i>The Ministry should identify net cost pressures and new program expenditures and, as part of the annual provincial budgeting process, bring them forward to Treasury Board for consideration when the total quantum of public education funding is being set.</i></p>	<ul style="list-style-type: none"> <li>• A lack of inflation funding erodes basic grant funding. The number of new or changing programs introduced onto school districts over the past number of years has been significant.</li> <li>• Speak to mental health services</li> </ul>
19	<p><i>To support multi-year financial planning:</i></p> <ul style="list-style-type: none"> <li>• <i>Government should issue three-year operating funding to Boards of Education, based on available funding and projected student enrolment; and</i></li> <li>• <i>School districts should be required to develop three-year financial plans.</i></li> </ul>	<ul style="list-style-type: none"> <li>• We agree. This provides the stability that is required to operate with a reduced accumulated surplus.</li> </ul>

20	<p><i>The Ministry should establish clear provincial policies on reserves to ensure consistent and transparent reporting, while maintaining school districts' ability to establish reserves. Specifically, the Ministry should:</i></p> <ul style="list-style-type: none"> <li>• <i>Set clear provincial policies on what school districts may save for, directly related to their strategic plans;</i></li> <li>• <i>Establish an acceptable provincial range for unrestricted reserves, encompassing accumulated operating surpluses and local capital, which should be monitored and reported on (if required);</i></li> <li>• <i>Ensure that school districts have specific plans attached to each item or initiative when setting reserves, and provide clear reporting on how the funds were spent; and</i></li> </ul> <p><i>Work with school districts to transfer any overages beyond the approved threshold into a fund at the school district level, to be accessed only with Ministry approval.</i></p>	<ul style="list-style-type: none"> <li>• We believe it would be helpful to have guidelines around accumulated surplus/reserves. We also think it important to distinguish between the source of reserves – whether its from entrepreneurial local generated non-grant revenues or from grant revenue. The Ministry should not place restrictions on non-grant revenue reserves.</li> <li>• Working capital reserves are currently at industry level standards.</li> <li>• Alberta and Manitoba operating surplus reserves are at 4% so a range of 3 – 5% for BC schools appears appropriate – provided there is flexibility for unique school district situations.</li> <li>• It is not practical to zero net budget without the ability to have some reserves for extenuating our unforeseen circumstances.</li> </ul>
21	<p><i>There should be no change in the way that locally-generate revenues are treated by the Ministry when calculating operating funding for school districts.</i></p>	<ul style="list-style-type: none"> <li>• We fully agree. Entrepreneurial endeavours should not be penalized but rather celebrated.</li> </ul>
22	<p><i>In the current absence of dedicated funding for some capital expenditures, the Ministry should either:</i></p> <ul style="list-style-type: none"> <li>• <i>Provide capital funding for expenditures that are currently not reflected in the capital program; or</i></li> <li>• <i>Clarify which items are ineligible for capital program funding and ensure that school districts are permitted to establish appropriate reserves that allow them to save for these purchases on their own (i.e. accumulated operating surplus, local capital).</i></li> </ul>	<ul style="list-style-type: none"> <li>• We fully agree. To take funds out of the classroom - intended for developing student success and achievement - to fund capital projects is flawed.</li> <li>• Government must more adequately fund capital programs in a timely manner</li> </ul>



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