



June 13, 2019

Via email: k12fundingreview@gov.bc.ca
educ.minister@gov.bc.ca

The Honourable Rob Fleming

Ministry of Education

PO Box 9045

Stn Provincial Government

Victoria, BC V8W 9E2

Dear Minister Fleming:

Re: Funding Model Review Response

The Board of Education of Southeast Kootenay School District No. 05 respectfully requests the acceptance of the following response with respect to the funding model review consultation undertaken by the Ministry of Education. We appreciate the consideration of our response.

We would like to start-off by acknowledging the extensive consultation process and work that has taken place thus far by the Ministry and the Independent Panel. This process proves to be inclusive and transparent.

As the Board reviewed the 22 recommendations, the following guidelines were prominent in our discussions of the new funding formula:

- the continued commitment to the high level of education should be maintained for our students;
- adequate time should be provided in order to allow the appropriate planning and implementation;
- autonomy should be maintained by the local districts, under governance of the respective Boards of Education, to deliver programs that meet the needs of its' districts unique circumstances; and
- the funding model should create better planning opportunities and sustainability to allow districts to plan for the future.

Our response addresses the following recommendations for which the Board believes to be of significance to our district.

Theme 1: Equity of Educational Opportunity

RECOMMENDATION 4

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:

COMPONENT 1- 'Unique School District' characteristics should reflect some of the operational challenges of school districts compared to the norm by considering:

- The enrolment of a school district compared to the provincial median school district enrolment;
- The distance from communities containing schools to geographic centres containing basic services;
- 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;
- The distribution of students and schools across a school district, as characterized by:
- The density of the student population in a school district, compared to the highest density school district in the province;
- The average distance from each school to the school board office, including the effect of geographic features; and
- A modification of the current salary differential funding approach to be based on total compensation and expanded to include all school district employees.

COMPONENT 2- 'Unique School' characteristics, not addressed in the first component, should recognize the operational challenges of some schools by considering:

- 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
- The persistent over-capacity of schools at the school district level.

Response:

Our view is that we do not want these components to be managed by the Ministry. Although, this strategy may work well with teachers as there is a provincial grid in place, which specifies salaries based on tenure and education, it is not as simple to use an average for all other positions within a given district. Due to regional differences, remoteness, economic and environment challenges, the Board believes we need to maintain the ability to adjust these salaries in order to appropriately recruit and retain employees. We believe this will have a negative impact to our district as it would require the district to potentially pay more for salaries and take away from other services provided to students.

RECOMMENDATION 6

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

- Supplemental Special Needs Funding;
- English/French Language Learning;
- Supplement for Vulnerable Students;
- CommunityLINK;
- ReadySetLearn;
- 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:

COMPONENT1—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.

COMPONENT—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:

- Health factors (50%)
- Children in care (20%)
- Income and earnings (20%)
- English/French Language development (10%)

Response:

The Board believes there is not enough information available to adequately address this recommendation. We will note that a current issue we face is that our district as a whole does not have above the provincial average of vulnerable students, although we do see schools within our district where greater supports are required than others. The Board wants to ensure the needs of students are met and that resources are funded.

Given the uniqueness of our district with respect to the geographical distances, and diversity within our communities, we are concerned that this recommendation may not address specific needs of our school district and more specifically the real obstacles we face which are out of our control. Under the current

model, there are additional funds allocated to address some of our uniqueness through but we believe we could experience a loss of funding under this recommendation.

RECOMMENDATION 8

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.

Response:

Although we recognize the Classroom Enhancement Fund as a temporary measure to ensure restored contract language receives appropriate funding from the Ministry, we believe more information is required in this regard. As not all school districts have class composition language, we want to ensure future collective agreement language is properly funded given the language in local and provincial contracts.

RECOMMENDATION 9

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.

Response:

The Board opposes this recommendation as we believe this will have a negative impact as the options available to students will be significantly limited. We have students who pursue additional courses outside of their regular timetable for various reasons (drama programs, specialty classes not offered during regular school hours, expedite graduation, etc). Under the current funding model, the increased funding allow the administration to offer a greater selection of courses to the students. For example, Mount Baker Secondary has 25-50 additional FTE each year due to students taking courses outside of their timetable. This allows the band program, theatre productions, athletic performance courses, etc to be offered. A change to this funding could see a decrease of 2-3 teachers at Mount Baker High School alone.

RECOMMENDATION 10

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.

Response:

The Board believes more information is required to adequately address this recommendation. If taken in context of recommendation 11, we believe the appropriate format would be course based funding.

RECOMMENDATION 11

Notwithstanding Recommendation 9, funding for the following programs should remain course-based:

- Graduated adults
- Non-graduated adults
- Continuing education (adult and school-age learners)
- Distributed learning (for adult learners only)
- Summer school (school-age learners)

Response:

The Board agrees with the above recommendation. The area of concern is with school aged distributed learners. Specifically we are identifying students who want to take additional courses for various reasons. We believe these students should be included in course-based funding to avoid transparency issues with where a student's funding arises.

Theme 2: Accountability

RECOMMENDATION 12

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.

RECOMMENDATION 13

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.

Response (12 and 13):

We believe that Boards are currently accountable to their local communities and students. Good governance would dictate that strategic plans are created and implemented by the local Boards. The concern of our Board is whether autonomy will be lost and, furthermore, if funding will be impacted in the event the financial or educational results do not meet strategic plans prescribed by the Ministry.

RECOMMENDATION 14

As a critical component of good operational practice, Boards of Education should be required to strengthen their planning processes in the following ways:

- 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).

- 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.

Response:

We have a concern about the reporting requirements and the administration around the reports and operational plans as it is contrary to the streamlining efforts of the Ministry of Education and this Funding Review. This will especially have an impact on our district as we have limited resources to assist with the compilation of these reports.

RECOMMENDATION 15

Consistent with the shift to supporting student improvement and learning, the Ministry should:

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.

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.

Response:

The Board has concerns regarding how the quality assurance standards will be developed. We are also seeking additional clarification around the impact on student success. The Board believes there is merit for our district with moving from purely financial to quality assurance but seeks additional information on how this process will work in practice.

RECOMMENDATION 17

The Ministry should expand its workforce planning project and work with school districts to establish a Provincial K-12 human capital plan.

Response:

The Board believes this would be better suited for a provincial body, such as BCPSEA, to administer given the nature of the recommendation. The Board questions why this recommendation is included in the funding model review.

Theme 3: Financial Management

RECOMMENDATION 18

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.

Response:

The Board believes this currently occurs and appears to be working well. A question arose with respect to the pressures of all salaries of the district and our ability to address this with PSEC and the Treasury Board to ensure they are funded appropriately.

RECOMMENDATION 19

To support multi-year financial planning:

- Government should issue three-year operating funding to Boards of Education, based on available funding and projected student enrolment; and
- School districts should be required to develop three-year financial plans.

Response:

The Board believes planning is a key component of sustainability. The Board has concerns around the value of a three-year model given the ability of the Government to provide certainty on the funding, potential changes in Government, or changes to the economy all of which will have an impact on future Education Budgets. We also believe there will be a significant drain on resources such as our districts where accounting personnel is limited and already at capacity.

RECOMMENDATION 22

In the current absence of dedicated funding for some capital expenditures, the Ministry should either:

- a) Provide capital funding for expenditures that are currently not reflected in the capital program; **or**
- b) Clarify which items are ineligible for capital program funding and ensure 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).

Response:

The Board believes items not currently reflected under capital funding should be expanded, more specifically to allow portables to be covered. To meet the needs of our students we have spent approximately \$3M out of local capital or operating surplus to provide adequate space for our students.

In addition, we also believe that there should be clarity on capital items permitted to be purchased through accumulated surpluses. This allows district to plan for long-term projects. We also acknowledge that capital planning should not be at an expense to operational reductions as this has a direct impact on the short term ability to deliver education.

Conclusion

The Board agrees that there are areas within the funding model which need to be updated. Our main concerns are the timeline for implementation and impact to each district with respect to the ability to

deliver quality education to the students. Additionally, we note that districts have relied on the current funding model for many years. Throughout our review of the recommendations we have identified areas which create concern with respect to “winners” and “losers”. This can be mitigated through transitional implementation and thoughtful consultation with districts during the remainder of the funding model review process.

We believe the implementation date of 2020-21 school year to be ambitious, given the concerns we have addressed and review of submissions from other districts.

Lastly, we believe the overall funding for education needs to be increased in order to properly deliver education to the students and to ensure there are no losers with the funding model changes. As part of this, we are experiencing a greater number of students with unique learning needs and we are allocating far more funds to support these students than is currently provided through funding to our district. This supports our position that creating a single per student funding allocation will not address the uniqueness of the various districts across our province.

Sincerely,

A handwritten signature in black ink, appearing to read 'Frank Lento', with a stylized flourish above the name.

Frank Lento, Chairperson
School District No. 05 (Southeast Kootenay)

cc: Trustees

Lynn Hauptman, Superintendent

Alan Rice, Secretary Treasurer