



March 19, 2019

The Honourable Rob Fleming
Minister of Education
P.O. Box 9045 Stn Prov Govt
Victoria, B.C. V8W 9E2

Dear Minister Fleming,

The Board of Education for SD72 (Campbell River) appreciates this opportunity to provide input on the *Report of the Funding Model Review Panel 2018*. The Board has studied the recommendations presented in this report, and while it agrees with the majority of recommendations, it has serious concerns about several others. This response will address each of those recommendations.

Recommendations 1, 2, 3, 5, 7, 8, 10, 14, 16, 17, 18, 20, 21, 22: The Board of Education for SD72 (Campbell River) concurs with these recommendations.

Recommendation 4

Component 1: Unique School District characteristics should reflect some of the operational challenges of school districts compared to the norm by considering (etc.)

The success of this recommendation will largely rest upon the development of a comprehensive, inclusive mechanism or template that will address all these factors, in a way that will allow the data to be interpreted in a meaningful and consistent way from district to district.

Recommendation 6:

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.

In general the Board concurs with this recommendation, however, it believes that the words ‘adequately’ or ‘fully’ should be included so that the recommendation reads: “**Component 1 - students requiring high-cost supports should be fully/adequately funded,...**”

Additionally, this component should not just include students that are physically dependent or deaf blind (currently our students designated as category A or B). This component should also include any student requiring full-time support, for example, students who are non-verbal and have autism. These students often require as many supports as our physically dependent students.

Component 2 – ‘...the remaining inclusive education funds...Categories of data and weighting should be as follows: Health Factors 50%

It is imperative that emotional and mental health, as well as physical or physiological conditions, be included in this category.

When data is based on availability of services, the information doesn't necessarily reflect accurate numbers; for example we would have more children in care in Campbell River if more foster homes were available.

The Board has concerns about funding students in need of additional support on what is commonly referred to as the ‘prevalence model’. Experience in Ontario, which has had this model in place for some years now, indicates that many students who were previously designated as needing extra support now are not designated. Funding for these students has declined along with the extra support that these designations generated, according to the Elementary Teachers’ Federation of Ontario (ETFO), and the Ontario Secondary School Teachers’ Federation (OSSTF). This recommendation appears to indicate that student testing is unnecessarily costly and is done to generate funding support. The Board believes that children experiencing greater than average educational or other difficulties should be tested in order to better inform and direct the interventions that are required to effectively support them. This is a necessary cost.

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 recommendation to change funding from the number of courses being taken to the number of students is of particular concern to SD72. Presently, students are able to take up to 12 courses (1.5 FTE). During the 2018-2019 academic year the district’s two high schools have had a significant number of students taking extra courses. Our current projections for the 2019-2020 school year show Carihi Secondary with 816 students and an estimated FTE of 865 students, while Timberline Secondary with 696 students has an estimated FTE of 737. Those 90 equivalent FTE students generate 4.5 teachers which allow those schools to provide exceptional courses outside of regular school hours. These offerings are sustainable only because of this course funding. In SD72 all FTE generated funds directly support staffing for these courses several of which are locally developed and unique to this district. Changing the funding model without a corresponding increase in FTE funding will change the innovative and engaging cultures of both schools. The change from FTE

funding will ultimately be detrimental as it will reduce or eliminate those course offerings that students are finding to be extremely valuable.

Recommendation 11: The Board believes that concerns related to this recommendation have been addressed by the report submitted by the British Columbia Distributed Learning Administrators' Association (BCDLAA).

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.

In general the Board of Education for SD72 (Campbell River) concurs with this recommendation, but it has concerns that it could lead to more centralized control of local Boards by the Minister of Education. The Board has questions about how '*...work(ing) directly with school districts experiencing difficulty in meeting their objectives.*' would be manifested. More detail is required in this area.

Recommendation 13:

Boards of Education should be required to develop Strategic Plans that are based on broad goals established by the Ministry, with flexibility to add additional goals based on local priorities.

The Board is concerned that this recommendation gives priority to centralized goals established by the Ministry with local priorities being secondary. Centralization of what were previously Board responsibilities poses several questions and further details are necessary for the Board to adequately respond to this recommendation.

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...*

In general the Board concurs with this recommendation, but auditors must be aware of the current shortages of both specialty support personnel such as vision teachers and psychologists, as well as educational assistants. The phrase, '*student improvement*' is one which might bear further examination.

Recommendation 19:

To support multi-year financial planning government should issue three-year operating funds to Boards of Education, based on available funding and projected student enrolment.

In general the Board concurs with this recommendation. Implementation would provide stability and predictability. However, the Board has concerns with the sustainability of funding, should funding be based '*...on available funding.*' The Board believes that funding should be **adequate** as opposed to 'available'. Since funding of any government function, including public education, is essentially a political decision, this phrase allows governments to justify underfunding public education. Many years ago the government of the day used the similar phrase, '*ability to pay*', to justify reductions in education funding.

The Board experienced some difficulty in fully addressing the recommendations of the '*Report of the Funding Model Review Panel*' as a consequence of the lack of detail in the recommendations. It would be of great assistance if, at some time in the near future, the Ministry could provide examples of comparable funding allocations under the present system and under the system that would exist if the panel's recommendations are fully adopted.

Finally, the Board of Education for SD72 takes issue with the statement in the Executive Summary on page 5 "*...with many stakeholders expressing the view that the system is not funded adequately. This has meant that much of the focus has been on adequacy of funding rather than student achievement.*"

It is the considered opinion of this Board that adequate funding and student achievement are inextricably linked. Many Boards across the province, as does SD72, run structural deficits using unrestricted reserves to provide education programming that they believe is necessary to address and improve student achievement. In SD72, as a result of the Supreme Court decision, the funding that was ordered to restore the illegally stripped contract language has been welcomed. However, over the past three years there have been no corresponding increases in operational funding to address inflation and the increased costs of utilities and materials necessary to adequately run and maintain our schools. This shortfall must be addressed.

The Board appreciates the opportunity to respond to the '*Report of the Funding Model Review Panel 2018*' and hope that its comments provide information which will be helpful in implementing these recommendations in the future. It is challenging to respond fully to some recommendations because details at this time of the process are missing.

As part of the implementation process, the Board respectfully submits the idea of running a pilot with a few districts who would represent typical situations. These should include large urban, mid-sized urban, smaller urban, remote, northern, and rural or any other specific category of school district.

The Board has submitted this response in the hopes that its suggestions would assist in the fleshing out of details for recommendations for which it has expressed concern. Changes to the Funding formula can be positive, but they should include consideration of suggestions that have been made by Boards in response to the initial recommendations.

Again, thank you for providing Boards a meaningful opportunity to respond to this initiative.

Sincerely,

A black rectangular redaction box covers the signature of Richard Franklin. A handwritten mark, possibly initials, is visible above the redaction.

Richard Franklin
Board Chair,
School District 72 (Campbell River)

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