



BC Confederation of
Parent Advisory Councils

BC Confederation of Parent Advisory Councils (BCCPAC)

Presentation to

The Select Standing Committee on Finance and Government Services

Public Hearing:

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Submitted by

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on behalf of BCCPAC

Introduction

The [BC Confederation of Parent Advisory Councils](#) (BCCPAC) is again pleased to have the opportunity to present its recommendations on public education priorities for the 2019 provincial budget to the Select Standing Committee on Finance and Government Services.

BCCPAC, a non-partisan registered non-profit charity in operation since 1922, represents the parents/guardians of over 565,000 children attending provincial public schools. Recognized by the provincial government and education partners, BCCPAC is the collective voice of parents on educational issues within the public system. We strive to foster a culture of acceptance, diversity and inclusion in our public schools and advocate both for systemic changes and individual parent advocacy. BCCPAC is governed by a volunteer board of nine directors elected annually by the membership; our District Parent Advisory Councils (DPAC) membership represents 96% of parents in public education and Parent Advisory Councils (PAC) from school districts across the province.

The [Select Standing Committee for Finance and Government Services](#) (2014/15, 2015/16, 2016/17, and 2017/18) affirmed that public education is not adequately supported by public funds. This Committee has [recommended](#) “the importance of equity and fairness within the K-12 system in order to ensure that the diverse needs of communities across the province are met, and that all students, including those with special needs, receive a high-quality public education”. The government’s own policy on diversity clearly articulates government responsibility to ensure that “differences among learners do not impede their participation in school, their mastery of learning outcomes, or their ability to become contributing members of society.” And the Committee further stated, “Government should review the overall per-pupil funding formula to ensure it reflects the real costs of providing education in each school district”. BCCPAC fully supports the K-12 funding recommendations made in the previous four reports of this Committee.

The [BC School Act](#) sets out the purpose of the provincial education system: to “enable all learners—regardless of race, gender, ability or economic means—to become literate, to develop their individual potential and to acquire the knowledge, skills and attitudes needed to contribute to a healthy, democratic and pluralistic society and a prosperous and sustainable economy”. Additionally, the [BC Statement of Education Policy Order](#) (Mandate for the School System) affirms government’s responsibility for the equitable provision of high quality education to encompass the full range of human development across intellectual, physical, moral and aesthetic spheres. The government’s own policy on diversity clearly articulates government responsibility to ensure that “differences among learners do not impede their participation in school, their mastery of learning outcomes, or their ability to become contributing members of society.”

We are pleased the Ministry of Education is “committed to fostering a flexible, personalized and sustainable education system, which is focused on strong outcomes and equitable access to educational opportunities for all students.” We commend the Ministry for undertaking the long-overdue and significant task of a revision of the K-12 funding model. The education system plays a crucial role in preparing students for the future, and must be reflective of our society.

As the provincially mandated voice of parents uniquely representing student interests, our comments and recommendations reflect our own Mission and Vision and the numerous member Resolutions that have been passed advocating for changes to address local district and larger provincial concerns. We have identified four key recommendations that are critical for every student to have equitable access to public education with the supports and services they need to succeed according to the School Act.

Recommendation 1: Provide Stable Funding

That the provincial government act now on the recommendations from the past four years of the Select Standing Committee on Finance and Government Services that have called for adequate, stable, and predictable funding for K-12 public education.

Recommendation 2: Create a Student-Centered Funding Model

That the provincial government with the Ministry of Education continue the process of the Funding Model Review and develop a new needs-based, stable, sustainable and transparent model for the K-12 public system for Budget 2019. Changes to the funding formula need to be student-centric and be consistent with changes to the Special Education Policy, reflect the diverse challenges of individual school districts, equitable funding across the regions, provide the supports and resources needed to meet the diversity of all students' educational needs and meet the real costs of delivering public education across the province.

Recommendation 3: Increase Operational Funding

That the provincial government increase K-12 public education operational funding in Budget 2019 to reflect the actual fixed operating costs of operating school facilities and cover all the downloaded costs to school districts, as well as inflationary costs including:

Student Funding Increase:

- Funding for high-incidence special needs and gifted students be significantly increased now and ongoing, to support the early identification and assessment required to obtain "designations" needed for intervention and support for students' academic, physical, behavioural, social and/or emotional challenges.

Supplemental Funding Increases:

- Funding for Special Needs Categories 1, 2 & 3 be significantly increased to meet the actual costs of delivering necessary service and supports to low-incidence special needs students.
- The implementation of a classroom resource fund similar in structure to the now dormant Learning Improvement Fund (LIF) to address unique classroom needs.
- Unique Geographic Factors funding be increased to implement a recruitment and retention strategy for rural and remote districts, and that transportation funding reflect actual costs.

Special Purpose Funding:

- Immediate increased funding and resources must be provided to address the backlog of students waiting for formal assessment.
- Supplemental Grant for the Implementation of the Education Plan be extended in the 2019 Budget to provide the necessary resources and technology to effectively implement new curriculum

Recommendation 4: Increase Capital Funding

That the Treasury fund portables, where necessary, for temporary accommodation during seismic upgrades; create special bridge-funding to cover the cost of portables until the reliance is eliminated.

That the Ministry of Education develop a plan and timelines to replace old schools where existing schools are close to or exceeding their life expectancy, to address the soaring deferred maintenance costs.

That the Ministry of Education and the provincial government develop a strategy to proactive fund new school construction in areas of current/anticipated population growth based on census data and municipal plans.

That the Ministry of Education revise the current Ministry Area Standards as it is the basis for all upgrades and new school builds. The current Area Standards document is centred on the classroom as a self-contained unit for whole-group, teacher-driven content delivery. By contrast, 21st century learning and the new curriculum requires a range of flexible spaces in and beyond the classroom to support personalized learning, collaboration and experiential, hands-on learning.



Background and Context

In 2002 the Provincial government [introduced measures](#) that altered the funding for public education from a school and needs-based formula to [per-pupil based formula](#).

While the total annual funding dollars going towards education has increased, the allocation for public education has not kept pace with inflation, increases in contract agreements or rising operational and maintenance expenses or the increased numbers of students identified, or suspected, high and low incidence special needs. In terms of per-pupil funding and percentage of GDP, [BC has fallen behind the rest of Canada](#). A 0.9% decline in the share of GDP dedicated to education funding [represents about \\$2 billion per year](#).

BC lags behind the rest of Canada in terms of spending per student, growth in education expenditures since 2008-2009 and student to educator ratio. In the five-year period [2008-2009 to 2012-2013](#), the average expenditure per student in Canada increased 14.1% whereas BC increased only by 6.5%. The average expenditure per student nationally for 2012-2013 was \$12,377 while BC remained at \$12,113. If BC matched the \$12,377 average national expenditure, it translates to \$143 million more in funding for the province's 565,000 students.

Local communities and school boards are in the best position to discern what students and the community need yet there is no viable way for school boards to influence or control the total amount of money they receive. The current funding model and the total amount of money for public education does not adequately meet the needs of all of our students. The principle that every student in the province should have an equal opportunity to be educated per the School Act is not the reality across BC; unequal opportunities to learn exist and reflect both economic and social inequalities and the impact of unequal capacity to raise funds through charity, student fees or parental fundraising to offset the lack of adequate funding within the system.

Adequately funding public education is not about whether or not we have the funding, it is a choice in priorities and spending made by the government. Unpredictable funding and unfunded cost increases (all downloaded to school districts, many of which have increased over inflation) require school districts to spend time and resources on balancing budgets each year instead of strategically planning the most effective use of funding to support student success.

Successful implementation of the new curriculum requires sufficient funding to support in-service, collaboration time and learning resources. Public education and our children need funding that meets the true need and cost of delivering public education across the province, allowing for rural and urban uniqueness.

Funding Model & Funding Concerns: Operational

The long-term cuts—both direct and indirect—to public education services and supports has impeded the ability of many school districts to sustain the delivery of quality education programs and services to children while also maintaining a balanced budget as required by the School Act. Parents have asserted that a [flexible funding formula](#) that meets the varied needs of all school districts is required. Over the last two decades, [parent leaders have repeatedly voiced concerns](#) that funds allocated by the Ministry of Education do not fully meet the needs of BC students and through BCCPAC have collectively called for more funding to public education. Parents from across the province have [voiced the need for long term and stable financial support](#) for public schools with increased levels of funding to meet the actual costs of delivering necessary services to our students.

Despite recent funding to public education to comply with the Supreme Court ruling, there are other areas of support that still require funding to the student allocations to restore services that have been cut as school districts try to maintain smaller class sizes and specialist teacher ratios such as educational assistants, custodial services, occupational therapists, physiotherapists and English Language Learner (ELL) Services.

Parent across the province ask that downloaded cost pressures such as provincially negotiated wage settlements and collective agreements, energy rate increases must be fully funded annually as additional increases to operating funding and that each year's public education funding amount be adjusted for inflation.

One of the most significant changes, however, has had direct impact on the services and supports to students with special needs. The former model (pre-2002/03) provided targeted funding for low-incidence/high-cost (low incidence) special needs, high-incidence/low cost (high incidence) special needs and gifted.

The current model rolled funding for high-incidence special needs students (Designations K,Q,R) and gifted (Designation P) into the per-pupil funding allocation and separated supplementary funding for low-incidence special needs categories 1, 2 & 3 (Designations (A-H).

According to the current [BC K-12 Funding Special Needs Policy](#) statement:

"Students with special needs may require additional support and accommodations to enable them to access and participate in educational programs. The Basic Allocation, a standard amount of money provided per school age student enrolled in a school district, includes funds to support the learning needs of students who are identified as having learning disabilities, mild intellectual disabilities, students requiring moderate behaviour supports and students who are gifted."

Over the last sixteen years, many have forgotten that the original per-pupil funding was intended to cover all needs of high incidence special needs students such as early intervention, assessment, service and support for a range of students with varying diagnoses such as dyslexia, ADHD and students requiring behaviour support. The supplemental Funding for Special Needs was intended to cover the unique requirements of low incidence special needs students.

Additionally, parents of [gifted students](#) are concerned that diagnosis and assessment of gifted students, and subsequent programs has declined since targeted funding for gifted education has been eliminated. Designated Gifted students has dropped from 2.5% of students in 2002 to [0.9% of students in 2016/17](#). We hear from parents that some schools refuse to assess or identify students for a gifted designation because there is no funding available.

Unfortunately, many families of students with learning differences report to BCCPAC that they are told that unless they have a designation that qualifies for funding they will receive no additional supports. The current [funding formula does not address](#) the actual costs of delivering necessary services and supports to [individual students](#) or complex classrooms that present challenging learning conditions.

Significant increases to the funding allocations and accountability for same are required for high-incidence students to receive the additional supports and services they require.

Address Formal Assessment Wait Times and Delays

There is an acknowledged gap in resources and supports for special needs and other vulnerable students, including early identification, designation and programming for these learners. Exacerbating the current inadequate levels of special needs supports, is the long wait time for formal assessments of students who have been identified as having a learning difference. According to BCCPAC members, wait lists of three and four years are sadly common. As a result, many frustrated parents opt to have their children assessed privately in order to hasten the implementation of supports and intervention for their children. This has created an inequity in the public education system, as costs of psycho-educational assessments are borne by parents who are financially able, and other students wait years for intervention and assessment. All students—regardless of their family economic situation—deserve timely early intervention and assessment.

Immediate [increased funding and resources](#) must be provided to address the backlog of students waiting for assessment. Additionally, ongoing funding must be increased to school districts, to support the early identification and assessment required to obtain "designations" needed for intervention and support for students' academic, physical, behavioural, social and/or emotional challenges.

Increase Supplemental Special Needs Funding

[Parents have strongly reiterated](#) the need to increase provincial funding to cover the true cost of meeting the requirements of designated and non-designated students with special needs in accordance with Ministry of Education guidelines for special education and inclusion.



Prior to 2005, students with low-incidence special needs received targeted supplemental funding. In 2005 that changed and districts distributed their pooled supplemental funding to meet their district priorities. The current level of funding for Level 1, 2 & 3 special needs funding is inadequate to meet the resources and supports of our most vulnerable learners.

For example, Level 2 funding is inadequate for the average necessary supports and services for a student with autism or visual impairment. The current level of funding would not be able to even cover the full costs of a half-time educational assistant and the adaptive equipment that would make these students thrive. Our students deserve better.

An immediate significant increase is needed to bring supplemental special needs funding in-line with the actual costs of services and supports that our special needs students require. All students deserve access to a full day of school. The lack of sufficient and trained educational assistant coverage when a regularly assigned educational assistant is absent, is of grave concern to parents of special needs students.

Based on a [survey conducted by BCCPAC in September 2017](#) and current reports from parents, a startling number of students are not receiving a full day of educational instruction. Many parents of special needs students reported that due to lack of supports, special needs students were regularly not scheduled for a full day at school, parents were asked to keep their children at home when their supports were cancelled for the day due to illness or absence, and parents were asked to pick up their children from school when they had a behavioural incident.

Addition of New Supplemental Funding—Classroom Resource Fund

Often, the dynamics of a classroom (i.e. the particular combination of students and staff) create some unique needs that require extra supports and resources that would not fall within one of the current funding categories. As such, BCCPAC [members recommend](#) an additional supplementary funding envelope to specifically address classroom resources and needs to support to inclusion and equity in opportunity. Classroom needs are unique to the grouping of students and staff within that classroom. There are factors besides numbers that influence the dynamics and level of support and intervention required by classroom students: environment, demographics, social, emotional & communication skills, English language proficiency and age are only some of the factors that influence the dynamics of a group. Classroom needs include learning needs in addition to classroom management needs and are unique to the grouping of children in the class.

Continuation of the Supplemental Grant for the Education Plan

[Parents have asserted](#) the need for necessary resources and technology to effectively implement the new curriculum. BCCPAC asks for the continuation of the Supplemental Grant for the Education plan of \$20/per student (minimum \$10,000 per district) to assist districts with the implementation of the Education Plan.

Funding Model & Funding Concerns: Capital

Seismic & New Builds

The provincial government initiated its [Seismic Mitigation Plan](#) (SMP) in 2004 and identified 342 High Risk schools across the province. Buildings that are designated “High Risk” are likely to suffer structural failure (collapse) during even a moderate earthquake and be unusable afterwards. In 2005, the government promised British Columbians that “all at-risk schools in BC would be seismically upgraded by 2020.” In 2013, the provincial government stated it would be up to school districts to “confirm the scope, schedule, budget and risks” associated with individual seismic projects before they will receive approval to move to the design and construction phase. In 2015, delays were caused by disagreements over the scope of the projects. The initial 2020 completion date for 347 upgrades was pushed back to 2025, and for Vancouver as late as 2030.

As of [September 2018](#), 178 upgrades have been completed, 15 are “proceeding to construction” (but work not begun), 14 are “under construction” (but many have not yet broken ground), and 36 are at the “business-case” stage. Additionally, the categorizations of H1, H2 and H3 have also been removed from this report.

With the government’s existing revised target date of 2025/2030 fast approaching, there remain >104 schools which have not truly even begun the seismic approval process; the majority of these are in Vancouver, Richmond, and Surrey. Currently thousands of BC students— in addition to thousands of teachers, administrators, and support staff—spend their days in “High Risk” schools.

In 2008, the [BC Auditor General](#) reported “Southwestern BC is an earthquake environment similar to that of the coasts of Japan, Alaska, and Central and South America.” The [Great BC Shakeout](#) will again take place on October 18th in schools across the province; regrettably this activity will not save students and staff in buildings that cannot withstand a major earthquake.

In 2005, [the government stipulated](#) as part of the SMP that due to the age and poor quality of many of the schools at risk throughout the province and the expense required to bring and maintain these buildings to acceptable health and safety standards, replacement schools should be built instead of upgrading existing structures, if the cost of seismically upgrading was more than 70% of the cost of *building a new school*.

Retrofitting or upgrading an existing school building such that it can hopefully withstand an earthquake and allow students and staff to exit and survive is often the lowest-cost choice, as opposed to replacing it with a new building. However, retrofitted buildings are designed only to meet the standard of ensuring occupants exit safely—unlikely to be achievable in a major earthquake—they are not designed to be usable afterwards. Replacement/new buildings are designed to be usable the next day. It’s short-sighted to save a small amount of money and risk countless lives by doing retrofits when it will be much more expensive later when we need to rebuild these schools after an earthquake. Schools are the heart of the community and will be required as emergency shelters and to help return to normalcy.

Replacing an old school will also eliminate millions in deferred maintenance costs—Vancouver alone has over \$700 million in deferred maintenance. These are buildings that, in addition to being seismically unsafe, contain lead pipes, lead paint, and asbestos, are not easily accessible, lack sufficient facilities like washrooms, and aren't designed to enable 21st-century learning and the new curriculum. These issues are not necessarily addressed during a seismic retrofit.

Portables within Capital Budget

The Ministry of Education has not historically paid for students to be accommodated in portables while their schools were being upgraded; the cost of portables is not covered within capital budgets but is a cost downloaded to school districts within their operational budgets. Between the actual physical portable, to moving it, placing it, wiring it, and the carbon tax associated, funding portables is a significant drain on the operational budget. This lessens, by millions of dollars per year, funding that was intended for student resources; we should not take away from student resources because the government is inadequately funding school capital infrastructure.

Many schools, particularly in rapidly-growing districts, are overcrowded, and as a result a reliance on portables continues. Understanding the challenges of districts who currently fund the cost of portables out of their operating budgets, this Committee has already heard how special bridge funding might be used to cover the cost of this expense until the reliance on portables is eliminated. There is also a need to develop a strategy for new school construction to proactively address needs in order to avoid the complex issues that arise from overcrowding. Where there is large-scale development and increasing numbers of families and children, school infrastructure is needed to support them and it must be a consideration from the beginning not an afterthought at the end.

The government needs to increase funding for ongoing maintenance and upgrades to address the needs of aging school facilities—until they are rebuilt—and should employ industry maintenance standards as a guide. Funding for school building maintenance is only 25% of industry standards (Building Owner and Managers Association) and within most school districts aging school buildings are at risk of accelerated deterioration due to insufficient maintenance levels.

Ministry Area Standards

BC is a world leader in innovative curriculum design for 21st century learning, however, the [Ministry Area Standards](#), the official blueprint that sets the physical parameters for educational spaces and learning environments, is based on an outdated model of educational delivery. The current Area Standards document is centred on the classroom as a self-contained unit for whole-group, teacher-driven content delivery. By contrast, 21st century learning requires a range of flexible spaces in and beyond the classroom to support personalized learning, collaboration and experiential, hands-on learning.



The government created the [Ministry Area Standards](#) in 2004. Under this provision, [new schools are on average 30% smaller](#) than those built for previous generations and serving equivalent (or larger) population sizes. Classrooms of 75 square meters that must also accommodate a cloakroom, storage areas, teacher area, and desks for up to 28 students, do not provide adequate space for arts-based learning. Outside the square footage maximums allocated for classrooms, office, resource and gym space, the extra 'design space' allocation based on population size is taken up in hallways and washrooms and sometimes a single multipurpose room used for before/after school care and as a lunch room. There are no specific space allocations in Area Standards for non-enrolling classrooms within elementary schools; these include specialty rooms for the changing needs of the new curriculum including core subjects like music and art.

The current [Area Standards](#) does not allow sufficient space for school facilities that reflect best educational practices or the aspired educational goals of the new curriculum. Investments in new schools should reflect best practices in education research and support the new BC curriculum; there should be guidelines for optimal sizes for student populations that prevent the creation of mega schools in urban centres for purely cost 'efficiencies'. It is imperative that this guiding document be revised as it is the basis for all upgrades and new school builds.

Conclusion

In its 2017 Report, this Committee “emphasized the importance of equity and fairness within the K-12 system in order to ensure that the diverse needs of communities across the province are met, and that all students, including those with special needs, receive a high-quality public education”.

We strongly urge this Committee to once again recommend that the government increase both operational and capital education funding to a level adequate for school districts to meet their mandate to provide quality public education to all learners in safe buildings.

Like the Ministry of Education’s own Policy for [Student Success](#), we believe the province must move to a student-centered approach in the planning and the execution of the funding model. There are challenges that need to be addressed to remove the barriers of equity across the provincial education system.

We applaud the Ministry of Education’s efforts to [revise the funding model](#) to address system inequities. We appreciate the recognition of the overlap of mental health and the view of the whole student. Health, mental health, children and families and education Ministries should be working together for the benefit of the child. This is an unprecedented opportunity to look to and work with other Ministries to fund costs that the Ministry of Education currently bears. Many schools perform services that may fall under the purviews of the ministries of MCFD, RCYBC, Health, and Mental Health and Addictions. By looking for opportunities to use schools as hubs for “wraparound services,” communities will be better served and costs could be borne across ministries.

Budget 2019 needs to fully fund the necessary resources and supports for our most vulnerable learners, seismic and the building of new safe schools, funding that meets true operational costs, and last but not least, address the huge issue of deferred maintenance in older/larger districts.

The BCCPAC Vision statement echoes the views of parents across the province: “Each learner in public education in our province has the opportunity and support to thrive, and reach their full potential, in a diverse learning community of inclusion and equity.”

We ask this committee to consider the BCCPAC’s four key recommendations that are critical for every student to have equitable access to public education with the supports and services they need to thrive and succeed according to the School Act.