

Review of the loading for students with disability 2019–public submission

Anonymous 2

Stakeholder type: Teacher

Jurisdiction: Victoria

# Submission

## Focus Question 1:

There is a disconnect between the amount of money allocated in the levels of adjustments for the NCCD (particularly extensive and substantial) and the actual reality of what that money can pay for, considering the scope of disability and amount of evidence required for each student listed in the NCCD. Both categories require significant documentation of adjustment, and all considered so they should. However, for a child at the extensive level the requirements of evidence basically equate to a Learning Support Officer (LSO) being with the Child 1:1 all of the time, as well as having in class curriculum adjustments, lunch and recess supervision and sometimes after school tutoring or in school therapy. The current loading of $35 350 is far from the amount of money being spent to accommodate the extensive adjustments being provided. Equally, at substantial it is often a student with a language disability, anxiety or autism, who has a diagnosis, is having curriculum adjusted most of the time by teachers, has LSO support as much as the school can provide, as well as likely seeing therapists internally, externally and internal school Wellbeing. The amount of $16 561 in reality is not enough.

The descriptor of extensive states Students with disability and very high support needs are provided with extensive targeted measures and sustained levels of intensive support. These adjustments are highly individualised, comprehensive and ongoing. Adjustments to the regular educational program occur at all times. The reality of an extensive student at the least is that they require a full time LSO. The average wage of an LSO is $55 000. Therefore, at a minimum, schools are having to top up the funding for a full time assistance, or, leave the student without 1:1 assistance they need to attempt to support multiple students with the same staff member. This puts the school at risk of being non-compliant to the Disability Discrimination Act be not being able to give the student at extensive the support that they require, to the level they require it at. For many students who fit the extensive category requirements, in Secondary School, they are not likely to progress towards a VCE pathway and usually head towards VCAL or a non- scored VCE/alternate program ultimately reducing the curriculum adjustments required and thus the overall funding eventually decreases despite the child still needing 1:1 support for non-academic reasons e.g. social or executive functioning. At year 12 students prefer to have 1:1 support in their study time, rather than in classroom support. At VCAL, the Victorian Certificate of Applied Education the requirements change again. It would be preferable to have a Learning Support Officer at the child’s TAFE course to support them there. Certainly the TAFE’s suggest that this is the requirement of the school to provide this. Generally, students with disabilities do follow the VCAL Pathway in which case it often happens that majority of students in the VCAL course do have a diagnosis of some sort. Usually autism, intellectual disability or language disorder. So then in a class of 15 students with all of them in different TAFE courses how does a school ensure each of them has support in their TAFE. It is impossible.

Substantial students are described as needing ‘Substantial adjustments are provided to address the specific nature and significant impact of the student’s disability. These adjustments are designed to address the more significant barriers to their engagement, learning, participation and achievement.’ At substantial, students are not needing support 100% of the time, but are close to it. An LSO wage of $55 000 approximately equates to being responsible for 3.3 students each, so in a 35 period week of lessons each student should technically be getting 10 periods of support. Ten periods of support equates to approximately 30% of the time at school and certainly does not match the Substantial criteria of needing adjustments ‘most’ of the time while at school. The reality of the criteria for students at the substantial level and the amount of money allocated to support them is completely disconnected. If a student is receiving support 30% of the time this technically fits the supplementary category, yet this is the reality of the what funding load at substantial can provide.

Schools are therefore attempting to manage students with substantial and extensive needs by combining students in similar classes, arranging tutoring outside of school hours, withdrawing students in small groups, leaving students in classes without support and in the hands of teachers with multiple children with disabilities. This leaves schools liable under the Disability discrimination act for not providing students with disabilities with enough support to assist them to successfully engage with learning on the same basis as other students. All disabilities vary in degree and a student with a diagnosis might require QDTP support compared to a student with undiagnosed ADHD needing substantial, but the school doesn’t have the evidence of the disability and therefore feels uncomfortable imputing this against the parent’s knowledge and over their own qualifications. The provision of documentation therefore might not match the adjustments being provided due to the accessibility of therapy and diagnostic professionals, as well as the parent’s willingness to accept the idea of the disability. We can input yes, however are we then acting above our qualification level for behavioural disorders of the DSM5?

A major positive of the NCCD is the widening of the categories of disability linked to funding. Previously with only 7 categories of funding it was near impossible to provide any support whatsoever for student outside of these categories such as dyslexia and singular language delays, for example in expressive or receptive language only. These students are now included and this is wonderful. Including them has increased the total financial pool of NCCD money and enabled schools to provide more support to students with disabilities across the whole school. Many of these student do fit the Supplementary level criteria and they do only need support some of the time, however, usually teachers are still making adjustments all of the time. The widening of the criteria and thus bringing in of increased overall funding for schools is the only reason that schools are able to manage to cover the LSO needs of extensive and substantial students. It is not through the funding for each child alone, but instead the overall pool of money that provides the most benefit to enabling schools to support students with disabilities.

Currently in Mildura, the location of my workplace, we have a major shortage of Psychologists. Student at Secondary are being flagged for autism and other behavioural disorders, and if they go through the process of diagnosis and get it, there is then the unfortunate reality of not being any therapists available. The one Clinical Psychologist in the town has a year-long waiting list to see clients. I have a student in year 7 with autism who struggles with stress, self-harms (head bashing) regularly and has emotional outbursts often, and we can’t get him into therapy. Having Therapy accessible through schools, above the level of ‘wellbeing’ which can be a range of qualifications depending on the situation, would alleviate this stress for parents and teachers. Not having access to the therapy means we are sometimes trying to manage the therapy/de-escalation side of the behaviours ourselves, without due qualification or research, and without a pro-active response which would be the preference.

My recommendations to the panel are to widen the range of levels available, to add additional levels and to attached with each of the levels a specific criteria or requirements. There is a huge jump financially between each level, having greater levels and a higher top end, as well as specific required documentation for each of the levels will enable schools to effectively categorise students and link this to the reality of the support required to actually have a student with a disability access and participate in education on the same basis as their peers. For example, if a student is enrolled in year 7 at Extensive, there should be a checklist of documentation presented for them to enable an allocation of money for the employment of a full time LSO for that child to be applied for. A student at extensive, should have access to the full wage of an LSO for their entire schooling. A checklist with criteria, as was the case for past SWD applications would assist schools to ensure they have the evidence they need, rather than guessing and self-doubting what they have and what the true category and level should be. Some students that don’t quite meet substantial criteria in their evidence but are above supplementary should have a middle range category to be listed as.

Another recommendation is to remove the weight from teacher’s shoulders around evidence. Yes, evidence is so important and crucial to holding school accountable for the money they are receiving, but at Secondary School level especially, the workload required for a teacher with 5 or more students with disabilities in their classroom for only 5 periods per week is unbalanced. Most Secondary teachers teach at least 5-7 classes and in each of these classes have 5-15 students with disabilities. The reality of them recording every adjustment they do is impossible. It also impedes their teaching, the best teaching of students with disabilities is natural and global, it is inclusive and flows with goals being set and achieved quickly due to the teacher having time to research and plan, rather than having to research, plan, adjust curriculum, record their evidence, record feedback into personal learning plans, write summaries of achievement and record data and growth. It is impossible to keep up. Once again a checklist e.g. PLP, evidence of diagnosis from and specialist and PSG notes for example would remove the need for a teacher to hold onto planning notes and documents, modified assignments and tests.

Most Secondary Schools have one main person in a role such as my own completing and compiling personal learning plans and evidence, rather than whole staff doing this. This does take the load off teachers, yet the NCCD requires evidence from all teachers and lots of it. It is near impossible for the coordinator if the NCCD submission to collect all the evidence from all teachers, know where it is and have it in an easily accessible location especially emails to parents or teacher planner notes. The loadings therefore for each child need to be at a level where they enable teachers to use LSO staff to assist in the recording of documentation and have planning time too. Especially for teachers with multiple children in their classrooms. The checklist of required evidence for each child also would reduce the load in this case too.

Another difficulty with the current model of loadings of the three levels is the ridiculous nature of the timing of the count. August to August makes sense in the idea that schools at that point have some evidence of disability, have provided adjustments and have documentation from parents. However, the idea that at a Secondary school the amount of funding gained by the Year 12 cohort is equivalent to the incoming year 7 cohort is absurd. In my school in 2018 I had 7 students in year 12 with disabilities, most at supplementary, due their maturity and independence. The incoming year 7 cohort in 2019 had 30 students with disabilities including 4 at extensive. The funding of the year 12 students in no way shape or form could carry the adjustments required at the incoming year level. The last recommendation is to allow schools to make a submission at the start of the year for incoming students, to enable them to alert that there is an imbalance and to seek further funding in this case with evidence.

I hope I have highlighted some key important considerations in regards to the NCCD funding levels. I presume Governments are hoping for the reverse of what I have suggested, that is, they would like to reduce the amounts they are offering, however, my feedback to you is that schools need quite the opposite. Adding more levels in between each category, having a top level extensive category allowing a full time LSO to be funded for students, as well as a formal checklist for schools to clearly ensure they have the evidence they need to justify their applications are some of my main recommendations.

## Focus Question 2:

The Assurance process is obviously important to ensure that schools are being responsible with their applications for money for students with disabilities. The assurance process would be improved through better guidelines for schools around the required evidence for each category and level and by having a recommended program or structure for the recording of the evidence. Another improvement would be to give schools a volunteer option where they can ask for someone to attend the school and have a look at what they are doing with their NCCD and give support and advice in how to improve.

The stress on a school in any audit is high, but one where there is a possibility of losing money already spend is the stress is astronomical for the earning Leader responsible. I am usually confident that the structures and programs I am using to record my NCCD evidence are sufficient, however, every time I visit another school and see what they are doing I do question if what I am doing is the ‘right’ way. I am yet to go through the assurance process, but in some ways I would like to, so I know if what I am doing is right and good enough or not. I would like to know where my gaps are and where I could improve. I would like to be able to access assistance to help me to improve.

Effective and simple programs to support teachers to record evidence would also be helpful. Consistency across schools is impossibly currently, some schools using compass, some using SIMON, google documents etc. One program that linked to school data management systems that collected information such as report grades, adjustments made by teachers, growth data on PAT, NAPLAN and AIM on Demand assessments, notes on assessments and diagnosis would be very helpful. Many schools are using multiple platforms to manage all the information required, it would be nice to just have the one place. One central place is what is recommended in the NCCD guidelines, however the reality of that is difficult to produce without lots of hours spent manually putting data and information into files and google docs.

The most important improvement is that schools need a points checklist for each category and level to be able to effectively reduce stress levels of schools undergoing not only the quality assurance process, but generally the NCCD process. For each level, recommendations of the required documentation would be very helpful. Perhaps by a points system such as the one Price Water House Cooper seem to be working from, but more so just a checklist that gives schools solid structure and guidance. An example being for students at substantial they might be required to have a personal learning plan - showing goals, showing substantial adjustments that they are monitored and evaluated preferably signed, a diagnosis and, notes from parent discussion could be enough? At supplementary is it enough to have a short form PLP, notes on the student’s online profile, parent teacher interview or phone conversation notes and teacher record of adjustments on reports – is that enough? How do we know without a checklist?

For students where a disability is being imputed – a checklist or requirement of a school statement justifying why they have imputed, what data have they used, how have they made this decision would be helpful. What adjustments are they making, what assessment have they done? And offer some possibilities for assessments – an anxiety checklist for wellbeing staff, a language disorder or dyscalculia screener for those students. Upskill school leaders to be able to run these assessments in schools themselves so the collection of diagnostic evidence is improved. The reality of sending students to have assessments in the country areas such as Mildura, is that there is a 6-12 month wait for student being assessed with autism and even then it is very difficult to do this. Parents don’t bother, and then it is left with schools imputing something they are sure exists but that they can’t technically diagnose. Autism being one of these disabilities requiring a multidisciplinary team, somewhat near impossible to have done in a quick timeframe. Funding or connecting schools to have increased access to therapists – psychologists, occupational therapist and speech therapists and qualified practitioners to complete assessments and make recommendations would also assist in the clarification of imputing disabilities for some students.

Schools are generally fearful of the assurance process so reducing this stress through having clearer checklists and guidelines, offering support through therapists and upskilling Leaders to make reasonable decisions around imputing of disabilities where the diagnostic process is time consuming, expensive or difficult for reasons such as availability of resources. Allowing schools to have to opportunity to sit with an assurance officer to show them how and what they are doing and check for gaps and improved processes would also take the pressure off. Lastly consistency in the requirements for storage and organisation of information such as a set program or template or suggested method would assist schools to ensure they information being requested is easily accessible and in the format advised.