

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

Queensland Catholic Education Commission

Stakeholder type: Peak Body

Jurisdiction: Queensland

Summary

The Queensland Catholic Education Commission (QCEC) agrees in principle with the needs-based funding methodology of the Education Act. However, as the Schooling Resource Standard for non-government schools during the current transition arrangements is discounted by a school's capacity to contribute, not all students receive the same level of funding. While this submission relates exclusively to the disability loading, QCEC believes a more fulsome review of all loadings should be considered.

QCEC believes that the funding received under the disability loading is inadequate to cover all costs associated with the education of students with disability and does not reflect that the administrative requirements for all levels of adjustment are similar.

It is important to recognise that school location and size impact on the costs of adjustments provided. In Queensland, many Catholic School Authorities have schools in rural and remote areas. For these schools, travel and availability significantly increase the costs of accessing specialised support services and resources.

QCEC notes that the nature of adjustments required at different stages of education are significantly different but that the overall cost of providing those adjustments is not dissimilar and that the primary and secondary loadings need to be equal.

Costs relating to professional development for teachers and support staff should be factored into the loadings. School administration costs for moderation and costs of specialised equipment and resources are further important considerations.

With respect to the Australian Government assurance processes, QCEC suggests further guidance on moderation is required and that auditors should be supported by educational consultants with recent experience working with students with disability.

Submission

Questions

QCEC welcomes the opportunity to provide this submission to the National School Resourcing Board's review of the loading for students with disability.

QCEC is the peak strategic body with state-wide responsibilities for Catholic schooling in Queensland. This submission is provided on behalf of the five Diocesan Catholic school authorities and 17 Religious Institutes and other incorporated bodies which, between them, operate a total of 306 Catholic schools that educate around 147,000 students in Queensland.

In 2018, Queensland Catholic schools educated 21,254 students with a disability (identified under Nationally Consistent Collection of Data on School Students with Disability). Below is the breakdown of those students by level of adjustment and type of disability:

Level of Adjustment:

Support within QDTP 28% | Supplementary 53% | Substantial 18% | Extensive 1%

Type of Disability:

Cognitive 53% | Social Emotional 31% | Physical 10% | Sensory 6%

Catholic schools have a strong commitment to inclusive education and ensuring that all students, regardless of their abilities, have the opportunity to attend and engage in Catholic schools.

QCEC is the approved system authority which distributes Australian Government recurrent funding on behalf of all Catholic School Authorities (CSAs) in Queensland pursuant to section 78(6) of the Act. Each of the five diocesan authorities has developed their own funding distribution methodology in accordance with needs-based funding arrangements under sections 78(4) and 78(5) of the Act.

QCEC agrees in principle with the needs-based funding methodology of the Education Act. However, as the Schooling Resource Standard (SRS) for non-government schools during the current transition arrangements is discounted by a school's capacity to contribute, not all students receive the same level of funding even if they face the same disability. While this submission relates exclusively to the disability loading, QCEC believes a more fulsome review of all loadings, including their inter-relationships and relativities, should be considered.

QCEC has consulted widely with CSAs in Queensland to inform this submission and to provide responses to each of the focus questions raised in the Board's consultation paper.

Is the funding provided under the loadings appropriate?

QCEC believes that the funding received under the disability loading is inadequate to cover all costs associated with providing support to students with disability that will allow them to have the same opportunities and choices as students without disability.

Total support includes a range of services and other provisions including staffing in schools, centrally funded specialist staff, infrastructure (e.g. databases) and building services in providing the appropriate access and other physical requirements under the Disability Discrimination Act (1992). To ensure students requiring support are not disadvantaged by funding shortfalls, every effort is made at the school, sector and Diocesan level to meet these costs.

How does the level of resources required to support a student at each level of adjustment differ?

The level of resources required to support a student at each level of adjustment differs enormously. The two lowest levels of adjustment, Quality Differentiated Teaching Practice (QDTP) and Supplementary adjustments, typically require less intense educational supports than the top two levels of adjustment. Each level of adjustment is equally as important, however, QDTP level adjustments are not funded despite requiring active monitoring and tracking. Moreover, the administrative requirements and teacher planning, while different, necessitate approximately equal time for all adjustment levels. There can also be a significant difference in planning and support for particular categories of disability within adjustment levels. For example, students with extensive educational adjustments have recognised complex needs requiring intensive supports, however in the physical category these can be more predictable (i.e. assistive technologies, augmentative communication, personal care support) than for students in the social emotional category (i.e regular behaviour support/intervention, daily modifications to supports for student welfare/wellbeing).

Substantial and Extensive adjustments require diverse and complex resourcing including specialist teacher, guidance counsellor, occupational therapist, speech-language pathologist and/or other external staff, resources, planning and organising, and often capital works. Extensive adjustments are highly individualised, comprehensive and ongoing. They can involve an investment in specialised technologies and specialised facilities. Students at this level have complex needs involving personal care and/or complex medical conditions.

The table [sic] below provides an example of the resources required to support a student at each level of adjustment.

QDTP - Active monitoring which requires teacher time and planning of educational adjustments as well as recording the impact of these adjustments

Supplementary - Adapted and additional instruction in some or many learning areas or specific activities.

Additional administration time for the teacher to co-plan teaching with the support teacher and other specialists.

Substantial - Additional support or individualised instruction in a highly structured manner, including adjustments to most courses, curriculum areas, activities and assessments and provision of specialist advice on a regular basis.

Schools need to provide additional specialist teacher time, not just teacher assistant time, so the hourly rate is significantly higher. Often these students also require specialist equipment, particularly students with hearing, vision or physical impairments.

Extensive - Intensive, individualised instruction or support in a highly structured or specialized manner for all courses and curricula, activities and assessment.

Often students at this level require more than one person working with them. Specialist teachers typically require support for advice and additional time with the learning support teachers.

Often specialized equipment is required. Sometimes it is a one-off purchase but at other times items need to be upgraded as students grow and technology advances.

If the student relies on an Auslan Educational Interpreter (EI), costs include:

- EI for access to the curriculum including extra curricula activities (minimum 25hrs/week)
- continued training and upskilling of the EI
- professional development for class teachers (e.g. working with EI)

Does school setting or context impact on the costs of adjustments provided?

CSAs in Queensland have indicated that school location, size and type have a significant impact on the costs of adjustments provided.

In Queensland, many CSAs have schools in rural and remote areas. For these schools, the costs of accessing specialist support services and resources are higher than for schools in urban areas due to significant travel costs. This situation is often further compounded by the lack of availability of these professionals to provide such services.

Schools are using funding as efficiently as possible, however, smaller schools have less capacity to reallocate other funds than larger schools. For example, a small school is more sensitive to increasing enrolment of students with disability and/or movement of existing students to a higher level of educational support. This highlights the importance of school system support and analysis of the most effective distribution of available resources.

Small schools in lower socio-economic areas with a high number of Aboriginal and Torres Strait Islander students can experience relatively high numbers of students with disability or students with multiple disabilities. This complexity has an additional impact on small schools.

Boarding schools with students with disability face the additional challenge of providing support to the student outside regular school hours. The costs associated with providing this support are not incorporated in the current funding arrangements. In addition, the intersection between NDIS and NCCD remains unclear and funding gaps are apparent.

Additionally, consideration should be given to funding students with disability seeking asylum who are being supported in schools.

Does the stage of education impact the cost of adjustments needed; for example, in the early years and transitioning to secondary education?

QCEC notes that the nature of adjustments required at different stages of education are significantly different but that the overall cost of providing those adjustments is not dissimilar. Consequently, we argue that the differential currently provided in the primary and secondary NCCD loadings needs to be removed such that funding rates for each NCCD level of adjustment for primary and secondary students is equal.

For any student, the frequency and intensity of early intervention is resource-intensive regardless of the educational juncture. Early intervention is more likely to occur in the early years of schooling. However, some would argue that support is more intense in the Middle Years of schooling (Years 7-10) when students are completing a wide variety of subjects under the Australian curriculum than when students can begin to specialise into more individualised pathways in the Senior Years.

Transitioning to a new year level or educational juncture (i.e. to prep or secondary) can be challenging and extensive resources are required to make the transition a success. However, transitioning into secondary has specific circumstances that requires substantial planning and support, e.g. increased student movement to classrooms and managing a more complex learning environment. Consideration should be given to additional funding for students at the two key transition periods of entry to primary school and entry to secondary school.

What costs of supporting students with disability (for example, fixed system costs, costs of collection, assurance and management of the NCCD at a school level) should be factored into the loadings?

For all levels of adjustment (even QDTP), there is the requirement for individual planning, documentation, storage, meeting and moderation. While these tasks are essential for students with disability to access learning, they bring with them significant costs.

QCEC recommends the following elements should be recognised as part of the costs of providing support to NCCD:

- Professional development for teachers and other support staff to build capacity around the implementation of evidence informed educational adjustments for students with disability. This includes professional development to build teachers' confidence and competence in designing differentiated curriculum programs.
- School costs associated with the implementation of teacher judgement activities as outlined in the NCCD within school and across school moderation processes.
- Costs of providing specialised equipment and resources can be extremely expensive in relation to providing inclusive environments in mainstream schools, especially in established schools that were not built for individual needs – ramping, toilet and change facilities, lifts, Braille equipment, visual aids and specialist staff (e.g. Auslan interpreter).

Are there any other factors that impact on the level of resources required to provide adjustments?

The level of training required for teacher assistants and specialist staff, i.e. allied health professionals, also impacts on the level of resources required to provide adjustments.

Are Australian Government assurance processes, undertaken to support the accuracy of information provided to calculate a school's Australian Government funding entitlement relating to students with disability, appropriate and sufficiently robust and how might they be effectively improved?

QCEC supports the introduction of moderation, both at school level and across sectors. To ensure these processes become sufficiently robust, ongoing facilitation and guidance, and appropriate funding, for school level moderation is necessary.

QCEC also supports the need for audits and acknowledges that while NCCD processes have matured significantly over the years, they are still very time consuming.

QCEC notes its concern with post NCCD audits and quality assurance processes being conducted by accountants and other professionals who have not necessarily received specific training in the area of inclusive education/special education. There is, therefore, a risk that auditors do not fully understand the subtle connections between disability, functional impact and reasonable adjustments. Auditors may also have limited knowledge of the structures of schools, which could give an inaccurate picture of what is possible or reasonable in these contexts.

The auditing process would be enhanced by employing educational consultants, with recent experience working with students with disability, to accompany the auditors to assist by discerning the evidence they are examining. Alternatively, specialised training could be provided to auditors to improve the consistency of the process and the value of the feedback to schools.

QCEC also notes that audit processes appear to be inconsistent across the sector, with some schools having all their students' evidence reviewed while other schools only have selective evidence reviewed.

Additional comments:

Further to the points raised in this submission, clarification on how NDIS and NCCD interact to allow schools to maximise all available options within the respective guidelines to support students with disability is required.

Conclusion:

In conclusion, QCEC supports the Government's needs-based funding formula, but advocates that all loadings should be reviewed as a package rather than individually. With regard to the disability loading, it is important that the loading takes into account all costs associated with minimising barriers to learning and supporting students with disability.

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