

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

Victorian Ecumenical System of Schools

Stakeholder type: Approved authority/School

Jurisdiction: Victoria

Summary

- 1 The additional funding being provided for students with disabilities is greatly appreciated.
- 2 Nevertheless, when all direct and indirect costs are tallied, schools spend significantly more supporting students with disability than is funded.
- 3 Any new funding system should allow schools some discretion in expenditure to produce the best possible outcomes for all students with disability.
- 4 Simplification of administration should be a priority, especially in view of the demands made upon small schools.
- 5 The adjustment level of Within Quality Differentiated Teaching Practice requires that schools service the particular needs of these students without funding support.
- 6 The cost of adjustments varies across the years of education, in different ways for the different levels of adjustment.
- 7 Auditing of the NCCD should be undertaken by professionals experienced in the disability education field.
- 8 If there were a way of linking funding to outcomes, rather than just inputs, there would be better outcomes for students with disability.

Submission

Questions

Is the funding provided under the loadings for the top three NCCD levels of adjustment appropriate to support students with disability to access and participate in education on the same basis as other students?

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

- i. The adjustment level of Within Quality Differentiated Teaching Practice (QDTP) requires significant planning, record keeping and reviewing by teachers and learning support leaders as well as teacher/parent/student meetings with follow up to monitor effectiveness. The same consultation and documentation requirements apply to these students as to students at the Supplementary level, yet there is no funding applicable to the QDTP level of disability.
- ii. In the Primary years - Supplementary usually means that the student is withdrawn by Learning Enhancement staff for the “personalised and explicit instruction” required, and has dedicated “support or close supervision”. Learning Enhancement staff then write reports and often individual education plans and attend parent meetings etc. The \$4,764 funding does not cover this commitment of staff time and expertise.
- iii. The biggest difference in the level of resourcing required at each level is the staffing. Students receiving Extensive adjustment require a high level of staffing support for small group interventions, assessment provisions, program/curriculum adjustments, case management through Student Support Group meetings and liaison with allied health etc. Staffing is the biggest cost in most cases. Further to this, students with Substantial and Extensive adjustments often require the highest level of assistive technologies in order to access the curriculum. These technologies and programs are specialised and usually costly.

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

- i. Schools with large campuses and large distances between facilities may have extra staffing requirements. For example, a walk to sport facilities requires teacher assistant support for vision impaired or behavioural needs students.
- ii. Some schools, often larger schools, have one or more highly trained Special Education teachers who have a deep understanding of disability and how to meet the needs of these students. Not all schools have this level of expertise, and staff without this expertise may find it difficult to interpret the different requirements of the NCCD. These schools will need to invest more time in gaining control of this area, and with this comes a cost. In small schools this administration may fall to the Principal.
- iii. Particularly with smaller and regional schools in mind, given the burden of the tsunami of compliance requirements in recent years, it is important to keep administration of this funding element as simple and streamlined as possible.

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

- i. In the early Primary years, there is a focus on early intervention. For students with disabilities, this means enhanced staff support needs in these years (providing intervention programs, liaising with allied health, offering behavioural support etc).
- ii. Transitioning to Secondary schooling can be a particularly challenging process for students with disabilities. This requires staffing for Learning Enhancement support classes, the gathering of student information to disseminate to secondary teaching staff, and meetings at which Learning Enhancement staff communicate needs to secondary counterparts.
- iii. Similarly, supporting students' transition from Secondary schooling to appropriate settings in the world of work or further study can involve inordinate commitment of staff resources.
- iv. In the secondary years, Supplementary and Substantial adjustments in the classroom context can often be managed through assistive technology (voice-to-text, electronic readers, audiobooks etc) as the students are capable of learning to use these supports. This can reduce the cost of supporting these students. Students in primary and secondary that receive Extensive adjustment usually require significant time with teaching and non-teaching staff in a one-on-one or small group setting, thus meaning that the costs of adjustments remain the same at all stages.

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

- i. Costs of employing skilled staff to provide appropriate support and intervention – teacher assistants, Special Education staff, school counsellors, school nurses.
- ii. Cost of materials and resources to provide the necessary adjustments, particularly for physical disabilities.
- iii. Cost of IT staff, management staff and Special Education staff who moderate, check data and complete the NCCD process.
- iv. Cost of replacement staff to cover lessons of special education teachers for administration duties.
- v. Cost of professional development required for staff to access relevant initial training and keep up with continuous updates to NCCD, and replacement staff costs for the same activities.
- vi. Cost of IT software for meeting the Government requirements such as NCCD.
- vii. Cost of evidence-based teaching materials to remediate Learning Disabilities, Assistive software.
- viii. Cost of staff time to collate and evaluate evidence and meet to satisfy the requirements of NCCD.

- ix. There should also be some scope for “smoothing” to be factored into the funding calculations. The new arrangements under NCCD mean that disability funding can vary substantially from year to year, and the adjustment for the numbers of students with disabilities is made after Census, meaning that schools can have significant reductions in funding that are factored into the last Commonwealth payment for the year (ie, very late in the year for that year). Schools will have been supporting students on the basis of the previous year’s funding for half of the year prior to the reference date.

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

- i. The Disability Discrimination Act requires schools to meet the needs of students with disability, but the funding is not adequate for schools to do this properly.
- ii. Combined Federal and State Funding does not cover the cost of teacher assistants, Special Education trained staff, IT staff and other necessary staffing, nor of supplying the materials required by students. Schools do the best they can, often sharing resources amongst students in all categories of disability, to provide the best possible outcomes for all individual students.

For example, when a student qualifying for Extensive support is absent from school, a teacher assistant can help other students, or assist with administration tasks supporting students with disability. The best judgements about allocation of resources can be made at the school level, and it is important that schools retain this flexibility.

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?

- a) A recent audit at one VESS school was thought to be sufficiently robust. However, it relied upon the school to devise a data gathering system. This relied heavily on Special Education staff and IT staff. For the data collection to be ‘consistent’ it would be valuable for there to be a system for all schools to use. This would streamline the job of the auditors and provide a clear process for schools to follow in terms of identifying students and evidence required.
- b) The assistance of staff from Independent Schools Victoria has helped many Victorian independent schools become conversant with the NCCD. As with many things, however, it is not as easy for regional schools to access in-person support.
- c) The contractors employed to conduct the post-enumeration audit into NCCD data need to be experienced in education and/or disability services and feedback from schools suggests that this is not always the case.
- d) One suggestion from an experienced professional has been that the required evidence/documentation for the NCCD needs to be focused on demonstrating student outcomes (behavioural, academic, social etc) in order to determine effectiveness of funding monies. This would also ensure that school programs focus on student outcomes, rather than being designed to ensure they’re meeting NCCD criteria. Currently, it seems that many schools are becoming NCCD compliant, rather than student-outcome focused. If the funding model could align with the need for student-focused support, this may help to ensure that schools are gaining optimum outcomes for students with disability.