

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

South Australia Department for Education

Stakeholder type: Government

Jurisdiction: South Australia

Summary

- 1 The price for the loadings for students requiring substantial and extensive levels of adjustment are significantly lower than the average expenditure required by system funding authorities to support these students.
- 2 The cost of supporting students with disability should be assessed on an avoidable cost basis. What costs would a system funding authority avoid if no students had disabilities requiring adjustment? This would include a large range of direct and indirect costs; including many that would not have been captured in the survey of schools used to inform the prices when the loadings were originally determined.
- 3 The variance in costs within each level of adjustment, particularly at the extensive level, requires review.

Submission

Focus question 1

Is the funding provided under the loadings for the top three Nationally Consistent Collection of Data on School Students with Disability (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?

The department's service model for supporting students with a disability is multi-faceted. It involves population based funding to schools, special schools/classes/units, state-wide services as well as supplementary funding where an assessment of a child's needs are not able to be met from the more general funding and services that are available for these students. Whilst this expenditure includes direct and indirect costs it does not include per capita/ base funding¹ provided to schools.

The department has assessed its total expenditure on its service model including direct and indirect costs, which highlights that its total cost structure exceeds revenue. Due to the multifaceted service model, allocation to the NCCD levels would necessarily be arbitrary and could lead to misinterpretation. On this basis the department is not a position to provide meaningful unit pricing.

A national approach to funding prices does not mean that states/territories do not use more granular allocation/expenditure models for students and schools, which will depend on local service delivery models. The price structure in the *Australian Education Act 2013* is appropriate for the purpose of funding allocation. It remains a matter for states and territories to determine expenditure allocation models and decisions, under the national model. It is important that the national funding methodology recognises that not all jurisdictional expenditure is student-centric or easily attributed to a per-student amount.

¹ Base Funding is provided for core leadership, teaching and ancillary staffing (for example, School Service Officers and groundskeepers)

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

Yes, the cost of a child/student's level of adjustment can differ depending on access and engagement in a school setting, school size and or geographical location. Attraction and retention of quality teachers and support staff as well as access to discipline-specific specialist support staff are also contextual considerations factored into the cost of adjustments provided. Other factors such as whether schools have embedded whole of school approaches to inclusion (i.e. planning, teaching, curriculum, assessment and reporting, environment, resourcing such as equipment, technology, visiting teacher/discipline specific support, communication devices or materials), further inform the indirect and direct costs/services allocated.

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

- 1 The cost of adjustment for different stages of education can vary for individual children. The cost of supporting a student in a secondary setting can be much greater than in a primary setting depending on the type of disability and the nature of the adjustments required to meet the student's functional needs. For example, a student with a vision impairment will require significantly higher resourcing in their secondary years due to accessing different subject areas and teachers, where curriculum content needs to be translated into Braille. In addition, secondary students who require transfer and positioning, mobility or support for personal care may also require a higher level of adjustment due to both their physical size or as a result of increased internalising/externalising behaviours (frequency, duration and intensity) associated with their disability. The cost impact is already taken into account by the difference in prevalence of support in secondary years compared to primary years. In other words, the higher prevalence of support in the primary years is not a rationale for reducing the price for secondary students.

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?

In answering this question it is relevant to define 'applicable cost'. The department has defined 'applicable cost' as per **the concept of avoidable cost. Avoidable cost** is the net amount of expenditure that would be avoided if no students had a disability. This approach recognises the different settings that would be in place in each sector and recognises the differences in policy approaches. The nature of the adjustments funded in all school settings include expenditures on teachers, assistant teachers, professional development, professional support, class resources, technology and equipment, and system wide supports.

Without proposing a methodology, this submission notes the range of categories of cost in supporting students with a disability that may need to be considered. In South Australia's public system, these are:

- 1 **System Over-Heads:** Much of the overhead costs of running a public education system will not change if no students had disabilities. However, if no student had a disability the system would not incur costs for disability policy, program development, and specific data measurement. These costs are typically attributed to central managerial staff responsible for disability policy and programs, as well as expenditures on specific system-wide professional development in areas such as differentiation, autism, behaviour support, trauma informed practice and new approaches to working with children on the autism spectrum. State and territory education departments will typically provide state-wide professional development opportunities and training, resource centres/libraries and outreach services that are accessed by teachers and parents of students with disability in government and non-government schools. These are also avoidable costs that can be directly attributable to students with disability.
- 2 **Specialist Expert Staff:** Costs of providing expert assessment of students with disability by special educators, educational psychologists, speech therapists, behaviour coaches and other expert staff, often located in education offices across a state or territory and delivered as state-wide services. These staff will work with teachers providing specific advice on how to identify functional need, identify the skill building and types of adjustments that are required to meet the student's needs and develop personalised plans to reflect the above, articulating type, frequency, duration and intensity of supports provided.

The department also funds not for profit agencies to provide professional development and other direct support related to students with disabilities to teachers in the government, catholic and independent sectors.

- 3 **Behaviour and other specialist Learning Centres:** The department provides a number of centres that take students usually for short periods of time to provide intense support related to behavioural issues. The department continues to fund the student's home school at the same level while the student attends the specialist learning centre.
- 4 **Costs of transporting students with disability to attend special option settings that are not their closest available education option.** The department pays for the transport of these students, to and from school. There is an additional cost, borne by sites where transport to and from specific curriculum offerings is provided (i.e. lessons outside of school such as swimming, shopping centres or post school option pathway settings for life skills development).
- 5 **Personal Care:** The department is an in-kind provider of the personal care needs of students with disability.
- 6 **In-School Costs - Costs of Providing Special Schools and Units:** The department's service model for students with a disability includes providing special schools and units. There are fixed costs of providing these typically very small special schools that cater solely for students with disabilities. These schools will have maximum class sizes ranging from 4 students (with sensory impairment) to 8 students depending on the nature of their disability. The total cost of these schools would be avoided if the students did not have a disability. Those students would instead be located in their nearest mainstream school. For this reason, the total costs of these schools would be offset by the cost that would otherwise be incurred if those students were taught in mainstream schools with no disability support. The costs of providing special schools includes all staffing and other operating costs and repairs and maintenance.
- 7 In South Australia there is an inclusive education practice of locating special units within mainstream school grounds. The costs of many special units is the same and sometimes more than the costs of operating a stand-alone special school. These are also avoidable costs that can be directly attributable to students with disability.
- 8 **In School Costs – Special Classes:** In South Australia many government schools have a special class also funded for a maximum class size of 12 students or less. These classes support inclusive education practice in locations where there are not enough students with disabilities to justify provision of a special unit or school. The cost of special classes would be avoided if these students did not have disabilities and this avoided cost would be offset by the cost of including those students in mainstream classes.
- 9 **Top-Up Funding for Students in Special Schools, Units and Classes:** Currently, a proportion of students in special schools, special units, and special classes require extra support in addition to that described above, which is provided based on an assessment of individual students.
- 10 **In School Costs – Fixed Costs of Mainstream Schools:** The majority of mainstream schools have a leadership position responsible for supporting students with special needs including those with disability. Schools are responsible for ensuring sufficient staff have professional development in trauma informed practice and interception for example. The cost of relief teachers to enable such training to occur is a specific cost for most schools.
- 11 **In School Costs – Mainstream Classes:** the vast majority of students with disability are taught in mainstream classes alongside students without disabilities in South Australian government schools. In 2019, the department of Education launched its Inclusive Education Support Program (IESP) which provides supplementation funding based on the functional needs of students with disability. The funding is provided via the following mechanisms:
 - **Category 1-9 Additional Supplementation Support.** Prior to 2019 the department allocated supplementation funds from a range of mechanisms depending on the nature of a student's disability. In 2019, the department consolidated supplementation funds into a single funding mechanism based on functional needs of students. These 9 supplementary prices align with the criteria for the three funded categories of the NCCD. In effect the prices are low, medium and high subcategories within each of supplementary, substantial and extensive categories. The funding is available following application and assessment and is provided where consideration of all other funding described herein

is insufficient to meet the needs of the child. Assessment includes a review date that varies for each individual student and depends on documentation of the interventions and supports for each child in their personalised plan (i.e. One Plan²). A detailed overview of the changes to the department's disability funding model is provided at Attachment A.

- **Inclusive Education Support Program (IESP) Grant Funding:** This is a population-based grant provided to mainstream schools only, based on their total number of enrolments weighted for the socio-economic status of each community. It provides additional support for students in the bottom end of the supplementary category of NCCD.
- **Transition Funding:** As the new policy is being implemented, some transition funding is being provided.
- **Top-Up Funding for Students in Mainstream Classes:** where a student is assessed as requiring adjustments that cost more than the highest level of supplementation (i.e. category 9), they receive category 9 funding and additional amount based on need.

In addition schools have access to **Literacy and Numeracy First** funding which is provided to students identified as not meeting the standard of education achievement in years 2, 4 and 6 based on running records and NAPLAN data from the previous year. These students include a large proportion of students with intellectual impairment and global developmental delay.

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

Yes

- The educational setting: In South Australia there are a large number of special units, which are in effect standalone schools co-located on the same grounds as primary or high schools. There are also a large number of special classes located within primary schools and a majority of students located in mainstream classes. Having special units co-located on the same grounds as other schools and under the management of a single Principal means that South Australia is not entitled to receive base grant funding. In other jurisdictions these special units would be funded as special schools and would receive base grant funding.
- With South Australia's inclusive approach; there are higher costs as there are relatively more students requiring relatively more support to be able to learn in a mainstream setting. A special school has specially trained teachers and have a School Services Officer (SSO) in each class. When one high-needs student is taught in a mainstream class the additional SSO is often required to support only one student. South Australia's approach of inclusive education means that the capability of teachers supporting students with disability can vary, particularly in mainstream schools where high-needs students are enrolled. This can result in those schools being provided additional para-professional resources to assist the teacher to a much greater degree than what would be required if the student were taught in a special school, by specially qualified teachers.

Focus question 2

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? How might they be effectively improved?

The department utilises the Australian Government funding formula and Funding Estimator Tool (FET) to all allocate all state funding to non-government schools. This means that significant funding is also provided to non-government schools in South Australia based on the NCCD.

² The One Child **One Plan** used by the department is a single learning plan for students with verified disability, children and young people from Aboriginal and Torres Strait Islander descent and under the Guardianship of the Minister.

While the department recognises that the Australian Government does undertake post-enumeration processes to verify the accuracy of data provided by non-government schools for school funding purposes, including NCCD figures, it has no visibility of the information provided by the non-government sector or the assurance processes employed by the Commonwealth.

To improve the assurance processes and robustness of the NCCD, the department hopes greater information sharing and collaboration by the Commonwealth will enable it to undertake the requisite analysis of NCCD for non-government schools prior to state grant funding payments being made.

Attachment A

Overview of changes to departmental funding model for Students with Disability in SA public schools.

- Prior to the NCCD method of classifying students was introduced, the department funded students as follows:
- Special Education Learning Difficulties Grant – provided additional funding to schools to implement programs to improve learning outcomes for students with poor reading and vocabulary skills for their age. This funding was allocated using a combination of factors including Low Socio-Education Status to distribute a proportion for funds to all schools (excluding special options) for students with learning difficulties.
- Specific student funding provided as additional supplementation
 - Mainstream A – Students requiring additional level of support.
 - Mainstream D – Students requiring direct support.
 - Mainstream I – Student requiring an intensive level of support similar to special options.
 - High Sustained – additional support for students with significant sensory impairment.
 - Very High Sustained – additional support for students with server multiple disabilities.
 - Challenging Behaviours – additional support for students with disability with behaviour issues.
 - Special Options – Special Schools/Units and Classes provide lower class sizes to facilitate more individual support for students with significant disabilities.
 - Behaviour Supplementary Funding – Funding for students with behaviour management issues.
 - Discretionary Funding – Short term funding to support students while assessed.
 - RAAP – targeted individual funding for students with disability where the student’s needs are not met through current formula allocations.
- With the introduction of the NCCD, the department’s model of allocating supplementation was reviewed and aligned to the NCCD.
- The department has since developed a supplementary price that aligns to the definitions of the NCCD. Not all students classified pursuant to NCCD as levels Quality Differentiated Teaching Practice (QDTP), or levels 1, 2, or 3 require supplementary funding above base levels of expenditure and funding already provided by the department. The 9 categories all link to specific interventions or adjustments for individual students which are documented in each student’s One Plan.
- In addition there is a population-based grant to enable schools to meet the needs of students requiring very minor adjustments without the need for an application and assessment.
- .For students requiring more than extensive adjustments there is a separate process where these students are funded based on their total needs. These students are categorised as 9+.
- For every dollar spend directly on students with disability through the funding formula there is an additional cost incurred by the department on state-wide support for these students including a workforce of approximately 500 para-health professionals and special educators.
- The department continues to fund students in special schools, special units and special classes outside of the mainstream funding model based on much smaller class sizes.