

Australian Primary Principals Association submission to the Review of the loading for students with disability (September 2019)

OPENING REMARKS

This submission sets out the response of the Australian Primary Principals Association (APPA) to the National School Resourcing Board's review of the loading for students with disability. APPA represents over 7,200 Government, Catholic and Independent primary school principals in all states and territories.

The Inquiry is taking place in the context of schools experiencing an increasing number of students with disability and other challenging learning needs. It is well documented that, with a higher incidence of children with serious medical conditions in the population at large, there is a greater likelihood of these children being in primary classrooms than twenty years ago.

APPA is also aware the current Nationally Consistent Collection of Data (NCCD) collection process for students with disability will indicate the incidence of students with disability and challenging learning needs continues to rise.

The 'on the ground' reality in schools is that, without finding the extra support from 'regular' funding, schools would be unable to provide the expected level of assistance to ensure students with disability receive a quality education.

APPA believes loading levels should be fully reviewed and makes the following points:

1. The current loading model does not guarantee the capacity for schools to educate students with substantial and extensive adjustments. The general response from principals is that there are inadequate levels of funding to support the personnel and physical resources required to meet the needs of students requiring higher levels of adjustment.
2. There is an expanding group of students with serious non-medically diagnosed conditions. While recognising the role of the teacher in responding to specific learning difficulties and managing the classroom, a growing incidence of extreme and disruptive behaviours often requires specialist intervention.
3. Primary schools are increasingly required to manage access to allied health services supporting the enrolment of students with disability with, for example, individual therapy programs.
4. The coordination and management of support for students with disability is often intensive and includes, for example, meeting workplace safety policy requirements, facility modification and staff training (which can be well beyond the classroom teacher of the individual student). Supplementary funding beyond that currently provided is often required to meet the actual needs of individual students.

THE LOADING FOR STUDENTS WITH DISABILITY

While there is a growing number of students with special learning needs there is also an increasing expectation that their education will be delivered in an inclusive mainstream setting. Primary schools have long been enrolling children with disabilities in mainstream classrooms and managing their active participation. Wherever possible, schools establish the highly individualised and specialised learning programs so necessary for successful inclusion. What should be recognised is the current success of these students is often the product of teacher and principal goodwill and commitment, a resource that is being stretched under the tension of limited resourcing, growing demand, increased expectations, and greatly increasing compliance and accountability.

It is important to understand the position of a primary teacher with a class including one or more students with disability and other students with undiagnosed needs but for whom no additional funding is available. In this situation, despite the best efforts of committed teachers, the education outcomes of all children is jeopardised.

In the case of children with emotional or mental health problems, sustained intervention is required early in schooling. Sadly, access to specialised support can be very limited. Despite good intentions, a school may only be able to provide very limited interventions and therefore unable to provide the educational access and participation on the same basis as other students.

FOCUS 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?

APPA believes the funding available to provide a high-quality education to students with disability in a mainstream classroom setting is insufficient. The reality is teachers are often without the resources and personnel assistance required to provide fully for children with disabilities. Consequently, schools have to find the extra support within their regular funding in order to supplement the provided allocation.

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

Principals report that the small amount available for funding support is quickly consumed in the management and administration of documentation, coordination of meetings (with parents, specialists or system personnel), planning (educational and logistics of support) and provision of resources. One school reported funding an additional .4 (EFT) teacher time for management. This is a school decision but demonstrates the need to ensure classroom teachers, parents and the student have the essential support required to implement the educational program.

Principals also point out that NCCD funding to the school can be reduced due to the system taking a proportion.

Table 1 was provided from one jurisdiction as an example of the options schools have when considering the support structure in schools. It is important to note that children attend school for approximately 30 hours per week though, on average, spend at least five hours a week not in the classroom but in the playground.

Table 1: Funding conversion to teacher aide hours or teacher days

NCCD level and funding per student (If funds came direct to school.)	Support provided if only used for teacher or TA (This is without jurisdiction using funds at system level.)
Supplementary \$4,764	2.3 hours per week TA (or 9 days teacher support)
Substantial \$16,561	8.2 hours per week of TA (or 33 days of teacher support)
Extensive \$35,390	17 hours per week of TA (or 70 days of teacher support)

Note: The unknown figure here is the cost beyond the classroom. This includes the principal's time, senior leaders, supervising staff, office staff, first aid/medical staff and administration costs.

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

The resourcing model does not cover the current rates for employing fulltime a teacher's assistant / aide (ranging from \$35,000 to \$54,000pa depending on jurisdiction). Students with extensive adjustments can need two people at times to manage personal care needs. At \$35,390, the school would need to contribute from general funds to support the student. This is exacerbated where there is a small number of students or the location of students is spread across the school. It is considerably more difficult to manage in small rural or remote schools.

The current loading model does not guarantee the capacity of schools to educate students with substantial and extensive adjustments, especially for students requiring two people due to mobility or personal care need. Schools should be entitled to apply for this additional targeted funding. The general response from principals is that there are inadequate levels of funding to support the human and physical resources required to meet the needs of students with higher levels of adjustment. This sees reduced support and fewer modifications to programs, and students not achieving their full potential. Additionally, increased stress and workload may impact negatively upon a teacher's capacity to work with students with disability. The needs of one child can stretch limited school / class resources in a way that leads to the loss of learning engagement across the whole class.

As one principal pointed out, the descriptors for substantial, e.g. 'frequent teacher directed instruction', 'frequent assistance with mobility and personal hygiene', 'close playground supervision' do not align with the funding amount required to provide the necessary resources.

The prevalence of trauma and neglect may, when connected to students with disability, complicate case management and the capacity of parents and families to participate in the provision of educational opportunities. One school reported the challenge of obtaining parental permission for assessments required in the funding application stage.

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

Students in the early years require a higher rate of funding to support early intervention and transition. The transition from the early education setting to the school setting can be a highly tense and unsettling experience for the student, as well as the parents. Principals reported that the school is not funded until the year of attendance, meaning any costs associated in lead-up work are borne by the receiving school. Kindergarten teachers, lead teachers and principals often spend upwards of 50 hours preparing, for example, pre-enrolment meetings required for the transfer of information, the transition program, development of the teaching and learning program, completion of funding applications, etc. Other 'time costs' borne by the school include gathering reports and assessments, training of personal to support the student, attending Individual Learning Program (ILP) meetings in the before school setting. It is noted that a school is required to provide at least 10 weeks' worth of implementing adjustments before they receive the funding.

Early intervention and a higher level of support for students transferring from one setting to another is required. This will enable a better start for students, teacher, class and family. It may also prevent later issues and more costly interventions if the educational and support programs are targeted with the appropriate level of resourcing.

Principals believe a higher level of funding in the early years can assist in providing a more effective transition to school and address educational needs earlier, rather than later.

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

The full implementation of the NCCD has also coincided with the introduction of the National Disability Insurance Scheme (NDIS), the latter having impacted negatively upon schools. The funding for services, accessing therapy specialists, transitioning to school or next setting, and coordinating agencies that may be working with the family and child all present challenges on a number of levels. Another key demand is the obligation for schools to collaborate with external service providers e.g. special education staff and psychologists, speech pathologists, etc. The resourcing required falls further beyond the classroom with the additional administrative and management demands.

The coordination of outside specialist staff has shifted to the school, following the introduction of the NDIS. One principal spoke of up to 45 therapists or specialists visiting the school weekly. This requires a high level of practical coordination to ensure a room is free, student information and programs are updated, visitor information is checked (such as working with vulnerable people checks) and communication with the family is in place. Often, principals access school funds to meet considerable administrative costs in coordinating these meetings. One school advised it funds around one administration day per student to manage and coordinate the specialist's program. In addition to the standard meetings expected for a student with a disability, there are also additional costs in follow-up ILP meetings that keep staff informed.

Principals reported the role of case manager, in coordinating all the services for the student, including the educational program, is now with the school. This means liaising with outside agencies, health departments, individual providers and system supports. This role is not adequately funded under the current formula. Quite often, the approach taken in a consultation is one of triaging, with much of a meeting focusing on safety, personal care, medical issues or mobility. Principals, too, are increasingly conscious of action being taken as a result of workplace safety infringements. Understandably, a safety focus, and the directing of funds towards safety, can be prioritised to the detriment of the educational program.

Principals and schools are seeing the shift in coordination from a system managed model to a school managed model, with little flexibility in the new arrangement. The level of intervention can vary from student to student while the NCCD structure and the funding for students is rigid.

Principals indicate the process for accessing resources can be 'overly bureaucratic'. This can be related to expectations and interpretations of the National Disability Standards and/or Education Acts in each state and territory. So that completing documentation does not distract schools, teachers and parents from the real work of educating students with disability, jurisdictions need to review policies and practices to ensure what paperwork and documentation are absolutely necessary.

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

- Moderation is accepted to ensure consistency; however, the need to moderate every assessment is creating additional workload for teachers and, as a consequence, school leaders.
- Access to specialists or external providers is magnified for rural, regional and remote schools. The high cost of sending staff to professional learning or releasing staff when a specialist visits can use a considerable proportion of the funding for supplementary rated students.
- Access to therapy services and advice is vital if schools are to deliver a quality education program for students with disability. Students with additional/other needs (e.g. mental health) often present the most difficult teaching challenges and have a high cost resourcing component. Additionally, implementing effective management practices is hampered due to inconsistent or limited access to specialist professionals, e.g. psychologists. The outcome is a compounding of behaviours and incidents that lead to more severe consequences, including suspension from school.
- In addition, the inconsistent, and sometimes non-existent, therapy support can challenge the most committed teachers and teacher assistants. The school and teacher are required to develop an individual learning plan that outlines the educational and therapy needs of the child. Parents, too, are placed, at times, in competing positions of having to advocate on behalf of their child for specific agency service intervention. In some cases, the parent provides the only information about a student's learning needs.
- Other additional factors impacting include:
 - the lack of transparency of funding from a system (state or territory government) and the Federal government;
 - duplicate data and administration requirements between state and federal; and,
 - the more critical issue of having to cover safety/medical needs over educational needs.

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?

Auditing of the program is important to provide moderation and quality assurance. However, appropriate notice is required to ensure the school can provide access to the necessary documentation and personnel. It is perceived that short notice, (1 hour in one case reported) is more about 'catching schools/principals

out' rather than a professional approach to managing quality assurance. Principals report the process requiring documentation, evidence trail and management of information is overly bureaucratic and a compliance model rather than an educational accountability arrangement. The workload of administering the funding program should not be at the expense of ensuring students with disability have access to, and participate in, the educational program.

There is wide support for ensuring schools are accountable for how funding is managed and used. The engagement of an outside checking agency, more aligned to a business model of operation and without connection to primary schools, would be enhanced by utilising school leaders who have the day-to-day understanding of the demands and complexities of running a school.

Students should not be counted and measured as production outputs. Teachers, too, work hard to deliver effective educational programs, especially in relation to students with disability. The priority on learning and educational achievement should not be hijacked by 'zealous auditors' wishing to 'catch people out'. One principal reported that the auditors wanted to see the notes of every communication with parents and specialists. Does this mean a casual conversation after school between a teacher and the parent must be recorded? The evidence list should be reviewed and the function of different documents assessed for priority. This will allow schools and classroom teachers to focus on the important aspects of the NCCD funding model, not the trivial or non-productive documentation.

A key issue with the funding formula is the lack of funding allocation to schools for management and coordination of the information and processes required for the evidence collection. It is noted that the process for selecting the level of adjustment instrument is seven pages long with 171 questions, requiring school staff to work through each section to ensure they are correctly identifying the level of adjustment. This was noted by principals as overloading the work of teachers and school leaders, especially when large numbers of students are involved. Quality differentiated teaching practice is not done quickly; it requires time, evidence and professional judgement.

CONCLUSION

Providing a quality education for all students, including those with additional needs, places not only financial demands on schools but emotional demands as well. One principal made the comment that "teachers do the very best they can with what they know but they don't know what they don't know".

Teachers in mainstream classrooms do not always have the knowledge, skills and understanding to provide an evidence-based program for individual students with more complex needs. In recognising the ongoing cost of providing relevant training is substantial, it should also be seen that when training and support are limited there is an impact on student educational outcomes.

APPA fully supports the inclusion of students with disability in schools. It is in schools that children learn to participate in society by gaining the skills and knowledge, and the values and beliefs, lived every day in their classrooms. However, unsustainable pressures threaten the continuing capacity of schools to deliver on this aspiration. If the resources known to be required are not provided, it is an unrealistic community expectation that primary teachers and schools can adequately meet the full needs of children with disabilities. In too many situations, primary teachers and school leaders face unsustainable pressures. Unless funding and support levels match the expectations, those expectations are impossible to meet.