

Budget Proposal to the Select Standing Committee on Finance and Government Service

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The BCEdAccess Society is a volunteer-run, Canadian charitable organization with nearly 4,000 social media community members from all over the province of British Columbia. Since 2014, BCEdAccess' advocacy work has been by and for parents, guardians and students with disabilities and accessibility needs. This 2021-2022 Budgetary Proposal outlines a total of eleven changes parents and guardians have voiced as being critical to student success in this coming year; many of these issues have been raised, but not heard for over ten years by this and other B.C. government committees and representatives.

The proposals have been divided into two groups for coherency. The first: structural changes. Here, we use the term "structural change" to mean that the proposed change would be a systemic change, requiring the most support and which would yield the most significant impact. The second group, non-structural changes, refers to changes that build off existing structures, are generally lower cost and have high impact. The proposals are briefly summarized below.

STRUCTURAL CHANGES

1. Audit

We propose that 20% of each district's individual education plans (IEPs) be assessed annually to determine whether goals and strategies have been successful.

2. Education Assistant Standards of Practice

We endorse the work of the EA Standards Working Group who propose urgently establishing standards of practice for Education Assistants.

3. Increased Psycho-Educational Assessments

We propose increasing the number of psycho-educational assessments conducted per year with a targeted funding amount from the province and accountability to the province in it's spending.

4. Increased Funding to Educational Assistants

We propose an increase of funding directed to Education Assistants in British Columbia to increase the access to Education Assistants with a targeted funding amount from the province and accountability to the province in it's spending.

NON-STRUCTURAL CHANGES

1. Create Stronger Policy Language to Affirm that Equitable Access to Education Education is a Human Right

We request that the updated Inclusive Education Policy Manual be released without delay, along with any necessary changes to legislation and Ministerial Orders. Stronger policy language will affirm the human right to equitable access to education for all students.

2. Teacher Training – Anti-Ableism, Accessibility, and Anti-Racism

We propose that teacher pre-service and in-service training in anti-ableism, accessibility and anti-racism be mandatory with targeted funding allocated to these topics, prioritizing anti-Indigenous racism, decolonization and reconciliation efforts.

3. *Administrator Training – Anti-Ableism, Accessibility, and Anti-Racism*

We propose that principals, vice-principals and school board administrators in British Columbia be required to take mandatory pre-service and in-service training in anti-ableism, accessibility and anti-racism.

4. *Continued Support*

We propose to mandate that students with disabilities and accessibility needs retain their educational supports, even after significant improvement is observed.

5. *Education Assistant Continuity*

We propose the implementation of a formal process to be used in consultation with parents/guardians and students to decide on EA continuity.

6. *Create Additional Designations*

We propose that the Ministry of Education reassess the lack of designation classifications associated with many conditions to increase student success in B.C.; in particular but not limited to ADHD, to provide equitable access to education for all students under their charge.

7. *Create Needs-Based Funding*

We propose a change to the funding model to provide comprehensive support to disabled students, where funding should be allocated based on need instead of a flat amount of supplemental funding based on only certain medical diagnoses.

The BCEdAccess Society was started in 2014 and formally established in 2018 by and for parents and guardians of children and youth with disabilities and accessibility needs from around BC to achieve educational equity. Our social media community has nearly 4,000 members and our organization is run by volunteers. Now running for the fourth year, our [Exclusion Tracker](#) has been a valuable source of information about the unmet needs of disabled students in B.C.

To our knowledge, the Exclusion Tracker is the first substantial attempt in Canada to establish and quantify how prevalent cases of educational exclusion actually are. Our findings have been striking and directly contradict Canada's Equality Rights under section 15, which state

“15. (1) Every individual is equal before and under the law and has the right to the equal protection and equal benefit of the law without discrimination and, in particular, without discrimination based on race, national or ethnic origin, colour, religion, sex, age or **mental or physical disability**¹.”

They also contradict British Columbia's standard of education that “all children between the ages of 5-16 go to school²,” as we will explore below. The Exclusion Tracker is run annually throughout the school year. The results collected from the Exclusion Tracker are provided free to the general public in the form of interim reports throughout each school year, and as a final report at the end of each school year³.

These proposals are the result of input from parents, guardians and students with disabilities and accessibility needs over the past seven years. We have selected four structural and seven non-structural changes to propose to this committee. We chose the structural changes based on a combination of feedback from our members and our organization's assessment of how we can best achieve their desired outcomes.

BCEdAccess has been tracking common topics in our online forum since 2014. We chose the most common of these and presented them in a survey of community members. They indicated their top choices for changes they want BCEdAccess to pursue, from the longer list of topics presented in the survey. This resulted in the eight non-structural changes we are asking the committee to recommend.

When we reached out to our community in this way, we overwhelmingly heard calls for accountability, which is currently lacking in the British Columbia education system. The complaints process requires a bottom-up approach which is onerous for students with disabilities and accessibility needs and their families, rather than offering a top-down approach of accountability through the mechanisms we propose.

¹ Government of Canada, Department of Justice. 1999. “Charterpedia - Section 15 – Equality Rights.” Retrieved September 20, 2021

(<https://www.justice.gc.ca/eng/csj-sjc/rfc-dlc/ccrf-ccdl/check/art15.html>).

² The Ministry of British Columbia. n.d. “British Columbia's Education System.”

³ BCEdAccess Society. 2020. “Exclusion Tracker.” BCEdAccess. Retrieved September 20, 2021 (<https://bcdaccess.com/exclusion-tracker/>).

INTRODUCTION

Structural budgetary changes are defined as changes that can have a broad systemic impact. These proposed structural changes may in some cases incur more spending and require more maintenance by the Ministry of Education. Based on the barriers we know are faced by students with disabilities and accessibility needs in BC and in reviewing our collected data, we have chosen these changes to bring forward: an Audit of Outcomes for Disabled Students, Education Assistant Standards of Practice, Increased Psycho-Educational Assessments, and Increased Funding To Educational Assistants.

As mentioned above, the overwhelming call to action when we addressed our members and volunteers was for accountability. For accountability regarding whether Individualized Education Plans (IEPs) are conducted to optimize student success, we have proposed an annual audit of goals and outcomes. For accountability for Education Assistants (EAs), we propose a common set of Standards of Practice and increased funding of the position; and for accountability to the students of British Columbia, we propose an increase in Psycho-Educational Assessments and testing, in addition to Increased funding to Educational Assistants. These changes have the potential to break down significant barriers and vastly improve the experience of education in BC for children and youth with disabilities. BCEdAccess is hopeful that by proposing these structural changes, we can help the BC government support Canada in meeting its obligations under the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD⁴) and the United Nations Convention on the Rights of the Child (UNCRC⁵).

AUDIT

In BC's K-12 education system, budgetary allocation of funds is on a per-student basis, provided to the School District or Independent School Authority. When a child or youth is designated by the Ministry of Education as having a disability requiring intervention, the School District or Independent School Authority is provided with supplemental funding based on this designation⁶ (See [Table 1](#), [Table 2](#) and [Table 3](#)). The funding to support these designations is said to be included in the base per-student funding provided to the School Districts and Independent School Authorities. The current per-student funding is \$1,000

⁴ Anon. n.d. "Convention on the Rights of Persons with Disabilities (CRPD) | United Nations Enable." Retrieved September 20, 2021 (<https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html>).

⁵ Anon. n.d. "UN Convention On The Rights Of The Child | Save the Children UK." Retrieved September 20, 2021. (<https://www.savethechildren.org.uk/what-we-do/childrens-rights/united-nations-convention-of-the-rights-of-the-child>).

⁶ Anon. n.d. "2021/22 Estimated Operating Grants." Retrieved September 20, 2021. (<https://www2.gov.bc.ca/gov/content/education-training/k-12/administration/resource-management/k-12-funding-and-allocation/operating-grants/k12funding-21-22>).

below national average (See [Figure 7](#))⁷. Regardless of how funds are provided to account for the additional accessibility needs of designated students, many School Districts have said that they spend more than twice what they receive on their students with disabilities and accessibility needs.

The School District or Independent School Authority is free to use their discretion regarding how to spend these funds. As stated in the K-12 Funding - Special Needs policy,

“These funds are not targeted to specific students; however, are provided to boards of education to support the needs of students within their district⁸.”

As a result, the per-student allocation or supplemental amount may fail to impact the student(s) in question. The K-12 Funding - Special Needs Policy states that students “may require additional support and accommodations to enable them to access and participate in educational programs,” however the lack of accountability within this policy endangers the ability of students to both access and participate in the education programs within the education system of British Columbia.

We are not proposing an audit of funding here; rather, we would like to see an annual audit of how the students with IEPs are achieving their set goals as established in their IEP. This proposal comes in the wake of the data collected regarding decreased graduation rates for students with disabilities and accessibility needs shown in [Figure 6](#). We want to create a platform for district accountability in how it supports its disabled students.

We propose that 20% of each district’s individual education plans (IEPs) be assessed annually to determine whether goals and strategies have been successful.

The Ministry of Education already conducts an annual audit of IEPs, but only of students with additional funding and only to assess that the IEPs exist and are correct (i.e. the student diagnosis matches designation criteria, and that ‘some’ level of service is being provided). This current system fails to account for the quality and evidence-based effectiveness of the IEP, and leaves out conditions such as dyslexia, dysgraphia, ADHD, anxiety disorders, and many others which occur in particularly high numbers of the student population (formerly known as ‘high incidence’ disabilities). The current audit looks at the presence or absence of mandatory IEPs, and does not assess their effectiveness, nor the impact seen by the student, parents or teachers.

Our proposed change will not only create evidence-based accountability which is lacking in today’s K-12 education system, but will also be a means for teachers (and other staff, specialists and administrators) to receive feedback on effective methods for students with

⁷ Education. 2019. “B.C. Students Benefiting from More per-Student Funding | BC Gov News.” Retrieved September 22, 2021

(<https://news.gov.bc.ca/factsheets/bc-students-benefiting-from-more-per-student-funding>).

⁸ Anon. n.d. “K-12 Funding - Special Needs.” Retrieved September 20, 2021.

(<https://www2.gov.bc.ca/gov/content/education-training/k-12/administration/legislation-policy/public-schools/k-12-funding-special-needs>).

disabilities to enhance student success. This is not only beneficial, but necessary to achieve high and measurable standards within the BC K-12 education system; especially given the objectives stated in the ministry of education's Framework for Enhancing Student Learning webpage⁹, and to contribute to *The Educated Citizen* as described in the ministry's Policy for Student Success¹⁰. Today, there is no provincial regulation for the education of teachers in facilitating the education of students with disabilities in BC, and are lacking globally. This is made worse by the lack of standardized education for Education Assistants (See [Education Assistant Standards of Practice](#), [Teacher Training](#)), which leaves teachers with inconsistent resources to ameliorate their classroom accessibility. Manitoba has a compilation of expectations for EAs in their ministerial publication, Educational Assistants in Manitoba¹¹, which is more than BC has, but is still insufficient.

By tracking the progress of individual students with disabilities rather than exclusively their allotted funding, we can maintain a relative fluidity within the school district to have the autonomy to allocate resources as needed. An annual audit of progress has the potential to streamline the existing system rather than rethinking its foundation.

EDUCATION ASSISTANT STANDARDS OF PRACTICE

Since the establishment of the BCEdAccess Society in 2014, members have consistently advocated for Education Assistants to be treated as respected professionals, since they are essential members of the support team for their children and youth at school. It has been pointed out that without standards of practice it is difficult to assign the role of professional to these critical staff. We are founding members of the [Education Assistant Standards Working Group](#), which is a valuable resource to these ends. This proposal addresses the need for greater accountability for Educational Assistants (EAs). We hope to amplify the voices of our members and our community here.

The Education Assistants (EAs) Standards of Practice Working Group has worked to fill the gap in knowledge regarding this subject, and concisely states the current status of work towards the implementation of EA standards of practice

“In February 2019, the Minister of Education directed his team to complete jurisdictional scanning and intensive background work. The Ministry conducted research, jurisdictional scanning, and some consultation to better understand the EA scope of practice, the parent perspective, workforce characteristics, and of course supply and demand. Further, the Ministry reviewed various calls to action to better

⁹ Anon. n.d. “Framework for Enhancing Student Learning.” Retrieved September 20, 2021. (<https://www2.gov.bc.ca/gov/content/education-training/k-12/administration/program-management/enhancing-student-learning>).

¹⁰ Anon. 2021. “Policy for Student Success Educated Citizens Who Thrive in a Rapidly Changing World.” Retrieved September 20 2021. (https://www2.gov.bc.ca/assets/gov/education/administration/kindergarten-to-grade-12/understanding_the_bc_policy_for_student_success.pdf).

¹¹ Manitoba Education. n.d. “Educational Assistants in Manitoba Schools.”

understand the issues and considerations including requests from Education Advocates, Resolutions from Partner Groups including the BCSTA and BCCPAC, and the Select Standing Committee on Finance. The Ministry also explored different Policy considerations surrounding standardization of practice, regulation models, and other jurisdictional practices across the Province and the Country. This work has been stopped due to COVID. We need this work to continue and provincial standards of practice in place¹².”

In British Columbia, there is no professional body governing education assistants - people who have the privilege of working closely with students with disabilities. There are no standardized program requirements for education in EA certification (e.g. [Douglas College](#), [Camosun](#), [Langara](#), [Burnaby Community](#), [Sprott Shaw College](#), [Okanagan College](#), various programs offered by School Districts), and consequently, EAs in BC do not have a common set of foundational skills and experience, with widely varying abilities and effectiveness. In BC, EA training can range from 2 weeks to 2 years, and in EA shortages, school districts hire people “with no specific training to fulfil this critical role”¹³. Inextricably related to this issue is the significant and ongoing shortage of EAs in BC, which can be tied to the lack of professional status, the lack of EA funding¹⁴ and unsustainable work conditions¹⁵ associated with the profession.

The role of the EA in a classroom is to “carry out the work that has been planned and developed by the teacher, either with an individual student or a small group”¹⁶, and, more generally, to “assist teachers and counsellors with teaching and non-instructional tasks”¹⁷. This role is critical not only in individual student education, safety and integration; but in the overall efficacy of the classroom. As it stands, EAs mainly work under the general direction of teachers, and are supervised by the principal and/or vice-principal of a school¹⁸. By establishing standards of practice, the interests of the EAs themselves can be accounted for, parents can have a streamlined manner in which they can file requests and complaints, and teachers and principals alike can be more effective in their roles.

¹² Webster, Rob, Peter Blatchford, Paul Bassett, Penelope Brown, Clare Martin, and Anthony Russell. 2011. “The Wider Pedagogical Role of Teaching Assistants.” *School Leadership & Management* 31(1):3–20. doi: 10.1080/13632434.2010.540562.

¹³ Webster, Rob, Peter Blatchford, Paul Bassett, Penelope Brown, Clare Martin, and Anthony Russell. 2011. “The Wider Pedagogical Role of Teaching Assistants.” *School Leadership & Management* 31(1):3–20. doi: 10.1080/13632434.2010.540562.

¹⁴ gssi. n.d. “Wage Schedules.” BC Public School Employers’ Association. Retrieved September 20, 2021 (<https://bcpsea.bc.ca/support-staff/collective-agreements/wage-schedules/>).

¹⁵ Clare Hennig -. CBC. n.d. “Education Assistant Shortage Due to Working Conditions, Not Lack of Training, Claims Union Representative | CBC News.” CBC. Retrieved September 20, 2021 (<https://www.cbc.ca/news/canada/british-columbia/education-assistant-shortage-working-conditions-1.4583039>).

¹⁶ Anon. n.d. “Professional Issues.” Retrieved September 20, 2021 (<https://www.bctf.ca/advocacy-issues/professional-issues/>).

¹⁷ Anon. n.d. “Elementary and Secondary School Teacher Assistants (NOC 4413).” WorkBC. Retrieved (<https://www.workbc.ca/careers/4413>).

¹⁸ Anon. n.d. “ACT Information Resource: Roles and Responsibilities of Teachers and Teacher Assistants/Education Assistants.” ACT - Autism Community Training. Retrieved September 20, 2021 (<http://www.actcommunity.ca/resource/468>).

We endorse the work of the EA Standards Working Group who propose urgently establishing standards of practice for Education Assistants.

“The talk of provincially mandated standards of practice has been ongoing for a number of years. The prevalence of the need for the role of an education assistant is growing, and this is BC’s opportunity to lead the country”¹⁹.

(See [Increased funding to Educational Assistants](#), [Education Assistant Continuity](#))

“Standards are commonplace in B.C. ... Early childhood educators, teachers, nurses, health care assistants, fitness instructors, and nail technicians have them. Work that is required of a person that impacts the wellbeing of others and that involves potential risk to themselves, has standards of practice, that is, except for Education Assistants²⁰.”

Internationally, education assistants (and their cultural equivalents) have been identified as being under prepared, underfunded and poorly managed. Given the importance of their role in supporting not only students with disabilities and accessibility needs but entire classrooms, teachers and administrators, this needs immediate attention from the Ministry of Education to ameliorate the situation across the province. EAs are no longer kind grandparents with spare time coming in to read to students or be an extra set of eyes on the playground. They have a serious and challenging role in our education system and should be recognized and treated as such.

At this time, there are 60 BC school districts and within them 200 different job descriptions for the role of education assistant²¹, which have been reduced to 8 different categories by the MoE/ CUPEBC Support Staff Initiative for Recruitment and Retention Enhancement (SSIRRE) committee²². These positions across BC range in not only qualification and job description, but salary – from a district average of \$19.38/hr in the district of Boundary to \$32.00/hr in the district Okanagan Skaha (See [Figure 1](#))²³. [Figure 2](#) and [Figure 3](#) illustrate how varied pay is for available EA positions in a single district. It is important to note that the lowest paid EAs are those assigned to Indigenous students.

Not only would a set standard of practice establish a more efficient system within BC better support student success, but it would also serve as a global example to increase the standards of student success for the chronically underserved demographic of students with

¹⁹ Webster, Rob, Peter Blatchford, Paul Bassett, Penelope Brown, Clare Martin, and Anthony Russell. 2011. “The Wider Pedagogical Role of Teaching Assistants.” *School Leadership & Management* 31(1):3–20. doi: 10.1080/13632434.2010.540562.

²⁰ Anon. n.d. “B.C. Education Assistants Still without Standards of Practice: Advocates - NEWS 1130.” Retrieved September 20, 2021 (<https://www.citynews1130.com/2020/10/13/education-assistants-bc-standards-practice/>).

²¹ gssi. n.d. “Wage Schedules.” BC Public School Employers’ Association. Retrieved September 20, 2021 (<https://bcpsea.bc.ca/support-staff/collective-agreements/wage-schedules/>).

²² gssi. n.d. “Wage Schedules.” BC Public School Employers’ Association. Retrieved September 20, 2021 (<https://bcpsea.bc.ca/support-staff/collective-agreements/wage-schedules/>).

²³ gssi. n.d. “Wage Schedules.” BC Public School Employers’ Association. Retrieved September 20, 2021 (<https://bcpsea.bc.ca/support-staff/collective-agreements/wage-schedules/>).

disabilities and accessibility needs, to uphold the United Nations human rights convention, the Convention on the Rights of Persons with Disabilities (CRPD)²⁴. Evidence-based, innovative practices could be more easily implemented to support educators and students in providing a baseline standard of service with less burnout.

INCREASED PSYCHO-EDUCATIONAL ASSESSMENTS

There is a significant need for increased and fully funded psycho-educational assessments across British Columbia. In its current form, access to psycho-educational assessments is an inequitable two-tiered system. A psycho-educational assessment is an examination by which a child or youth's psychological processes that contribute to learning are assessed, most commonly by a psychologist. Psycho-educational assessments are critical to understanding how a child or youth learns, what supports they may need and to determine whether any learning disabilities are present.

School Districts only provide a limited number of psycho-educational assessments per year. As an example, according to what parents and guardians have been told, Coquitlam only provides two psycho-educational assessments per school, per year. This number is related to how many psychologists the school district employs to do these assessments. Because of these known limits on the number of assessments provided, administrators don't keep a waitlist of families who are asking for their child or youth to be assessed. They actively discourage families by saying that it's not needed before a certain age, or that they are only done after a certain grade. In fact, we know that early intervention is critical for more severe learning disabilities as it becomes much harder to remediate after the first few years of school.

This gatekeeping means that it's difficult to actually know how many students might need an assessment at any given time, or how long the wait would actually be if all students needing an assessment were put on a list until they received one. The demand for assessments is certainly not being met. Parents and guardians say that in many of their school districts, they have been told that the only assessments being done every year are for grade 12 students. The missed opportunities for early intervention, and further costs down the line for more complex support needs due to the delay in (or absence of) assessment, can certainly be related to the disparity in graduation rates between disabled students and other BC learners (See Figure 5).

Because of the value of these assessments both in providing the knowledge needed for ensuring correct and effective supports, and in being able to access supplemental funding for students because they may be provided with a Ministry of Education designation after receiving a diagnosis, some parents choose to have these assessments done privately. This is a source of inequity as the cost of a private psycho-educational assessment can exceed

²⁴ Anon. n.d. "Convention on the Rights of Persons with Disabilities (CRPD) | United Nations Enable." Retrieved September 20, 2021 (<https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html>).

\$3,000²⁵ and as such is not accessible to many families. Notably, even with a private assessment in hand, often families find that the school district will not accept the recommendations made by private psychologists and so students may still need to wait for an assessment by the school district before they get needed support.

Instead of waiting for children and youth to fall behind, fail grades and become anxious and self-conscious of their abilities, the need for some psycho-educational assessments could be reduced by screening for conditions earlier. This is not only cost effective (for example, a Kindergarten/Grade 1 dyslexia screening costs at most \$10 per screening), it also allows learning support needs to be caught earlier, IEPs can be more accurate and targeted, and it reduces the likelihood of comorbid-condition development, where other conditions develop in addition to a primary condition and have significant impact on the person in question, the effects of their primary condition and applicable treatment options.

As a result, it is incredibly important to screen children in Kindergarten/grade 1 for dyslexia and other learning disabilities, to identify urgent needs for early intervention. It is also important to ensure that there is a written procedure to determine which students are recommended for a psycho-educational assessment, that all students who need an assessment are put on a school waitlist and that the resulting data is reported at the provincial level.

We propose increasing the number of psycho-educational assessments conducted per year with a targeted funding amount from the province and accountability to the province in its spending.

INCREASED FUNDING TO EDUCATIONAL ASSISTANTS

97% of respondents to the poll shared with the nearly 4,000 community members of the BCEdAccess Society felt this was something that should be raised with the Committee. The shortage of Education Assistants in BC is well documented in the media and in other places.

We propose an increase of funding directed to Education Assistants in British Columbia to increase the access to Education Assistants with a targeted funding amount from the province and accountability to the province in its spending.

Commonly cited causes for the shortage of EAs involve the lack of standards for EAs resulting in the devaluing of their work, an ongoing call to action over the last 30 years,

²⁵ Enright-Morin, Nic. n.d. "Demystifying Psychological Educational Assessments - BC Parent Newsmagazine." Retrieved September 30, 2021 (<https://bcparent.ca/health/demystifying-psycho-ed-assessments/>).

which has gone unprioritized by the Ministry of Education²⁶. Burnaby and several other School Districts have gone so far as to start their own programs to train EAs to compensate for the dire shortage; however, many already certified EAs state that an increase of EA certification and training is not going to solve the problem when the poor work conditions remain unaddressed²⁷. Solutions such as the quick turnaround course offered by the Burnaby school district (5 months in training prior to practicum, compared to 2 years at Douglas College) risk of lowering already inconsistent standards for EA certification rather than addressing the root cause of the shortage, which, again, is poor working conditions. The assorted levels of pay displayed in [Figure 1](#) demonstrate the need not only to homogenize standards of practice across the province but the need to increase EA funding overall and [Figure 2](#) and [Figure 3](#) show the lack of consistency even at the district level. While the rate of pay for EAs is irrefutably low, and the hours inconsistent, the supplemental funding provided which may, among other costs, be used to pay EA salaries (see [Table 1](#)) is insufficient to cover a part or full-time EA, let alone to pay for physiotherapy, occupational therapy psycho-educational assessments, learning support teachers, resource rooms, and the many other ways students are supported.

The impact of this shortage of EAs in the BC K-12 education system on student success is devastating. The solution for many schools is to exclude students from their education in a number of different ways²⁸. When surveys demonstrate that 50% of parents and guardians of students with disabilities report that their child/youth has had experiences of exclusion on the basis of the EA shortage²⁹, the Ministry of Education must act.

Many school districts are now saying that education assistants are there to support the whole class, but some are still assigned to specific students. Regardless of the intention for Education Assistants to attend to one particular student, they often act as assistants to the class as a whole in addition to their assigned student. This dual function of specific-student and whole-class assistant is often stated as a reason why a student with disabilities and accessibility needs should stay home, thereby excluded from the BC education system³⁰. Increasing the EAs available by providing school districts with sufficient appropriate

²⁶ Anon. n.d. "B.C. Education Assistants Still without Standards of Practice: Advocates - NEWS 1130." Retrieved September 20, 2021

(<https://www.citynews1130.com/2020/10/13/education-assistants-bc-standards-practice/>).

²⁷ Clare Hennig . CBC. n.d. "Education Assistant Shortage Due to Working Conditions, Not Lack of Training, Claims Union Representative | CBC News." CBC. Retrieved September 20, 2021 (<https://www.cbc.ca/news/canada/british-columbia/education-assistant-shortage-working-conditions-1.4583039>).

²⁸ Kines, Lindsay, and Jeff Bell. 2019. "Shortage of Educational Assistants Forces Some Greater Victoria Students to Stay at Home." *Vancouversun*. Retrieved September 20, 2021 (<https://vancouversun.com/news/local-news/shortage-of-educational-assistants-forces-some-greater-victoria-students-to-stay-at-home>).

²⁹ Kines, Lindsay, and Jeff Bell. 2019. "Shortage of Educational Assistants Forces Some Greater Victoria Students to Stay at Home." *Vancouversun*. Retrieved September 20, 2021 (<https://vancouversun.com/news/local-news/shortage-of-educational-assistants-forces-some-greater-victoria-students-to-stay-at-home>).

³⁰ Anon. n.d. "B.C. Education Assistants Still without Standards of Practice: Advocates - NEWS 1130." Retrieved September 20, 2021 (<https://www.citynews1130.com/2020/10/13/education-assistants-bc-standards-practice/>).

funding, will benefit not only students with disabilities and accessibility needs, but the class as a whole. It will be necessary to implement standards of practice at the same time to make use of this funding for recruitment and retention.

We are asking that the government of BC provide a specific, targeted and increased amount of money to school districts and independent school authorities to increase the number of EAs, provide funding for a recruitment and retention strategy, consult with unions on the best approach but this strategy could include year round salaried positions with benefits as one example, and establish accountability to the province for the use of these targeted funds.

INTRODUCTION

We're defining non-structural changes as changes that are lower in cost to establish while still maintaining the potential for significant, systemic improvements. The seven proposed changes are: Create stronger Policy Language to Affirm that Equitable Access to Education Education is a Human Right, Teacher Training – Anti-Ableism, Accessibility and Anti-Racism, Administrator Training – Anti-Ableism, Accessibility and Anti-Racism, Accessibility and Anti-Racism Training, Continued Support, Education Assistant Continuity, Create Additional Designations, Create needs-based funding.

These each have the potential to have a strong positive impact on student success including outcomes such as completion/graduation rates, and equity. These non-structural changes complement the structural ones. By supporting individuals, the system itself can be made stronger.

CREATE STRONGER POLICY LANGUAGE TO AFFIRM THAT EQUITABLE ACCESS TO EDUCATION IS A HUMAN RIGHT

Equitable access to education is a human right, not a privilege. This right^{31 32 33}, however, is not clearly and unequivocally stated in Canadian or BC law. As a result, the experience of education varies greatly among marginalized communities especially. The Canadian Charter of Rights and Freedoms defines the provisions through which provinces can make laws in relation to education and minority language educational rights. At the provincial level, the School Act legislates that children between the ages of five and sixteen must go to school. Canada ratified the United Nations Convention on the Rights of Persons with Disabilities (CRPD) in 2010. Parties to the CPRD are required to promote and ensure the full enjoyment of human rights of persons with disabilities including full equality under the law.

We request that the updated Inclusive Education Policy Manual be released without delay, along with any necessary changes to legislation and Ministerial Orders. Stronger policy language will affirm the human right to equitable access to education for all students.

Ontario is an example of a province with stronger policy language regarding accessible education, where the Ontario Human Rights Code states the following:

“The Ontario *Human Rights Code* (Code) recognizes the importance of creating a climate of understanding and mutual respect for the dignity and worth of each person, so that each person can contribute fully to the development and well-being

³¹ Inclusive Education Canada. 2014. “Right to Education.”

³² A Consolidation of the Constitution Acts 1867 to 1982. Government and Canada, Jan. 2021, https://laws-lois.justice.gc.ca/PDF/CONST_TRD.pdf.

³³ School Act. https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96412_02. Accessed 30 Sept. 2021.

of the community and the Province. The *Code* guarantees the right to equal treatment in education, without discrimination on the ground of disability, as part of the protection for equal treatment in services. This protection applies to elementary and secondary schools, and colleges and universities, both public and private.³⁴

British Columbia should adopt similar policy language to what is present in Ontario, especially as Canada has ratified the UN Convention on the Rights of Persons with Disabilities. Article 24 of which states that discrimination against children with disabilities and accessibility needs is prohibited, while mandating the right to inclusive education³⁵.

BCEdAccess communicated our concerns about the current Special Education Policy Manual. In brief, it is highly outdated (very little content has changed since 1995), with many examples of ableist and even racist language and policy. Links to referenced documents are broken, The diagnostic manual referenced throughout was replaced with a new and significantly different version 8 years ago. School Districts are operating with an outdated policy which does not reflect a rights-based perspective, the language is weak, and some of it provides school districts with a 'way out' of inclusion. Ultimately, without clarity, consistency and accountability measures, the current Special Education Policy Manual is an ineffective roadmap to ensuring the right to equitable access to education.

TEACHER TRAINING – ANTI-ABLEISM, ACCESSIBILITY, AND ANTI-RACISM

Ableism is the discrimination of and social prejudice against people with disabilities, both visible and invisible, based on the belief that typical abilities are superior. At its heart, ableism is rooted in the assumption that disabled people require 'fixing' and it defines people by their disability. Anti-ableism and accessibility training for teachers is essential to ensure that the needs of students with disabilities and accessibility needs are met, in addition to reducing the prevalence of ableism within educational institutions. The School Act defines teachers' responsibilities as the following:

1. A teacher's responsibilities include designing, supervising and assessing educational programs and instructing, assessing and evaluating individual students and groups of students.
2. Teachers must perform the duties set out in the regulations³⁶.

Without adequate training, teachers will not be able to fulfill their responsibilities to teach students with disabilities and accessibility needs. Designing, supervising and assessing educational programs and instructing, assessing and evaluating students is not possible if

³⁴ Anon. n.d. "Policy on Accessible Education for Students with Disabilities | Ontario Human Rights Commission." Retrieved September 20, 2021

(<http://www.ohrc.on.ca/en/policy-accessible-education-students-disabilities>).

³⁵ Inclusive Education Canada. 2014. "Right to Education."

³⁶ SCHOOL ACT REVISED STATUTES OF BRITISH COLUMBIA. Government of British Columbia, 1996, <https://www2.gov.bc.ca/assets/gov/education/administration/legislation-policy/legislation/schoollaw/revisedstatutescontents.pdf>.

these processes are ableist and inaccessible. Inaccessible, ableist pedagogy will undermine these processes and create barriers to education that compromise any true and effective evaluation of disabled students.

Teachers are responsible for the educational development of their students and should have the most contact with students day-to-day. In reality many disabled students spend more time outside of the classroom than in it, in part because teachers don't feel prepared to provide educational support to them. Thus, teachers should receive mandatory pre-service and in-service anti-ableism and accessibility training, to benefit disabled students, and all students.

Anti-racism training is critical to meet the needs of Black, Indigenous and People of Colour (BIPOC) students. Racism is common in educational institutions and creates further barriers to education, something that, for disabled students, is a compounding factor in lack of access.

To quote Lydia X. Brown: "Students of color – especially Black, Brown, and Native students – are disproportionately over- and under-identified as disabled throughout their schooling. School systems administrators are quick to make spurious diagnoses of stigmatized and criminalized disabilities for students of color. They're also far less likely to accurately identify learning and developmental disabilities when actually present in the same population³⁷."

Teachers need training to reduce the prevalence of racism within schools so equity can be achieved. This training should occur through, but not be limited to professional development days focused on anti-racism training, with an emphasis on anti-Indigenous racism.

Anti-Indigenous racism training is particularly critical due to the history of systemic racism within schools against Indigenous children and youth. Whether it be residential schools or contemporary day schools, such as Thunder Bay where Indigenous children are forced to leave their homes and enter a hostile environment to receive education, the barriers to education are extensive for Indigenous children and youth. Anti-Indigenous racism is so prevalent in British Columbia, that it has had a significant impact on the graduation rates of Indigenous students compared to their non-Indigenous peers. In 2016/2017 the graduation rate of Indigenous students was only 66% compared to the provincial average of 87%. School District 57 (Prince George) recently released a report detailing the governance practices within the district. The report proved that Indigenous students are disproportionately held back, placed in alternative classes and programs and otherwise removed from the typical graduation path. While this report is from a specific school district, it illustrates the need for not only a systematic review of all school districts³⁸, but for anti-racism training, with a focus on anti-Indigenous specific racism.

³⁷ We Can't Address Disability without Addressing Race. – Learn Play Thrive.
<https://learnplaythrive.com/we-cant-address-disability-without-addressing-race/>. Accessed 30 Sept. 2021.

³⁸ 'Press Release – Advocacy Groups Call for Review of Systemic Discrimination by BC School Boards and Districts'. BCEdAccess, 6 May 2021,
<https://bcedaccess.com/2021/05/05/press-release-advocacy-groups-call-for-review-of-systemic-discrimination-by-bc-school-boards-and-districts/>.

We propose that teacher pre-service and in-service training in anti-ableism, accessibility and anti-racism be mandatory with targeted funding allocated to these topics, prioritizing anti-Indigenous racism, decolonization and reconciliation efforts.

In summary, two types of training should be mandatory (but not limited to): updates to post-secondary teacher curriculum to include explicit learning and teaching regarding anti-ableism, accessibility and anti-racism, and mandatory professional development days each year on anti-ableism, accessibility and anti-racism, at least one of which will include all school and district staff, from the principal to the custodian to the superintendent. A third suggestion is implementing something similar to the SOGI123 curriculum resources that addresses other issues of oppression, such as racism and ableism in age-appropriate ways for students.

ADMINISTRATOR TRAINING – ANTI-ABLEISM, ACCESSIBILITY, AND ANTI-RACISM

It is critical that principals, vice-principals and school district staff and administrators receive accessibility training given the power and authority their positions allow. In British Columbia, administrators at all levels are teachers who have applied successfully to their position, and generally have the same teacher education. Not many teachers have additional education related to disability. Under section 5 of the School Act, principals and vice-principals have the power to

- (b.1) consult with teachers assigned to a school regarding the organization of classes in the school and the placement of students with special needs in those classes,
- (b.2) consult, if the principal considers it advisable, with students and the parents' advisory council regarding the organization of classes in the school,
- (c) evaluate teachers under the person's supervision and report to the board as to the person's evaluation³⁹

Principals and vice principals essentially serve as a primary means of accountability for teachers, and, at this time, EAs (See [Education Assistant Standards of Practice](#)). In order to affirm and reinforce the training of teachers we have suggested above, it is necessary to additionally train their supervisors. Principals and vice principals can also lend themselves to teachers as resources to ameliorate the teaching conditions for students.

We propose that principals, vice-principals and school board administrators in British Columbia be required to take mandatory pre-service and in-service training in anti-ableism, accessibility and anti-racism.

³⁹ Anon. n.d. "School Regulation Authority: School Act, Sections 5 and 175."

In addition to the authority principals and vice principals have regarding teachers, they maintain the authority to consult not only teachers but parents on the conditions in which students learn. Principals and vice-principals also provide input in creating and altering student IEPs⁴⁰. In order for students to most benefit from such input, principals must understand their students and their needs. Principals and vice principals as well as district administrators need a deeper understanding of what it is to work with students with disabilities and accessibility needs in order to speak to how they should be supported. Too often recommendations are made because of a lack of training in accessibility, that then cause harm to student learning outcomes.

A few anonymous quotes from the BCEdAccess Exclusion Tracker:

“I’m being told this will be a standing policy - that my son has to make sure everyone feels safe or he won’t be allowed to go to recess. This is coming from the principal, not the classroom teacher⁴¹.”

“The principal has decided to limit time at school for the transition. They have unilaterally prescribed a timeline and are not responding to [a] child’s requests to attend for [a] longer time. They flatly refuse to provide classroom support in order to lengthen time at school⁴².”

“We were returning to in person learning after a year off. During the spring I had several meetings with the principal, as well as the week before school outlining my child’s needs. My child has previously attended this school so they know her well. One of the things asked for was an EA present at drop off as transitions are hard... There was no EA and no familiar face to transition to. She was crying and shaking .. There was no EA present at all that day, so she was unable to [use the] toilet. My child was very upset and at the end of the day asked “mommy why did you have to leave me when I was so scared?””

This last quote is from a parent reporting exclusion in the first week of school, 2021. The role of teachers and EAs in the lives of students is critical, their coordination is managed by principals and vice-principals⁴³, and many impactful decisions are made by school district administrators. The educational structure a student receives is often determined, or heavily influenced by both principals and vice-principals, as well as school district administrators, and they must be adequately prepared for the obligations that position entails beyond the training they received as teachers.

While we are advocating for this training for the benefit of students with disabilities and accessibility needs as well as for racialized students, the benefits to this will be felt by all students in BC’s K-12 education system. All students are impacted by racism. No individual

⁴⁰ 2009. “Province of British Columbia Individual Education Planning for Students with Special Needs.”

⁴¹ BCEdAccess Society. 2021. “Discrimination By The Numbers: A BCEdAccess Exclusion Tracker Report.”

⁴² BCEdAccess Society. 2021. “Discrimination By The Numbers: A BCEdAccess Exclusion Tracker Report.”

⁴³ Anon. n.d. “School Regulation Authority: School Act, Sections 5 and 175.”

has the same learning needs, and the standardized system overlooks this by failing to provide diverse means of communication⁴⁴. This is further emphasized by the field of Multimodal Communication – the study of how we as humans communicate with one another. Humans learn best through exposure to as many different modes of communication as possible⁴⁵, and, “because no learners have identical needs, abilities and ways for learning, the use of inclusive teaching in one’s classroom will serve well all students in [the] class⁴⁶.”

The Ontario Ministry of Education has integrated into their *Policy on accessible education for students with disabilities* strategies to address

“new and emerging issues in the area of disability and education, including:

the impact of ableism on the delivery of education and on the experiences of students with disabilities

the evolving legal definition of disability, and its implications for education providers

the duty of education providers, in certain circumstances, to inquire into whether a student has needs related to a disability, and to offer assistance and accommodation, even if the student has not made a specific accommodation request

the type of medical/healthcare information that can be requested by education providers and should be provided by students to support an accommodation request.

It is the OHRC’s intention that the *Policy on accessible education for students with disabilities*, 2018 will help education providers recognize and fulfil their obligations under the code...”

This training will improve effective allocation of resources within schools to ultimately support and amplify student success and should also minimize the negative impacts of ableism and racism currently felt by students in classrooms today. This will also help to build the capacity of School Districts in BC to better serve racialized and disabled students. We can increase this capacity province-wide more rapidly by applying this training to School District and Independent School Authority administrators at the same time.

CONTINUED SUPPORT

74% of the parents, guardians, and students with disabilities and accessibility needs who responded to our survey selected the opportunity to mandate that supports for

⁴⁴ Nilson, Linda B. (2010). *Teaching at Its Best: A Research-Based Resource for College Instructors* (3rd ed). John Wiley and Sons.

⁴⁵ Yelland, Nicola J. 2018. “A Pedagogy of Multiliteracies: Young Children and Multimodal Learning with Tablets.” *British Journal of Educational Technology* 49(5):847–58. doi: 10.1111/bjet.12635.

⁴⁶ Beaudoin, Jean-Pascal. n.d. “INTRODUCTION TO INCLUSIVE TEACHING PRACTICES.”

students with disabilities and accessibility needs be maintained even after significant performance improvement is observed. This is a strong indicator of how important this issue is to families.

We propose to mandate that students with disabilities and accessibility needs retain their educational supports, even after significant improvement is observed.

Often, when a student with disabilities and/or accessibility needs demonstrates significant improvement, the structures which enabled them to succeed are removed under the assumption that the student can now navigate the standardized system without them. This assumption is incorrect. Disabilities are generally lifelong experiences that set people apart. When people manage to achieve their goals (as set in an IEP or otherwise) with the use of supportive structures, their disability(ies) have not vanished; their abilities have just been reinforced and facilitated. This is true of physical disabilities, and equally for neurological disabilities.

It is important to note that students with disabilities and accessibility needs can ‘outgrow’ their need for particular supports⁴⁷. The major problem at this time with inconsistent supports is that the removal of supports is often finance-based rather than needs-based, and the lack of existing structures to determine the difference between a student outgrowing the need for a support and thriving with a support is dangerous to student success.

It is not standard to remove a cane from a person who requires one when they can walk with its assistance. It should not be expected that a person with any type of disability should struggle to manage *without* supports because they thrived *with* them.

EDUCATION ASSISTANT CONTINUITY

Many parents, guardians and students with disabilities and accessibility needs themselves have reported the disruption of Education Assistant continuity as a barrier to equitable access to education. First-hand experiences illustrate the many months that are often involved in establishing an understanding between student and EA of how to effectively communicate when first assigned to each other⁴⁸.

⁴⁷ Lloyd, J. E. V., & Baumbusch, J. (2019, May 23). Special Education in British Columbia : A Population-Based Investigation [R]. doi:<http://dx.doi.org/10.14288/1.0392854>

⁴⁸ Holmes, Tracy. 2019. “Support a Matter of Continuity for Surrey’s Special Needs Students.” Surrey Now-Leader. Retrieved September 20, 2021 (<https://www.surreynowleader.com/news/support-a-matter-of-continuity-for-surreys-special-needs-students/>).

We propose the implementation of a formal process to be used in consultation with parents/guardians and students to decide on EA continuity.

When a child with accessibility needs grows to trust an EA, it can be traumatic to have that relationship stopped out of the blue, and traumatic again to have to expend the emotional and intellectual energy to express the student's own needs *again* to a new person. Students with disabilities and accessibility needs and their families work to educate every educator on their support and communication needs. This experience can often lead to burn out – not only for students and their families, but also for EAs. The school or district may expend time and money in training EAs to support specific students with specialized needs. EAs are quoted as saying that there is no time to plan, there aren't enough resources for them to rely on and they aren't being paid enough to sustain themselves (see [Increased funding to Educational Assistants](#))⁴⁹. Shifting EAs from student to student yearly and in some cases several times daily is an inefficient way of allocating resources that endangers not only student success, but student wellbeing. The Greater Victoria School District Superintendent is quoted publicly stating that

“ ... if a parent hears directly that the EA that normally works with their child is not coming to work, they may decide to keep their son or daughter at home, because even if there is a replacement, that lack of consistency is sometimes difficult for the child to deal with⁵⁰.”

The Surrey Board of Education resolved in June of 2019 to establish a Letter of Understanding (LOU) which created a formal process through which families can apply for EA continuity. There are extensive limitations to this application process (including but not limited to the six month mandatory period the student must be assigned to the EA prior to the application being accepted). There have been other points of inaccessibility regarding this process; however, it does remain one of the most progressive available to parents, guardians and students. However, it still relies on parent advocacy which is not equitable.

(12.32) Positions being filled in which the Education Assistant is the primary service provider for a student(s) with a disorder within 1) the autistic spectrum (Autism, Asperger Syndrome, Pervasive Developmental Disorder – Not Otherwise Specified – PDDNOS, Rhett Syndrome, Kanner's Syndrome) or 2) meeting the criteria for the Ministry funding designation for “physically dependent with multiple needs” (as determined by the Special Education Department) will be posted on the earliest regular posting. The period during which a successful applicant may return to his or her previous position as per Article 12.23 will be thirty (30) working days unless the

⁴⁹ Clare Hennig -. CBC. n.d. “Education Assistant Shortage Due to Working Conditions, Not Lack of Training, Claims Union Representative | CBC News.” CBC. Retrieved September 20, 2021 (<https://www.cbc.ca/news/canada/british-columbia/education-assistant-shortage-working-conditions-1.4583039>).

⁵⁰ Kines, Lindsay, and Jeff Bell. 2019. “Shortage of Educational Assistants Forces Some Greater Victoria Students to Stay at Home.” *Vancouversun*. Retrieved September 20, 2021 (<https://vancouversun.com/news/local-news/shortage-of-educational-assistants-forces-some-greater-victoria-students-to-stay-at-home>).

employee proves unsatisfactory within the trial period in which case the employee will be returned to his or her former positions or unless mutually agreed to by the union and the employer. Save for this, Education Assistants in these positions will remain for at least the remainder of the school year and will not be subject to bumping by other employees during this period. The Special Education Department will review the needs of these particular students annually to see whether monthly postings are appropriate⁵¹.

The Collective Agreement of 2019 - 2022 CUPE 728 (Surrey) outlines the continuity of EA assignment for a student (under ideal circumstances, i.e. compatibility between EA and student) for the period of one school year. The pitfall to the guarantee extending only one school year goes back to the months of EA-student learning and coordination to interact effectively, which could be alleviated for optimal student success with the implementation of an accessible, formal process through which parents, guardians and students can apply to retain their EA from year to year. A set standard of practice for education assistants could pose as a solution to this obstacle (see [Education Assistant Standards of Practice](#))

CREATE ADDITIONAL DESIGNATIONS

These last two proposals would seem to contradict each other. In fact, they reflect that the parent community is not a monolith and while some feel that additional designations are the key to accessing supports, others feel that needs based funding will shift BC from the medical to the social model of disability, addressing all student needs immediately without the need for them to fit into a particular category or diagnosis.

In the current BC context, a funding model review has been completed with recommendations made, but parents and guardians are unsure if or when some of those recommendations will be implemented.

In BC, the lack of regulation for accommodations for students with accessibility needs which do not fall under the Ministry's designations has led to the creation of Individualized Education Plans (IEPs) being entirely at the discretion of individual schools. A number of diagnoses do not receive supplemental funding, such as dyslexia, dysgraphia, dyscalculia, anxiety disorders, ADHD, FASD, Down Syndrome, and any other diagnoses which fall under the categories mild intellectual disabilities (IQ between 50 - 70) (K), gifted (P), learning disorders (Q), and moderate behavioural support /mental illness (R)⁵².

A salient example being the declassification of ADHD as a designation, we will largely be discussing the impact of the declassification of ADHD as a designation throughout this section.

⁵¹ Surrey Schools Leadership in Learning. n.d. "COLLECTIVE AGREEMENT 2019 - 2022."

⁵² Anon. n.d. "K-12 Funding - Special Needs." Retrieved September 20, 2021.

(<https://www2.gov.bc.ca/gov/content/education-training/k-12/administration/legislation-policy/public-schools/k-12-funding-special-needs>).

BC's ministry of education has recognized ADHD as it is classified in the DSM-5, a neurological disorder rather than a behaviour disorder. However, the continued lack of a Ministry of Education designation of ADHD under the "special needs" funding tiers itself is indicative of other risk factors for student success.

At this time, we do not have reliable data regarding the prevalence of ADHD in BC as there exists no central database, nor does the long-form census inquire regarding any disability. What we do know, is that when a designation is established for a disability, that disability receives validation and is provided with more support⁵³. Parents, guardians and the students themselves often find it difficult to to advocate for the supports needed, as put by one parent who reported their experience to the BCEdAccess Exclusion Tracker

"We have been previously guilted that his support is coming out of other children's funding because we don't have a diagnosis. We don't have a previous relationship with the IST as she was new to the school in January. I don't know how hard we can push without damaging our relationship with the school....⁵⁴"

The Ministry of Education's Policy for Student Success states that it is guided by "evidence-driven and innovative practices⁵⁵," and the application of IEPs to students with ADHD is evidence-driven, though so commonplace in other provinces it can not be called innovative. Of the thirteen provinces and territories in Canada, only British Columbia, Ontario and Quebec do not list ADHD as a "special needs" designation⁵⁶. The following provinces and territories are currently ahead of BC in the designation of ADHD: Alberta, Manitoba, New Brunswick, Newfoundland and Labrador, Nova Scotia, Ontario, Prince Edward Island, Saskatchewan, Northwest Territories, Nunavut, and Yukon.

The Policy for Student Success⁵⁷ places great emphasis on student-centered learning, on student success, and "provincial-level consistency in policy design"⁵⁸. In the case of ADHD, equitable access to education has been left to the discretion of individual schools. Students with ADHD are 3x more likely to drop out of highschool than students without, and on average incur an 8-10% grade decline over a four year period when they are not provided the supports they require – despite consistently maintaining average or

⁵³ CADDAC. 2017. "Inequitable Access to Education for Canadian Students with ADHD."

⁵⁴ BCEdAccess Society. 2021. "Discrimination By The Numbers: A BCEdAccess Exclusion Tracker Report."

⁵⁵ Anon. 2021. "Policy for Student Success Educated Citizens Who Thrive in a Rapidly Changing World." Retrieved September 20 2021.
(https://www2.gov.bc.ca/assets/gov/education/administration/kindergarten-to-grade-12/understanding_the_bc_policy_for_student_success.pdf).

⁵⁶ CADDAC. 2017. "Inequitable Access to Education for Canadian Students with ADHD."

⁵⁷ Anon. 2021. "Policy for Student Success Educated Citizens Who Thrive in a Rapidly Changing World." Retrieved September 20 2021.
(https://www2.gov.bc.ca/assets/gov/education/administration/kindergarten-to-grade-12/understanding_the_bc_policy_for_student_success.pdf).

⁵⁸ Anon. 2021. "Policy for Student Success Educated Citizens Who Thrive in a Rapidly Changing World." Retrieved September 20 2021.
(https://www2.gov.bc.ca/assets/gov/education/administration/kindergarten-to-grade-12/understanding_the_bc_policy_for_student_success.pdf).

above-average abilities to learn by definition⁵⁹. Further evidence of the detrimental effects from a disability losing designation, ceases to be diagnosed or addressed can be observed in the Ministry of Education's BC Education Fact Sheet, where the number of Gifted diagnosis decreased by 10,236 after the elimination of the ADHD designation⁶⁰.

Equitable access to education is a human right, and critical to student success. Students with ADHD experience greater difficulties in executive functioning (see [Table 2](#)), which means they need additional support to access their education, a foundational reason for providing an IEP to students with other disabilities and accessibility needs. Students with ADHD who do receive a Ministry of Education designation are usually assigned an H, which is for Moderate Behaviour Support/ Mental Illness. The common misconception that ADHD is a behavioural disorder is harmful, and its treatment as such in standardized institutions is harmful to the success of students with ADHD⁶¹. This cannot be left to the discretion of each individual school any longer.

We ask you to urge the BC government to follow the lead of the Ontario Ministry of Education, to establish policy which recognizes the importance of creating a climate of understanding and mutual respect for the dignity and worth of each person, so that each person can contribute fully to the development and well-being of the community and the Province...School is the place where most children have their first interaction with a government institution or system. What students learn and experience in school will shape their perceptions – and expectations – of all other government systems. If students get the right start, they will learn to respect and support one another. They will feel included and see other government systems as supports, not barriers. Getting the wrong start in education can predispose children to think government systems and social services do not serve their interests, or even that they are designed specifically to entrench power and privilege, and maintain the status quo. This can lead to broader mistrust, suspicion, and exclusion from society⁶².

We propose that the Ministry of Education reassess the lack of designation classifications associated with many conditions to increase student success in B.C.; in particular but not limited to ADHD, to provide equitable access to education for all students under their charge.

⁵⁹ CADDAC. 2017. "Inequitable Access to Education for Canadian Students with ADHD."

⁶⁰ BCTF. n.d. "BC Education Facts."

⁶¹ CADDAC. 2017. "Inequitable Access to Education for Canadian Students with ADHD."

⁶² Ontario Human Rights Commission. n.d. "Policy on Accessible Education for Students with Disabilities | Ontario Human Rights Commission." Retrieved September 20, 2021 (http://www.ohrc.on.ca/en/policy-accessible-education-students-disabilities#_ftn11).

CREATE NEEDS-BASED FUNDING

As mentioned above, this ask would seem to contradict the previous one seeking more individual designations for students. For parents who feel this is the path forward, they feel that the current funding model based on a disabled student's diagnosis is convoluted and ineffective. Despite receiving funding to aid with their education and the ultimate goal of graduation, disabled students continue to have worse outcomes in terms of graduation compared to their non-disabled peers. For 2016/2017 six year completion rates were just 69% for disabled students across BC, which is well under the 87% completion rate seen among all funded students in B.C.'s K-12 education system⁶³. It can be clearly inferred that any additional support students with disabilities and accessibility needs receive through allocated funding based on diagnosis does not provide enough support for them to meet the six year completion rate.

The current funding model only creates additional barriers for students with disabilities and accessibility needs, as there is a misalignment between student-diagnoses, and the services required to meet students' needs and allocated funding. This is especially prevalent when a student's diagnosis falls outside of the defined supplemental funding categories.

We propose a change to the funding model to provide comprehensive support to disabled students, where funding should be allocated based on need instead of a flat amount of supplemental funding based on only certain medical diagnoses.

The funding allocation also needs to be increased to truly be able to meet all the needs of students with and without diagnosed disabilities, as there are many students with additional accessibility needs who are awaiting assessment or are simply undiagnosed.

⁶³ Government of Canada. 2018. "Improving Equity and Accountability Report of the Funding Model Review Panel."

The most prominent call to action to which this proposal responds is accountability. We have constructed and substantiated each proposal through the lens of heightened accountability – to highlight the agency, autonomy and equity of the chronically underserved students of British Columbia with disabilities and accessibility needs. We want to highlight in our conclusion the disparities not only within the province of British Columbia, but between British Columbia and the provinces of Nova Scotia, Ontario and Manitoba – the most salient example being the disparity between British Columbia’s per-student funding and the national average (See [Figure 7](#)). Other provinces in Canada serve as role models to British Columbia in the equity the Ministry of Education strives to achieve.

Our budgetary proposal outlines the problem areas in British Columbia that are currently most inequitable. Which consists of four structural budgetary proposals: an Audit of Outcomes for Disabled Students, Education Assistant Standards of Practice, Increased Psycho-Educational Assessments, and Increased Funding To Educational Assistants; and our seven proposed changes are: Create stronger Policy Language to Affirm that Equitable Access to Education Education is a Human Right, Teacher Training – Anti-Ableism, Accessibility and Anti-Racism, Administrator Training – Anti-Ableism, Accessibility and Anti-Racism, Accessibility and Anti-Racism Training, Continued Support, Education Assistant Continuity, Create Additional Designations, Create needs-based funding.

The Structural Proposals have the potential to change the experience of what it is to be a student with disabilities and accessibility needs in Canada in a critical, systemic manner. The Non-Structural Proposals likewise have the potential to change the experience of existing as a disabled student within B.C.’s education system, and require smaller adaptations to already existing structures. Both the structural and non-structural proposals would have a notable positive impact on student success for the children and youth of British Columbia, while integrating equity for racialized students with and without disabilities or accessibility needs. We implore the Committee to recommend action on these proposals.

<i>Funding Level</i>	<i>Funding Amount</i>
Students with Special Needs, Level 1	\$44,850.00
Students with Special Needs, Level 2	\$21,280.00
Students with Special Needs, Level 3	\$10,750.00

TABLE 1

Estimated Operating Grants for 2021-2022⁶⁴.

DSM-5

Disorder Class: Neurodevelopmental Disorders

- A. A persistent pattern of inattention and/or hyperactivity-impulsivity that interferes with functioning or development, as characterized by (1) and/or (2):

1. Inattention: Six (or more) of the following symptoms have persisted for at least 6 months to a degree that is inconsistent with developmental level and that negatively impacts directly on social and academic/occupational activities:

Note: The symptoms are not solely a manifestation of oppositional behavior, defiance, hostility, or failure to understand tasks or instructions. For older adolescents and adults (age 17 or older), at least five symptoms are required.

- a. Often fails to give close attention to details or makes careless mistakes in schoolwork, at work, or during other activities (e.g., overlooks or misses details, work is inaccurate).
- b. Often has difficulty sustaining attention in tasks or play activities (e.g., has difficulty remaining focused during lectures, conversations, or lengthy reading).
- c. Often does not seem to listen when spoken to directly (e.g., mind seems elsewhere, even in the absence of any obvious distraction).
- d. Often does not follow through on instructions and fails to finish schoolwork, chores, or duties in the workplace (e.g., starts tasks but quickly loses focus and is easily sidetracked).
- e. Often has difficulty organizing tasks and activities (e.g., difficulty managing sequential tasks; difficulty keeping materials and belongings in order; messy, disorganized work; has poor time management; fails to meet deadlines).

⁶⁴ Anon. n.d. "2021/22 Estimated Operating Grants." Retrieved (<https://www2.gov.bc.ca/gov/content/education-training/k-12/administration/resource-management/k-12-funding-and-allocation/operating-grants/k12funding-21-22>).

- f. Often avoids, dislikes, or is reluctant to engage in tasks that require sustained mental effort (e.g., schoolwork or homework; for older adolescents and adults, preparing reports, completing forms, reviewing lengthy papers).
 - g. Often loses things necessary for tasks or activities (e.g., school materials, pencils, books, tools, wallets, keys, paperwork, eyeglasses, mobile telephones).
 - h. Is often easily distracted by extraneous stimuli (for older adolescents and adults, may include unrelated thoughts).
 - i. Is often forgetful in daily activities (e.g., doing chores, running errands; for older adolescents and adults, returning calls, paying bills, keeping appointments).
2. Hyperactivity and impulsivity: Six (or more) of the following symptoms have persisted for at least 6 months to a degree that is inconsistent with developmental level and that negatively impacts directly on social and academic/occupational activities:

Note: The symptoms are not solely a manifestation of oppositional behavior, defiance, hostility, or a failure to understand tasks or instructions. For older adolescents and adults (age 17 or older), at least five symptoms are required.

- a. Often fidgets with or taps hands or feet or squirms in seat.
 - b. Often leaves seat in situations when remaining seated is expected (e.g., leaves his or her place in the classroom, in the office or other workplace, or in other situations that require remaining in place).
 - c. Often runs about or climbs in situations where it is inappropriate. (Note: In adolescents or adults, may be limited to feeling restless).
 - d. Often unable to play or take part in leisure activities quietly.
 - e. Is often “on the go” acting as if “driven by a motor” (e.g., is unable to be or uncomfortable being still for extended time, as in restaurants, meetings; may be experienced by others as being restless or difficult to keep up with).
 - f. Often talks excessively.
 - g. Often blurts out an answer before a question has been completed (e.g., completes people’s sentences; cannot wait for turn in conversation).
 - h. Often has trouble waiting his/her turn (e.g., while waiting in line).
 - i. Often interrupts or intrudes on others (e.g., butts into conversations, games, or activities; may start using other people’s things without asking or receiving permission; for adolescents and adults, may intrude into or take over what others are doing).
- B. Several inattentive or hyperactive-impulsive symptoms were present before age 12 years.

- C. Several inattentive or hyperactive-impulsive symptoms are present in two or more settings, (e.g., at home, school or work; with friends or relatives; in other activities).
- D. There is clear evidence that the symptoms interfere with, or reduce the quality of, social, school, or work functioning.
- E. The symptoms do not occur exclusively during the course of schizophrenia or another psychotic disorder and are not better explained by another mental disorder (e.g., mood disorder, anxiety disorder, dissociative disorder, personality disorder, substance intoxication or withdrawal).

TABLE 2

An Excerpt from the DSM-5 describing the clinical diagnosis of ADHD.

Code	Description	Funding Level	Incidence
A	Physically Dependent	Level 1	Low
B	Deafblind		
C	Moderate to Severe Profound Intellectual Disability	Level 2	Low
D	Physical Disabilities or Chronic Health Impairments		
E	Visual Impairment		
F	Deaf or Hard of Hearing		
G	Autism Spectrum Disorder		
H	Intensive Behaviour Interventions/ Serious Mental Illness	Level 3	Low
K	Mild Intellectual Disability	Basic per-student allocation only. No supplemental funds.	High
P	Gifted		
Q	Learning Disabilities		
R	Moderate Behaviour Support / Mental Illness		
Z*	All designations combined (A through R, inclusive)	--	--

TABLE 3

An Excerpt from Special Education in British Columbia : A Population-Based Investigation⁶⁵.

⁶⁵ Lloyd, J. E. V., & Baumbusch, J. (2019, May 23). Special Education in British Columbia : A Population-Based Investigation [R]. doi:<http://dx.doi.org/10.14288/1.0392854>

Average Education Assistant Pay Per Hour By District

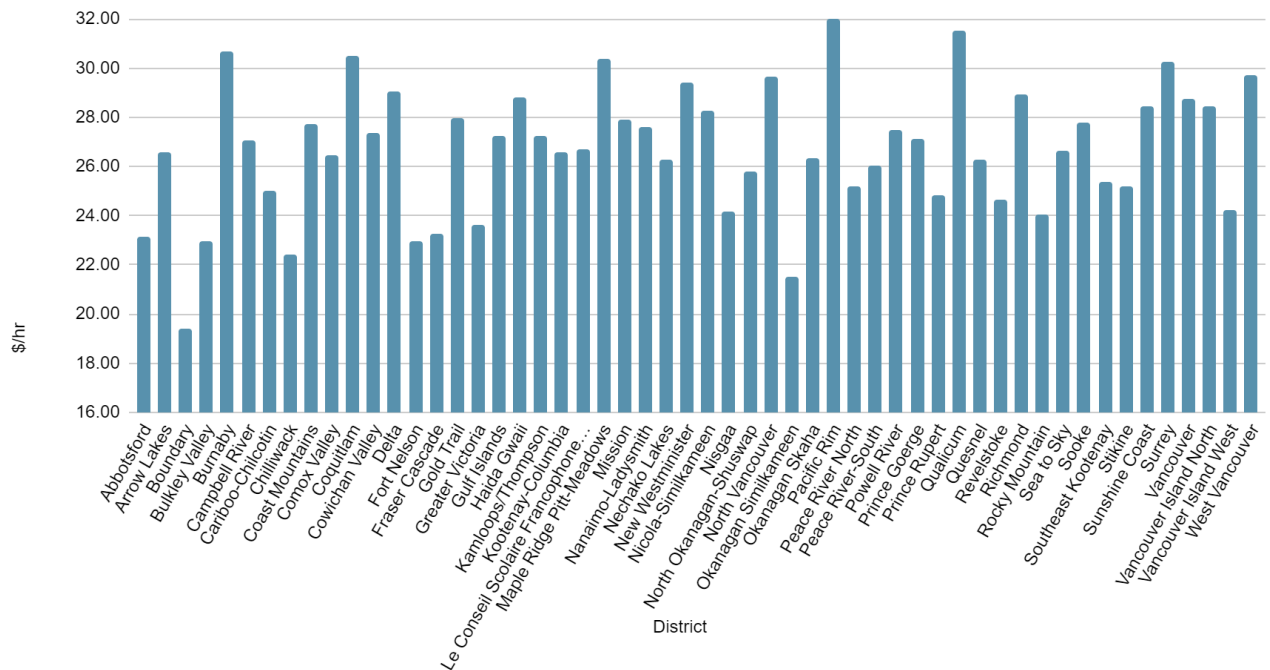


FIGURE 1

The average hourly pay rates by district, for all categorizations of Education Assistant. Data was collected from the Collective Agreements Support Staff Wage Schedule⁶⁶.

⁶⁶ gssi. n.d. "Wage Schedules." BC Public School Employers' Association. Retrieved September 20, 2021 (<https://bcpsea.bc.ca/support-staff/collective-agreements/wage-schedules/>).

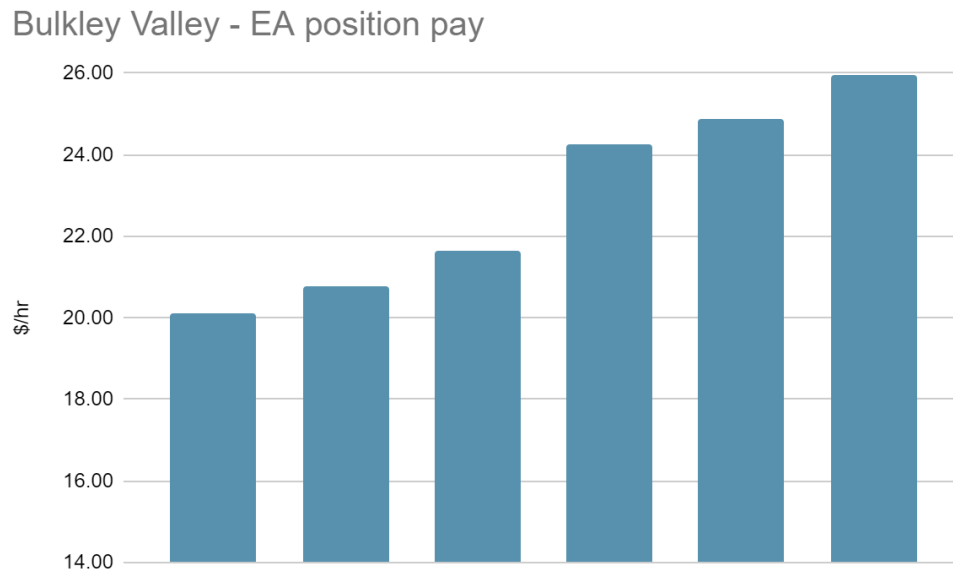


FIGURE 2

The hourly pay rates for open EA positions in the district of Bulkley Valley. Data was collected from the Collective Agreements Support Staff Wage Schedule.

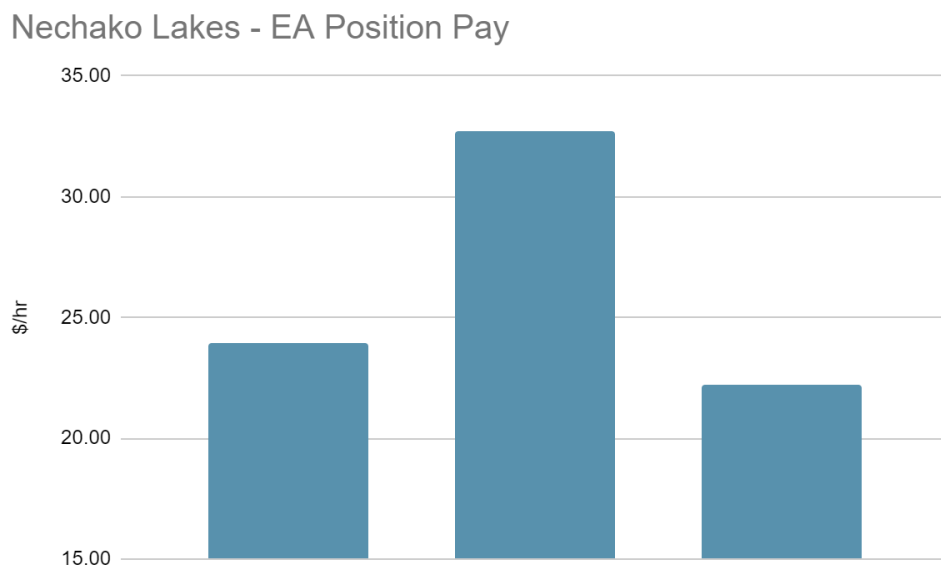


FIGURE 3

The hourly pay rates for open EA positions in the district of Nechako Lakes. Data was collected from the Collective Agreements Support Staff Wage Schedule.

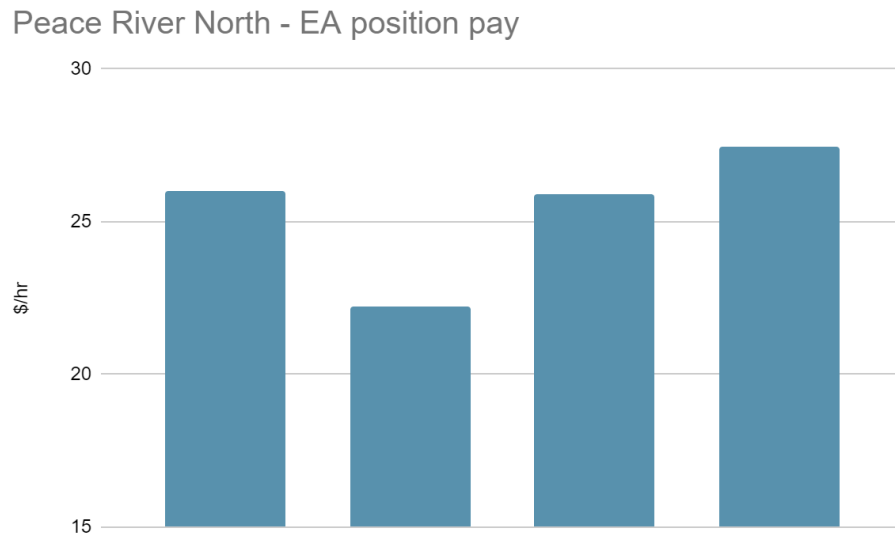


FIGURE 4

The hourly pay rates for open EA positions in the district of Peace River, North. Data was collected from the Collective Agreements Support Staff Wage Schedule.

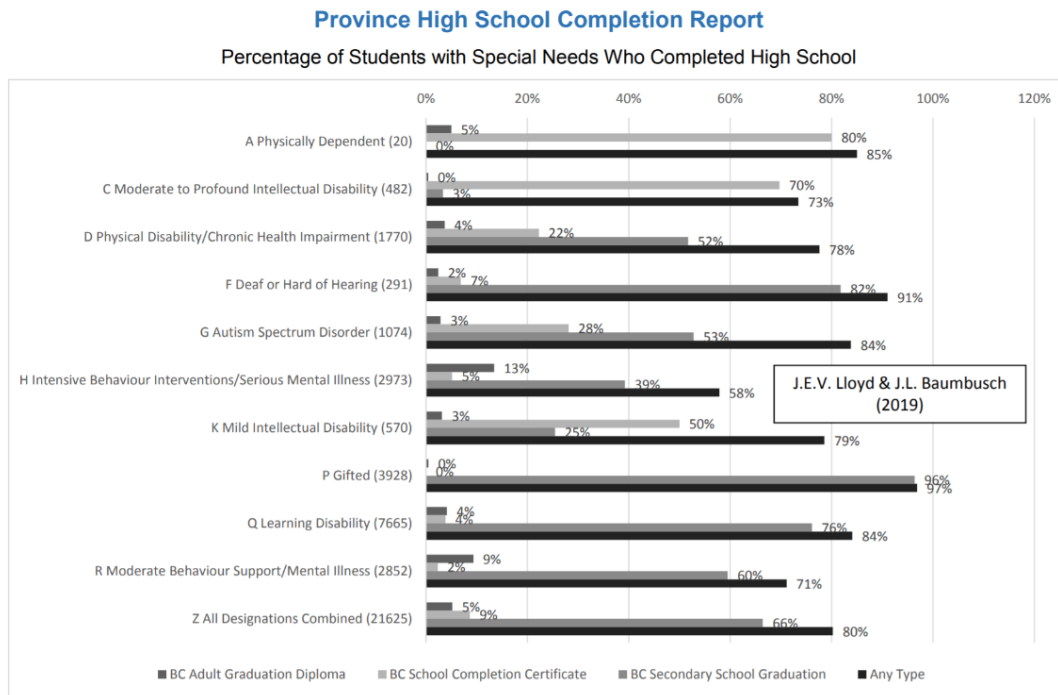


FIGURE 5

An excerpt from *Special Education in British Columbia : A Population-Based Investigation*; detailing the graduation rates of students with disabilities and accessibility needs across BC⁶⁷.

⁶⁷ Lloyd, J. E. V., & Baumbusch, J. (2019, May 23). *Special Education in British Columbia : A Population-Based Investigation* [R]. doi:<http://dx.doi.org/10.14288/1.0392854>

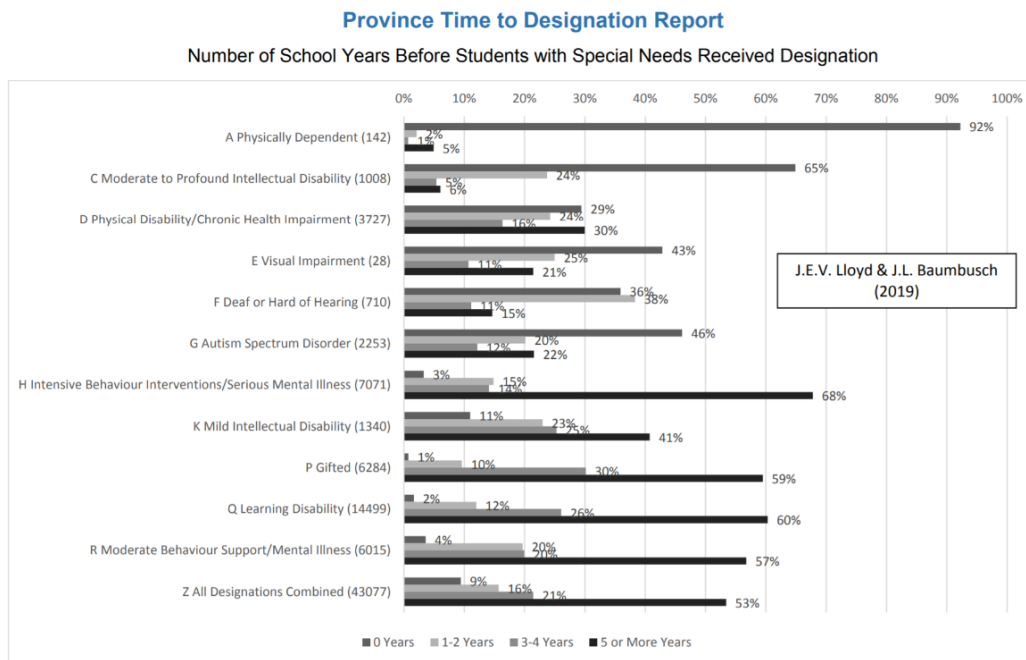


FIGURE 6

An excerpt from *Special Education in British Columbia : A Population-Based Investigation*; detailing the amount of time (years) before students with special needs receive their designation, on average, across BC⁶⁸.

⁶⁸ Lloyd, J. E. V., & Baumbusch, J. (2019, May 23). *Special Education in British Columbia : A Population-Based Investigation* [R]. doi:<http://dx.doi.org/10.14288/1.0392854>

B.C.'s per student education funding over time, compared to the national average

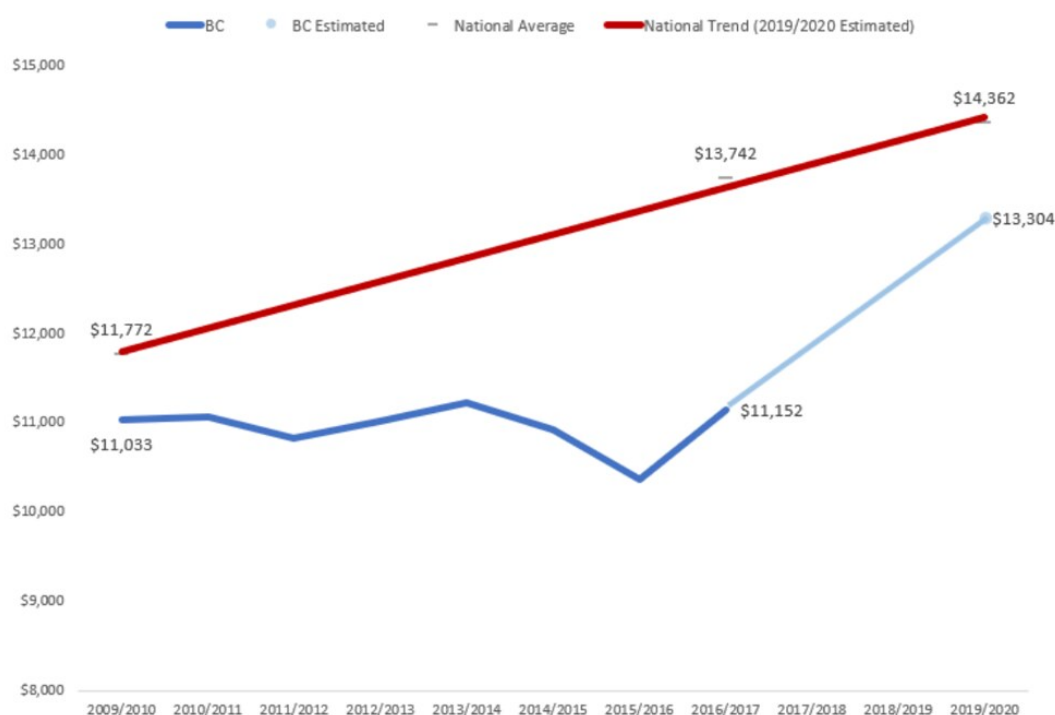


FIGURE 7

An excerpt from B.C. students benefiting from more per-student funding, on average, across BC⁶⁹ showing that BC is \$1,058.00 below average in per-student funding.

⁶⁹ Education. 2019. "B.C. Students Benefiting from More per-Student Funding | BC Gov News." Retrieved September 22, 2021 (<https://news.gov.bc.ca/factsheets/bc-students-benefiting-from-more-per-student-funding>).



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