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## BCDLAA Response to *Improving Equity and Accountability (2018)*

The British Columbia Distributed Learning Administrator's Association (BCDLAA) is an organization established in 2010 "to coordinate and promote the interests of Public Distributed Learning in the province of British Columbia in all its facets" (BCDLAA Constitution, 2011). Throughout its history, the organization has committed itself to working with the Ministry of Education, districts and schools to promote the evolution of innovative pedagogy and education models, increase student choice, and tailor students' educational programming to best suit their needs.

The purpose of this document, which is a response to recommendations impacting distributed learning throughout the province found in [\*Improving Equity and Accountability \(2018\)\*](#), is fourfold:

- Introduce questions needing to be answered prior to policy formation and implementation;
- Highlight opportunities inherent in the recommendations and suggest actions to be considered to maximize recommendation potential;
- Outline unforeseen and potentially negative consequences needing to be addressed;
- Introduce areas needing further consideration or exploration.

As we examined the recommendations that we believe most significantly impact DL, we kept the following considerations in mind:

- Equity for all students (vulnerable, complex, those wanting to accelerate, those who need longer than a standard semester or linear year to complete a course, those needing to upgrade or repeat, those needing a flexible schedule to provide options for life outside of school – competitive athletes, performing artists, those whose schools or timetables cannot accommodate desired courses, etc.);
- Aspects of Equity – access to programs, quality of courses, options for programming, support for special needs;
- The need for schools of first choice and last resort;
- Preservation of Personalization;
- Improving Equity and Accountability Document statements;
  - General comments in Executive Summary (p. 5)
  - Superintendent responses to review committee (p. 26)
- Prioritizing the impact/importance/implementation of the recommendations;
- Implementation timeline and approach – staffing considerations, facilities, course assets, student transition/completion considerations.

RECOMMENDATION	<b>Recommendation 9:</b> <i>The Ministry should base funding allocations for school-aged educational programming on the number of students, rather than on the number of courses taken. The Ministry should phase out the current course-based funding model by the 2020/2021 school year.</i>	
Underlying Assumptions of Recommendation	<ul style="list-style-type: none"> <li>• Student numbers are more predictable year-to-year than are the number of courses individual students will choose to take</li> <li>• Greater predictability will create greater stability for the province and districts to engage in budgeting processes</li> </ul>	
Interests of Recommendation to be Achieved	<ul style="list-style-type: none"> <li>• Predictable funding flow to school districts should result in greater stability and better ability to plan on part of the district and individual schools</li> <li>• Budget predictability for the Ministry</li> </ul>	
Issue/Topic #1  Will students continue to have the option of taking Distributed Learning courses from their <b>local</b> DL school?	Considerations needing further exploration:	<ul style="list-style-type: none"> <li>• K-7, 8-9 and 10-12 DL learners have different needs, and local DL programs respond to the nuances of those needs.</li> <li>• How will Independent DL schools fit into the provincial picture? <ul style="list-style-type: none"> <li>○ How will funding work? (course-based?)</li> <li>○ How will catchment/district boundary rules apply?</li> </ul> </li> <li>• How will career education and apprenticeship programs and dual credit partnerships run in districts that currently over- enroll students per current rules?</li> </ul>
	Potential Consequences to Mitigate:	<ul style="list-style-type: none"> <li>• Predicting the number of DL students and setting aside staffing/funding to accommodate will fall to local HR and Union rules.</li> <li>• Districts may opt out of providing a local DL option because they do not currently accommodate full "School-of-record" students – they only provide single-course service, which is made possible through course-based funding. This could have an impact on equity.</li> <li>• If local DL schools no longer exist (i.e. there is no longer a DL agreement), school districts will be left to negotiate with the centralized/regionalized DL schools which will impact equity – some will partner, some won't.</li> </ul>
	Opportunities to Optimize:	<ul style="list-style-type: none"> <li>• Infrastructure, staffing and programs are already in place in many districts that provide "in-house" DL for home district students.</li> <li>• Local districts have evolved to cope with local needs (students and staffing) – transferring this institutional knowledge of student needs and the institutional operations will be a huge task, whether it is to a centralized model or a local model with a new funding formula.</li> </ul>

<p>Issue/Topic #2</p> <p><b>Under/Over Enrollment</b> - If a student needs to take more (or fewer) than 8 courses a year, Districts will need to either provide at cost or reimburse as needed.</p>	<p>Considerations needing further exploration:</p>	<ul style="list-style-type: none"> <li>• Students with mental health issues often turn to DL to pick up a single course at a time; will they be required to take a full course load? or will districts reimburse the Ministry for courses not taken that year?</li> <li>• Currently, K-9 is funded on a per student basis with a four-course threshold of engagement. Is this the number of courses that would trigger a DL FTE 10 – 12? If so, what will that mean for our vulnerable learners who cannot manage more than one or two courses at a time? <ul style="list-style-type: none"> <li>○ Course-based funding fosters flexibility; students who are close to leaving school often need a small step toward success – one or two courses – to encourage them to get back into school.</li> </ul> </li> </ul>
	<p>Potential Consequences to Mitigate:</p>	<ul style="list-style-type: none"> <li>• Students often change their minds about courses (the number, which subjects, face-to-face or online), for many reasons (success issues, changes of post-secondary requirements, changes in availability). How will this be managed in an FTE model?</li> <li>• Students who cannot manage more than one course would need to be classified as Alternate Education students – not necessarily appropriate if they are doing DL programming.</li> <li>• Flexibility of programming is compromised – for example... <ul style="list-style-type: none"> <li>○ College nursing program requirements have increased to include four Gr. 11/12 sciences, while at the same time the Ministry has added a required Grade 11/12 four-credit course (CLC) - schools have less ability to be responsive to student needs based on external requirements when course-based funding is removed.</li> <li>○ Large high schools offer programs like leadership, band and choir outside of the block schedule, often as 9<sup>th</sup> and 10<sup>th</sup> courses. If these are suddenly funded as part of a student’s FTE (8 courses), this will result in considerable loss of elective options in schools; seniority and union rules will cause an upheaval and shift in expertise in teaching areas as experienced elective teachers are forced</li> </ul> </li> </ul>

		to teach something outside of their expertise. Furthermore, students will suffer with far fewer elective choices.
	Opportunities to Optimize:	<ul style="list-style-type: none"> <li>• If students get ‘full time’ status at the district level, above some threshold or course minimum, how will students taking online courses in a regional or central DL program get funded? How can we maximize the ‘local’ expertise in current DL schools in a model that would be funded and staffed appropriately?</li> </ul>
<p>Issue/Topic #3</p> <p>Continual Entry and Exit allows students the flexibility to work year-round on their courses.</p>	Considerations needing further exploration:	<ul style="list-style-type: none"> <li>• How will districts continue to provide continual entry within a block funded model? (10-month vs 12-month structures)</li> <li>• Revised curriculum encourages individualization – returning to mandated September – June scheduling does not honour this shift</li> <li>• If we transition to a regional program, when do we stop taking continual entry students? How do we insure continuity in their programs as they finish courses? What will replace this in the interim to support new students?</li> </ul>
	Potential Consequences to Mitigate:	<ul style="list-style-type: none"> <li>• Current role of DL to support students who need more (or less) time to achieve course outcomes than typical semester- or year-round scheduling allows.</li> <li>• Reduced opportunity for students to upgrade.</li> </ul>
	Opportunities to Optimize:	<ul style="list-style-type: none"> <li>• How do we continue to support continually entry if we do not have additional funding to support courses when students sign up after budgets are allocated? How do we continue to provide timely personalized learning beyond following the traditional start dates of regular schools?</li> </ul>

RECOMMENDATION	<b>Recommendation 10:</b> <i>with a shift to a per-student-based funding model, the Ministry should develop a new policy and program delivery model for Distributed Learning to ensure consistent access to quality programming for all students in the province.</i>	
Underlying Assumptions of Recommendation	<ul style="list-style-type: none"> <li>• Current model of multiple schools/service providers in the province does not provide consistent access to quality programming to all students.</li> <li>• A single/centralized program (or smaller number of regional programs) will ensure that all BC students have access to the same level of quality.</li> </ul>	
Interests of Recommendation to be Achieved	<ul style="list-style-type: none"> <li>• That all students have equitable access to DL opportunities</li> <li>• That the province can be confident that all students have quality programming/courses available to them</li> </ul>	
Issue/Topic #1  Document comments re, Superintendent responses to review committee (p.26)	Considerations needing further exploration:	<ul style="list-style-type: none"> <li>• “...<i>Distributed Learning in its current form is not working...</i>” <ul style="list-style-type: none"> <li>○ What constitutes “not working”? Are we talking about <b>operations</b> or <b>student outcomes</b>? Which should be the bigger concern?</li> </ul> </li> <li>• Focusing on DL as a means for “revenue generation” (in some districts) removes the legitimacy of the “variety of reasons” schools provide service beyond district borders and devalues service DL provides to students. <ul style="list-style-type: none"> <li>○ Note – the “revenue generation” idea stems from the days of markers – it is not a reality in most places today, with teachers hired to run programs (even in the original nine regional schools)</li> </ul> </li> </ul>
	Potential Consequences to Mitigate:	<ul style="list-style-type: none"> <li>• Current statistics indicate that DL six-year graduation rates are below provincial averages for students who take 2 or fewer DL courses; however, the statistics do not take into account that a significant number of the students who graduate from a DL school come to the school as a result of NOT finishing at their neighbourhood school – who will provide service to those learners who are vulnerable to leaving school altogether? And what will happen to the provincial rates if the local DL school is not available to them?</li> <li>• Statement (<i>Distributed Learning in its current form is not working</i>) = throwing the baby out with the bathwater... it is working for many students in many ways; how will we retain/recover what is good in the present</li> </ul>

		system and which honours the personalized learning agenda in the revised BC Curriculum?
	Opportunities to Optimize:	<ul style="list-style-type: none"> <li>• How do we optimize and take advantage of local learning centres and support structures that are already successful in helping students graduate or upgrade to become more productive citizens?</li> </ul>
Issue/Topic #2  If we move to a single-source or regional model, some form of process for funding will need to be established.	Considerations needing further exploration:	<ul style="list-style-type: none"> <li>• Would a single-source provider (I.e. a single provincial DL school have its own funding?)</li> <li>• If a student takes a DL course from a non-funded, non-district provider (single-source or regional, outside of district) then school districts may have to withhold some block funding to cover this cost, depending on what funding model is designed. <ul style="list-style-type: none"> <li>○ Predicting how many students will elect to withdraw from a brick and mortar class and elect a DL option after staff/class levels have been set will affect staffing processes.</li> <li>○ Having funds set aside for potential DL spending has the potential to decrease flexibility WITHIN the district, and districts will be less nimble to provide programs to students (I.e., will there be programming options, or will they simply be given a DL course?)</li> </ul> </li> <li>• If regional, will geography play a role in determining which schools partner with which regional provider? (Another equity question...)</li> <li>• Will there be an independent school model that continues alongside a regional model? If so, will they be exempt from regional restrictions giving them an unfair advantage to poach students from the provincial model?</li> <li>• Will there be consideration of regional differences since the needs and support structures are significantly different for rural vs urban areas?</li> </ul>
	Potential Consequences to Mitigate:	<ul style="list-style-type: none"> <li>• Unpredictable funding requirements from a central/regional model (if not funded separately).</li> <li>• Concerns about System Adaptation at the provincial and local levels – there are concerns about changing too much too quickly <ul style="list-style-type: none"> <li>○ Example – staffing may need to be redistributed which could be an issue</li> </ul> </li> </ul>

		<p>because of local union contract language</p> <ul style="list-style-type: none"> <li>• Currently, there are many models and many schools of varying size – the costs/benefits of change to each district would vary considerably, depending on the role the local DL school plays in the district and the needs of students in each district.</li> </ul>
	Opportunities to Optimize:	<ul style="list-style-type: none"> <li>• How will expertise in DL teaching and delivery be leveraged within current models so that this expertise is not lost in the new model?</li> </ul>
Issue/Topic #3	Considerations needing further exploration:	<ul style="list-style-type: none"> <li>• DL is often used to support vulnerable students; keeping students in-district allows for a more collaborative approach between DL and neighbourhood schools in addressing student needs. Development of relationships needed for transitioning vulnerable students back into their local school.</li> </ul>
<p>A single source or regional provider will make it more difficult to support relationship development for vulnerable students</p> <p><i>How will a centralized or regional DL school provide this same relationship piece.?</i></p>	Potential Consequences to Mitigate:	<ul style="list-style-type: none"> <li>• Students who require intensive support will still need to be provided with service – not all who require such support can attend a neighbourhood school. How will this be handled in the new policy?</li> <li>• Neighbourhood supports, programs, and resources have been developed for local population needs; these have the potential to be lost in a centralized model.</li> </ul>
	Opportunities to Optimize:	<ul style="list-style-type: none"> <li>• How will local support structures that meet the needs of vulnerable students be improved or enhanced (rather than reduced) by the new model?</li> </ul>
Issue/Topic #4	Considerations needing further exploration:	<ul style="list-style-type: none"> <li>• There are many models in the field now – who decides which models are optimum, and how would they need to be adopted into a provincial or regional system?</li> <li>• Who will be responsible for curating/building/maintaining a central/regional system, and what will be the timeline for setting it up? (i.e. “Do it fast or do it right.”)</li> <li>• What will the model look like – a single mandated course or a standardized “base” version of a course that can be molded to meet local needs (resulting in the same variance of quality as we currently have?)</li> <li>• How is the current difference in courses offered (concern about equity and quality) any different from what is delivered in two classrooms by two</li> </ul>

		different teachers? How does teacher autonomy play into this?
	Potential Consequences to Mitigate:	<ul style="list-style-type: none"> <li>• Significant investment in course and program development over the last three years (with revised curriculum) will be lost if a single course at each level is chosen as “the provincial standard”. How will schools/districts be compensated for these investments?</li> <li>• A great deal of local expertise has been created across the province – how will the best of DL be recorded and preserved so that whatever model we move to, we do not lose that expertise? <ul style="list-style-type: none"> <li>○ Ex. DL is the source of many innovative and place-based programs that would not exist had it not been for current funding models which allowed for the development and offering of these program options.</li> </ul> </li> <li>• How will student choice and interest (Personalization) be honoured in a system that uses a single course in the interest of equal quality access?</li> </ul>
	Opportunities to Optimize:	<ul style="list-style-type: none"> <li>• How do we maintain local expertise and local advantages in providing personalized learning to students in our own districts?</li> </ul>
Issue/Topic #5  If we centralize/regionalize DL to “ensure consistent access to quality programming” it does not guarantee equity.	Considerations needing further exploration:	<ul style="list-style-type: none"> <li>• A centralized/regionalized service provider will not have the same presence in the lives of students as a local DL school can have – DL schools and programs provide options for families who want to have the ability to be intimately involved in their child's education but who also want the structure of a curriculum, guided and assessed by BC-certified teachers (I.e., part of the community that raises the child...)</li> </ul>
	Potential Consequences to Mitigate:	<ul style="list-style-type: none"> <li>• Creating a more equitable service is desirable, but how do we do this without moving to an ‘average’ of services that reduces services significantly in areas that are doing it well?</li> </ul>
	Opportunities to Optimize:	<ul style="list-style-type: none"> <li>• Will the new DL model take into consideration the offerings of current DL programs that are working well to provide personalization and choice? How can we create a provincial/regional program that brings everyone to the level of the best that we currently offer, rather than averaging to something less?</li> </ul>



RECOMMENDATION	<p><b>Recommendation 11:</b> <i>Notwithstanding Recommendation 9, funding for the following programs should remain course-based:</i></p> <ul style="list-style-type: none"> <li>• <i>Graduated adults</i></li> <li>• <i>Non-graduated adults</i></li> <li>• <i>Continuing education (adult and school-age learners)</i></li> <li>• <i>Distributed learning (for adult learners only)</i></li> <li>• <i>Summer school (school-age learners)</i></li> </ul>	
Underlying Assumptions of Recommendation	<ul style="list-style-type: none"> <li>• In general, the new funding model applies to school-age students during the regular school year; the exceptions are two acknowledged “different” populations – those school-age students who qualify for CE programming and those who take discreet summer school classes.</li> <li>• The adult education guarantee will be funded via a separate model, regardless of graduation status.</li> <li>• Some student populations are less likely to be taking courses full-time (ex – adults are expected to be working and thus attending classes part time only).</li> </ul>	
Interests of Recommendation to be Achieved	<ul style="list-style-type: none"> <li>• Differentiating between school-age and adult learners (for the purposes of differentiating funding sources?)</li> </ul>	
<p>Issue/Topic #1</p> <p>School-age students may also be unable to attend “full time” due to life situations or mental/physical health considerations.</p>	<p>Considerations needing further exploration:</p>	<ul style="list-style-type: none"> <li>• As above – what is the course number threshold for a full FTE?</li> <li>• What will be the status of Grads-under-19? Will course-based funding apply to them, or will they be subject to student-based funding?</li> </ul>
	<p>Potential Consequences to Mitigate:</p>	<ul style="list-style-type: none"> <li>• Predictability of populations during the school year – students who start out full-time may need to cut back, while students who regain health may be able to take more courses</li> </ul>
	<p>Opportunities to Optimize:</p>	<ul style="list-style-type: none"> <li>• How do we meet the needs of students with work schedules, life situations, or mental/physical health considerations, regardless of if they are school aged or adults?</li> </ul>
<p>Issue/Topic #2</p> <p>What is the rationale for these populations to be treated differently</p>	<p>Considerations needing further exploration:</p>	<ul style="list-style-type: none"> <li>• How do these “exceptions” accommodate the stated rationale for Recommendation #10? <ul style="list-style-type: none"> <li>○ <i>“to ensure consistent access to quality programming for all students in the province”</i></li> </ul> </li> <li>• While there are recommendations to regionalize or centralize DL, there are no indications to do so with Continuing Education. With CE programs offered to students over the age of 16, huge inequities can arise with far greater choice and</li> </ul>

(subject to a different funding model)?		personalization for students in districts with well-developed CE programs versus those without.
	Potential Consequences to Mitigate:	<ul style="list-style-type: none"> <li>Some of our most vulnerable students will likely be missed or under-supported if we move away from local models of DL.</li> </ul>
	Opportunities to Optimize:	<ul style="list-style-type: none"> <li>How do we ensure that some of our most vulnerable students, currently supported by strong relationships between our schools and their district DL schools are maintained and enhanced? How do we spread these kinds of positive relationships to districts and regions that have students who need this kind of support?</li> </ul>

The BCDLAA has always had a positive working relationship with the Ministry and we are thankful for the opportunity to participate in this process. While we believe there is potential to move to an improved model, the current recommendations point to considerable disruption to the current model, and as an executive we are deeply concerned that unforeseen circumstances will result in:

- A loss of local knowledge and support of DL students;
- A loss of choice and personalization both in DL offerings and in regular brick and mortar schools for our students;
- Considerable upheaval and staffing changes, with the potential loss of expertise in the teaching and delivery of DL courses and programs;
- A disruption to programs that are successfully meeting local needs of students who do not 'fit' neatly into regular schools;
- A limitation to the way we accommodate and meet the needs of very high needs students in our communities;
- A potential decrease in the Provincial graduation rate when student needs are not met in ways we currently service students within challenging populations.

Ultimately, these concerns are for our students and their ability to personalize their learning while leveraging advantages that our local DL schools provide. We do not want a new model to be implemented that will result in unforeseen consequences that hinder a district's ability to provide valuable services to students. We recognize that these recommendations suggest considerable changes to how DL will be provided to our students, and we invite further conversation with the Ministry to ensure that the concerns we have for our students are considered. In moving from recommendations to implementation, our executive hopes that we can continue to play a role in ensuring that Ministry goals with respect to DL are clearly beneficial to the students of BC, with consequences that increase, rather than decrease, personalization and student success.

Submitted with respect on behalf of the members of the BCDLAA by our executive:

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