



# Evaluation of the Elementary & Secondary Education Program

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Indigenous Services  
Canada

Services aux  
Autochtones Canada

Canada

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## List of Acronyms

**ADM** – Assistant Deputy Minister or Associate Deputy Minister

**AFN** – Assembly of First Nations

**AHSOR** – Aboriginal Head Start on Reserve

**CIRNAC** – Crown-Indigenous Relations and Northern Affairs Canada

**DG** – Director General

**ERAS** – Education Reports and Analysis Solution

**ESDC** – Employment and Social Development Canada

**ESDPP** – Education and Social Development Programs and Partnerships

**FNIHB** – First Nations and Inuit Health Branch

**IELCC** – Indigenous Early Learning and Child Care Framework

**ISC** – Indigenous Services Canada

**PHAC** – Public Health Agency of Canada

## Preamble

This evaluation covers the period between 2012 and 2018. It is important to note that transformative policy and program changes were developed at the end of the review period and are currently being implemented. Unprecedented investments of \$2.5 billion from Budget 2016 have significantly increased funding for First Nations elementary and secondary education over the last three years and have helped address a number of priority areas, including High-Cost Special Education, language and culture, and literacy.

In addition to the new investments, as of April 1, 2019, Indigenous Services Canada (ISC) implemented a new policy and funding approach that was co-developed with First Nations representatives. The goal of the new funding approach is to support First Nations education through predictable base funding that is more directly comparable to provincial systems. This new funding approach has replaced outdated proposal-based programs with improved access to predictable core funding; provided First Nations schools with \$1,500 per student, per year, for language and culture programming; provided new resources to support full-time kindergarten in First Nations schools for children ages four and five; and, made special education funding more predictable, with fewer application-based requirements.

The findings of the current evaluation need to be considered in the context of the considerable changes ISC has made to the way it funds First Nations elementary and secondary education on reserve. Any implications of these policy and program changes will need to be assessed in later evaluations.

Independent of this evaluation, the Office of the Auditor General of Canada released a performance audit in the spring of 2018 titled, “Socio-economic Gaps on First Nations Reserves – Indigenous Services Canada<sup>1</sup>.” In addition to examining progress made on closing socio-economic gaps between First Nations people on reserve and non-Indigenous Canadians, the report also examined the use of data by ISC’s education programs<sup>2</sup>. The report raised concerns with the Department’s measurement, collection, use, sharing of and reporting on First Nations’ education data and results. The Parliamentary Standing Committee on Public Accounts is overseeing the implementation of three recommendations relating to ongoing progress on the development of socio-economic gap measures; regional educational agreements; and adjustments to the Department’s Education Information System<sup>3</sup>. While different in scope, a common finding between the reports is the methodology used to calculate high school graduation rates.

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<sup>1</sup> Report 5 - Socio-economic Gaps on First Nations Reserves - Indigenous Services Canada ([https://www.oag-bvg.gc.ca/internet/English/parl\\_oag\\_201805\\_05\\_e\\_43037.html](https://www.oag-bvg.gc.ca/internet/English/parl_oag_201805_05_e_43037.html))

<sup>2</sup> Ibid

<sup>3</sup> Standing Committee on Public Accounts, 42nd Parliament, 1st Session (December 3, 2015 - September 11, 2019) (<https://www.ourcommons.ca/Committees/en/PACP/Work?show=reports&parl=42&session=1>)

## Executive Summary

The Evaluation of the Elementary and Secondary Education Program was undertaken in 2017-18, and generally examined activities and progress against stated departmental outcomes covering the period from 2012-13 to 2017-18. The evaluation was completed using a series of eight site visits in most regions in Canada (except Yukon and Atlantic), as well as 71 key-informant interviews with First Nation education administrators, ISC staff, provincial education representatives, and stakeholder groups. Additionally, a full analysis of the contents of the Education Information System, as well as an extensive literature review, was undertaken.

This evaluation specifically examined the impacts of elementary/secondary support funding, High-Cost Special Education, New Paths for Education, the First Nation Student Success Program, the Education Partnerships Program, and the First Nation and Inuit Cultural Education Centres Program, representing between approximately \$1.3 billion to \$1.5 billion per year between 2010-11 and 2016-17<sup>4</sup>.

This evaluation found that, consistent with contemporary research on the subject, the education success of First Nation students on reserve is low and is not showing broad signs of improvement. While the proportion of students who graduate while enrolled in their final year has generally been reported by ISC as less than 45 percent, when considering the students who did not make it to their final year this figure is far lower – at approximately 28 percent, varying by region from about 15 percent in Manitoba to 44 percent in British Columbia. There has not been measurable improvement over time. Generally, women outperform men, graduating at a rate of about 10 percent higher. First Nation students attending school off reserve graduate at a much higher rate than students attending school on reserve, particularly in Ontario.

The historical and community context of First Nations is such that beyond short- and long-term funding influxes, a complete restructuring of how ISC provides funds and support for First Nations education is needed. Current funding approaches do not adequately consider the lack of wrap-around services on-reserve, and the proposal-based mechanisms leave First Nations education administrations in a funding position that is highly inequitable to provincial school boards, particularly in their capacity to offer competitive compensation, and manage longer-term planning. In addition to wrap-around services, it is also important to consider that the Government of Canada's fragmentation of Early Childhood Learning from the education system on reserve is counter to internationally-recognized best practice, and is not conducive to an effective education system.

The government has pressed forward with engagements and negotiations of agreements based on the success of some regional agreements such as the British Columbia Tripartite Education Framework. It is important to acknowledge, however, that while regional

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<sup>4</sup> Student and financial data on 2017-2018 was unavailable at the time of writing.

agreements in certain contexts have shown promise, they are not solutions in and of themselves. While agreements strengthen self-determination, ongoing challenges may persist nonetheless. Extensive cooperation, investments, and capacity development must be an integral part of new approaches to First Nation education funding.

With respect to High-Cost Special Education, and special education services in general, there are significant barriers in accessing services and procuring adequate funding for students with special needs on reserve, and these barriers are greater than those typically faced off reserve. Program policies also create a somewhat arbitrary dichotomy of what does and does not constitute 'high cost' in requiring a disability to be considered 'moderate to profound,' instead of funding for assessed needs on a cost basis.

It is therefore recommended that ISC:

- 1) Work with First Nations and government partners to explore, identify, and assess specific funding gaps of elementary and secondary education for First Nations, including sufficient investments for capacity and service needs such as, parental engagement, culture and language, as well as transportation and infrastructure considerations.
- 2) Work with First Nations and government partners on an ambitious policy framework, which aims to tackle early learning gaps and service needs, including the integration of early childhood education, using more flexible funding approaches for First Nations, and taking into consideration transportation and infrastructure challenges.
- 3) Work with First Nations and government partners on a clear and comprehensive strategy to support First Nations in addressing special education needs at or beyond levels to those offered off-reserve.
- 4) Work with First Nations and other ISC sectors as appropriate to integrate trauma and healing-based approaches to education support, which contribute to restoring and strengthening pride, identity, and self-determination.
- 5) Invest in communications with regional partners and First Nations to improve relationships and understanding, and to further advance reconciliation.

## Management Response and Action Plan

**Project Title:** Evaluation of the Elementary and Secondary Education Program

### 1. Overall Management Response

#### Overview

- This evaluation covers the period between 2012 and 2018. It examines the impacts of elementary/secondary support funding, high-cost special education, New Paths for Education, the First Nation Student Success Program, the Education Partnerships Program, and the First Nation and Inuit Cultural Education Centres Program, representing between approximately \$1.3 billion to \$1.5 billion per year between 2010-11 and 2016-17.
- The findings of the evaluation need to be considered in the context of the considerable policy and program changes Indigenous Services Canada (ISC) has made and are currently being implemented. Education transformation, implemented on April 1, 2019 is the most significant change to education programming for First Nation students on reserve since the establishment of the Elementary and Secondary Education Program in the early 1970s. ISC has shifted from outdated approaches to core K-12 funding mixed with a patchwork of proposal-based programs to a new, co-developed, K-12 funding formula that provides for stable, predictable and transparent provincially-comparable funding for education on reserve. In addition to provincial comparability, the new approach includes adaptations to reflect the unique situation of First Nations (e.g. remoteness, socio-economic factors, community size) and enhancements beyond provincial comparability, such as additional investments for language and culture and full-time kindergarten.
- The findings of this evaluation are the very same issues that underpinned the calls for transformation by First Nations partners and which directly informed the Government of Canada's transformation mandate, and led to the fundamental changes to the programs covered in this evaluation.
- Transformation is completing its second year, and so any implications of these policy and program changes will need to be assessed in later evaluations. Despite the fact that the suite of programs as evaluated no longer exists, the principles of the evaluation findings will serve as a reference point for future evaluations of the new approach.

#### Assurance

- The Action Plan presents appropriate and realistic measures to address the evaluation's recommendations, as well as timelines for initiating and completing the actions.

## 2. Action Plan Matrix

Recommendations	Planned Action(s)	Responsible Manager (Title / Sector)	Planned Start/Completion Dates and Additional Context
<p>1. Work with First Nations and government partners to explore, identify, and assess specific funding gaps of elementary and secondary education for First Nations, including sufficient investments for capacity and service needs such as, parental engagement, culture and language, as well as transportation and infrastructure considerations.</p>	<p>We <b>do</b> concur. (do, do not, partially)</p>	<p>Assistant Deputy-Minister (Education and Social Development Programs and Partnerships)</p> <p>Director General (Education Branch, Education and Social Development Programs and Partnerships)</p>	<p>Start Date: 2017      Completion Date: 2019</p> <p>a) After an extensive engagement process with First Nations partners, an education transformation policy proposal was produced, endorsed by Chiefs in Assembly in 2017, and approved by Cabinet in 2018. More specifically, ISC has fundamentally transformed funding for First Nations elementary and secondary education across the country and has achieved an “equity plus” basis through provincially-comparable funding plus adaptations and enhancements (e.g. language and culture and full-day Kindergarten) that go beyond provincial comparability.</p>
	<p>a) Work with First Nations to develop and implement a transformational funding approach that achieves provincially-comparable funding.</p>		<p>Start Date: 2017      Completion Date: April 2019</p> <p>b) The identification and assessment of gaps is being conducted as a part of the annual review of the funding formula and process to update it each year in conjunction with First Nation Technical Tables. These technical tables are established and existing mechanisms to continuously identify funding gaps which, in turn, inform Budget proposal exercises to advance the priority of closing the gap. For instance, the identification, development and costing of refinements to the formula to ensure comparability was achieved in multiple regions in 2019-2020 (e.g. moving from proxies and estimates to data-driven, evidence based, co-developed refinements in areas such as transportation costs). Similar work is on-going based on the pace and priorities of partners at the regional level. Additional refinements are planned on a cyclical, annual basis through engagement sessions in Spring and Summer in time to include refinements in the turn-over of the annual formula which takes place in Fall and Winter.</p> <p>The establishment of these on-going structures is a part of transformation, and a key achievement in closing this recommendation. ISC is now able to move from establishing transformation into its ongoing, regular, maintenance and refinement.</p>
	<p>b) Develop an ongoing mechanism to assess and identify additional funding gaps beyond provincial comparability.</p>	<p>Assistant Deputy-Minister (Education and Social Development Programs and Partnerships)</p> <p>Director General (Education Branch, Education and Social Development Programs and Partnerships)</p>	<p>Start Date: 2017      Completion Date: April 2019</p> <p>c) Through the establishment of technical tables, ISC is working with partners on advancing investments for capacity and service needs. Through these established structures, discussions are ongoing region by region to assess gaps/needs to advance investments. Beginning in 2019-2020, ISC implemented a series of interim, regional, formula-based core funding models to ensure that students attending First Nations elementary and secondary schools are supported by predictable base funding that is more directly comparable to what is allocated towards students in provincial schools. Under this new comparability approach, ISC has provided additional funding enhancements that respond to the unique needs of First Nation students, including: new funds for First Nations language and culture programming, support two full year kindergarten in First Nations schools (for children aged four and five), and ongoing investments in special education over and above comparable funding levels in provincial education systems. Potential funding enhancements for other activities such as transportation are being discussed with partners at technical</p>
	<p>c) Develop and implement structures and processes to advance investments in capacity and service needs such as parental engagement, culture and language, as well as transportation and infrastructure considerations.</p>	<p>Assistant Deputy-Minister (Education and Social Development Programs and Partnerships)</p> <p>Director General (Education Branch, Education and Social Development Programs and Partnerships)</p>	



			<p>tables and ISC is actively assessing the need to advance investments in transportation. These tables provide a venue to assess regional comparability and generally take place annually in spring and summer so that the result of the work can be factored into formula updates and resulting funding calculations for the following fiscal year. Further, regular meetings with the National Indian Education Council and Chiefs Committee on Education (monthly/quarterly) occur as another means to advance measures in these areas.</p> <p>In addition, work on infrastructure is continuing under the mandate of the ISC Regional Operations Sector. The Education Branch is actively engaged with its colleagues within Regional Operations on education infrastructure operation and policy updates through exploring and advising on possible options. The Education Branch will continue to work with the Regional Operations Sector to improve on infrastructure to better meet the needs of First Nation and to ensure a whole of department approach for education.</p>
<p>2. Work with First Nations and government partners on an ambitious policy framework, which aims to tackle early learning gaps and service needs, including the integration of early childhood education, using more flexible funding approaches for First Nations, and taking into consideration transportation and infrastructure challenges.</p>	<p>We <b>do</b> concur. (do, do not, partially)</p> <p>a) Engage First Nation partners on the co-development of a policy framework for early childhood education, including flexible funding approaches</p>	<p>Assistant Deputy-Minister (Education and Social Development Programs and Partnerships)</p> <p>Director General (Education Branch, Education and Social Development Programs and Partnerships)</p>	<p>Start Date: 2017                      Completion Date: 2019</p> <p>a) In 2017, the Government of Canada undertook an extensive engagement process with Indigenous partners to co-develop the distinction-based Indigenous Early Learning and Child Care Framework (IELCC), which sets out a shared vision, set of principles and a transformational path forward for high-quality and culturally rooted early learning and child care programming for all Indigenous children. The IELCC Framework aims to support the development of flexible, Indigenous-led, and culturally appropriate programs for early learning and child care that are responsive to the unique needs of a child, family or community. It is a guide for communities, program administrators, service providers, policy makers and governments (federal, and where applicable, provincial) to better respond to and support the needs, responsibilities and aspirations of Indigenous children and families across Canada regardless of where they live. The Framework came into effect in 2018-2019 and Canada is investing \$1.7 billion over 10 years in support of it. The First Nations and Inuit Health Branch (FNIHB) of ISC is responsible for Aboriginal Head Start on Reserve (AHSOR), which is the ISC programming that is funded under the IELCC. PHAC's Aboriginal Head Start in Urban and Northern Communities and ESDC's First Nations and Inuit Child Care Initiative are the other federal early learning and child care programs included.</p> <p>Additionally, between 2016 and 2018, ISC worked closely with First Nations to fundamentally transform funding for First Nations K-12 schools on reserve. As a result, a new funding approach was launched in 2019-2020 so that students attending First Nations K-12 schools are supported by funding that is comparable to funding in provincial education systems. This includes support for full-day kindergarten for children aged 4 and 5 (K4 and K5) at First Nations schools, and applies in jurisdictions where kindergarten for children aged 4 and 5 would not be part of regular elementary education programming in order to enhance early learning. This investment in K4 and K5 on-reserve schools is an important part of supporting early learning for First Nations children.</p> <p>ISC engages in ESDC-led interdepartmental governance tables (DG/ADM levels) to advance integrated IELCC service delivery, programming and policy development.</p>

3. Work with First Nations and government partners on a clear and comprehensive strategy to support First Nations in addressing special education needs at or beyond levels to those offered off-reserve.	We <b>do</b> concur. (do, do not, partially)	Assistant Deputy-Minister (Education and Social Development Programs and Partnerships)  Director General (Education Branch, Education and Social Development Programs and Partnerships)	Start Date: 2019 Target Completion Date: March 2022  a) A comprehensive review of First Nations special education is underway; ISC will collaborate with the Assembly of First Nations (AFN) and government partners (such as ISC's First Nations and Inuit Health Branch) to undertake the review in two phases: <ul style="list-style-type: none"> <li>Phase One (2020-2021) is ongoing and examines a series of issues and data elements, such as past special education regional funding allocations, services provided and student populations, and will result in an interim report (ongoing) that will rely on existing data, input from First Nations communities, ISC data, and regionally-led engagement sessions. The process may lead to new funding.</li> <li>Phase Two (2021-2022) will include a more comprehensive report that will focus on policy issues, program structure, eligibility criteria, relationship to Jordan's Principle and other issues affecting First Nations' High-Cost Special Education needs.</li> </ul>
	a) Engage First Nation partners to develop a strategy to address special education needs.		b) Measures to address interim funding short falls
4. Work with First Nations and other ISC sectors as appropriate to integrate trauma and healing-based approaches to education support, which contribute to restoring and strengthening pride, identity, and self-determination.	We <b>do</b> concur. (do, do not, partially)	Assistant Deputy-Minister (Education and Social Development Programs and Partnerships)  Director General (Education Branch, Education and Social Development Programs and Partnerships)	Start Date: 2017 Completion Date: April 2019  a) After an extensive engagement process with First Nations partners, an education transformation policy proposal was produced, endorsed by Chiefs in Assembly in 2017, and approved by Cabinet in 2018. The new education funding formula provides First Nations with provincially-comparable funding for activities such as guidance counselling, school-based wellness programs. This transformation policy enables First Nations to set their own priorities and provide the services that are priority in their communities. This comparable funding, combined with funding enhancements for language and culture activities that go beyond provincial comparability, can support the integration of trauma and healing-based approaches into the curriculum and programming delivered by First Nations. Further, consistent with the principle of First Nations control of First Nations education, the transformed funding approach provides flexibility for First Nations to set their own priorities and make investment decisions that strengthen pride and self-determination. For example, many First Nation schools have embraced the use of Elders to provide culturally appropriate
a) ESDPP will collaborate with ISC sectors and engage with First Nations to include the integration of trauma and healing-based approaches o education support.			

			and healing-based student support services.
5. Invest in communications with regional partners and First Nations to improve relationships and understanding, and to further advance reconciliation.	<p>We <b>do</b> concur. (do, do not, partially)</p> <p>a) ESDPP will work with regional partners and First Nations to strengthen communications to support mutual understanding and reconciliation.</p>	<p>Assistant Deputy-Minister (Education and Social Development Programs and Partnerships)</p> <p>Director General (Education Branch, Education and Social Development Programs and Partnerships)</p>	<p>Start Date: 2017 Completion Date: April 2019</p> <p>a) ESDPP considers communication with First Nations and other relevant partners essential and supports it and engages with First Nation partners on a regular basis and supporting engagement at all levels of the department . For example, ongoing funds are invested in regional technical tables and efforts in policy co-development on education to advance both the goals of having First Nations education under First Nations control as well as reconciliation. To help improve relationships, support strong outcomes and accountability, ESDPP works in partnership with ISC Regions (e.g., on data management policies and on processes of resolving data issues). The Regions play an important role as the go-between for First Nations and Headquarters. Broader strategic engagement and governance with the National Indian Education Council, Chiefs Committee on Education, and Permanent Bilateral Mechanisms at the working level through to Ministerial level all provide an established venue to continue routine and consistent engagement to advance the education mandate and Departmental devolution mandate. ESDPP is developing a Data Release Policy in consultation with ISC Regions and Indigenous partners; the Data Release Policy is expected to be completed by March 2021. The Education Data Quality Working Group meets monthly with ISC Regional representatives to discuss data-related processes and issues, such as the status of completion of Education Reports; this group meets on an ongoing basis. ESDPP has piloted an initiative that provides First Nations with access to their own data through the Education Reports and Analysis Solution (ERAS) so that they may extract and generate reports. ERAS depersonalizes data from the Education Information System to ensure privacy and allow for analysis and statistical reporting at the recipient, regional, and national levels. First Nations were involved in defining the type of reports required, the testing process, and the implementation schedule. The test phase of the data sharing pilot project was launched in May 2019 to 21 funding recipients from 17 First Nations. During the testing period, users were provided with the opportunity to send comments and suggestions to the regional offices and headquarters. The responses from the test phase were positive, with no major issues identified. Recommendations from the test phase were implemented to improve the value of the reports. As of December 2019, First Nations can access reports directly from ERAS.</p>

## Introduction

After the creation of the new departments of Indigenous Services Canada and Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) in November 2017, Elementary/Secondary Education falls under the mandate of ISC.

The Evaluation of the Elementary and Secondary Education Program was undertaken in 2017/18, and generally examined activities and progress against stated outcomes covering the period from 2012-13 to 2017-18. The evaluation was completed using a series of eight site visits in most regions in Canada (except Yukon and Atlantic), as well as 71 key-informant interviews with First Nation education administrators, ISC staff, provincial education representatives, and stakeholder groups. Additionally, a full analysis of the contents of the Education Information System, as well as an extensive literature review, was undertaken.

Gender-Based Analysis+ is embedded throughout the report; in collecting and analyzing data, gender, age, mental health and cultural identity were considered.

Much of this evaluation was undertaken while the Government of Canada was engaging First Nations and other Indigenous communities on education funding reform, through 2017 and 2018. In order to avoid duplication and overlap of efforts, the evaluation scope and depth were reduced so as not to seek the same information from the same groups, and to provide a perspective after reflecting on some of the outputs of those engagements.

This evaluation specifically examined the impacts of elementary/secondary support funding, High-Cost Special Education, New Paths for Education, the First Nation Student Success program, the Education Partnerships program, and the First Nation and Inuit Cultural Education Centres Program, representing approximately \$1.3 billion to \$1.5 billion per year between 2010-11 and 2016-17. Notably, funding increased to more than \$1.8 billion per year from 2017-18 and is forecasted to be approximately this amount going forward to 2021-2022 at approximately \$1.9 million.<sup>5</sup>

### 1. Program Description

The objective of the Elementary and Secondary Education Program is to provide eligible students ordinarily living on reserve with elementary and Secondary education programs comparable to those that are required in provincial schools by the statutes, regulations or policies of the province in which the reserve is located. The intention is that eligible students receive a comparable education to other Canadians within the same province of residence, and achieve similar educational outcomes to other Canadians, to their individual benefit as well as that of their communities and Canada as a whole.

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<sup>5</sup> Estimates from Grants and Contributions to support First Nations Elementary and Secondary Educational Advancement spending projections outlined in ISC's 2019-20 Departmental Plan. (<https://www.sac-isc.gc.ca/eng/1553091423019/1553091462670#sec2>)

The Elementary and Secondary Education Program also funds special education services for First Nation students identified as having mild to moderate learning disabilities. Funding is provided for programming, remedial instruction, clinical services and resource teacher staffing.

Building upon sound learning environments, and participation and progression in elementary, secondary, the Education programs contribute to the achievement of the ultimate outcome of having First Nation and Inuit students graduate from high school. As is the case with all ultimate outcomes, its achievement is also influenced by a wide variety of factors, which are discussed throughout this report.

The sub-program outcome, as measured in the Departmental Report each year, is that First Nation students progress in their elementary and secondary education, which is to be assessed by the percentage of tested students on reserve who meet or exceed a standard assessment for literacy and numeracy in the province of reference (at the testing interval adopted by that province, referenced by gender and province).

Band councils, or organisations designated by band councils, are responsible for ensuring that students ordinarily resident on reserve have access to elementary and secondary instructional services in a band-operated, provincial or a private/independent school recognized by the province as an elementary/secondary institution. In the case of band-operated schools, band councils are responsible for ensuring that programs comparable to provincially recognized programs of study are provided, and that only provincially certified teachers are employed. The band council is also responsible for ensuring that education standards allow students to transfer without penalty to an equivalent grade in another school within the school system of the province in which the school is located. Finally, the band council is responsible for providing school-board-type services to band-operated schools and eligible students as required.

Eligible costs for instructional services include: salaries; support for cultural and language learning and counselling; professional development; curriculum development; materials; testing; professional and para-professional services; services for official language instruction; books and instructional supplies; internet connectivity; support for equivalency programming (e.g., distance education); school nutrition programs; school administration; and school evaluations. Eligible costs are similar between schools on and off reserve, and federally run schools, with some differences.

Other eligible costs include student support services, such as: room and board; transportation; guidance counseling; certain types of financial assistance; and costs associated with being accommodated outside the home. Eligible school-board-type costs can include: costs associated with coordination of region-wide education programs and services in more than one community; curriculum development; operational costs; as well as other costs (see National Guidelines<sup>6</sup>). While school-board-type services are eligible under the core Elementary and Secondary Education Program, actual support for many of these activities had evolved to be

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<sup>6</sup> Education programs: National program guidelines 2017-18 to 2019-20 (<https://www.sac-isc.gc.ca/eng/1415377531020/1531401688567>)

funded through proposal-based programs such as the New Paths for Education Program and First Nation Student Success Program, which were developed over the years to target the types of activities listed in the above paragraphs in a modern way.

During the period of this evaluation, the program made funding available to communities either in the form of a one-year or multi-year Set, Fixed or Block contributions, depending on the type of service. The results of the General Assessment<sup>7</sup> of each recipient may impact the duration of the agreement and the recipient's ability to access certain funding approaches.

The Nominal Roll is the registry of all eligible elementary and secondary students funded by ISC to attend a band-operated, federal, provincial or private/independent school. Data in the Nominal Roll are stored in the Education Information System at ISC Headquarters.

### ***The High-Cost Special Education Program***

ISC provides funds through the High-Cost Special Education Program for students assessed with moderate to profound learning disabilities. The program funding is student specific and based on individual student requirements. It is used for direct service support in the form of personnel, adaptive materials and resource services. The objective is to improve the educational achievement levels of First Nation students on reserve by providing for access to special education programs and services that are culturally sensitive and meet the provincial standards in the locality of the First Nation. The desired outcomes are that an increased number of High-Cost Special Education students have acquired a high school diploma or a certificate of completion<sup>8</sup>, and that these students are provided with support services as identified through their Individual Education Plans.

Direct services include program activities such as classroom student intervention and counselling, focused directly on meeting student needs, and these direct services need to account for a minimum of 75 percent of allocated funds. Indirect services refer to an array of supportive programs and activities focused on enhancing special education programming at schools, such as providing information services and professional development opportunities, and need to account for a maximum of 25 percent of allocated funds. The eligible expenditures, including eligible costs for adaptive technology are detailed in the National Guidelines<sup>9</sup> for First Nations seeking support for high-cost special education services.

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<sup>7</sup> AADNC General Assessment

<sup>8</sup> The 2018 OAG report found that graduation rates were further overinflated due to the lack of differentiation of diploma and certificate of completion, and that the latter may prove an obstacle to a student's ability to access post-secondary education (para 5.54).

<sup>9</sup> High-Cost Special Education Program: National Program Guidelines 2019 to 2020 <https://www.sac-isc.gc.ca/eng/1552754962206/1552755057452>

### ***New Paths for Education***

New Paths for Education was a proposal-based program that funded projects and activities designed to improve the quality of education in First Nation schools and to enhance the educational experiences of students, teachers, administrators, parents and communities. Its objectives were to strengthen First Nation education management and governance capacity; improve the effectiveness of classroom instruction through curriculum and language development, pedagogical improvements, and Information and Communications Technology; support parental and community engagement; and assist band-operated schools to recruit and retain qualified teachers and educators and provide them with professional development opportunities.

Eligible expenditures included learning materials, professional fees, salaries, transportation and administrative costs. As of 2019-20, this sub-program was discontinued.

### ***First Nation Student Success Program***

The First Nation Student Success Program supported activities that aimed to increase students' achievement levels in reading and writing (literacy), mathematics (numeracy) and encourage students to remain in school (student retention). The program specifically supported the development of school success plans, student learning assessments and performance measurement systems for schools to assess, report and take steps to accelerate progress made by students and schools. As of 2019-20, this sub-program has been discontinued.

### ***Education Partnerships Program***

The Education Partnerships Program is intended to promote collaboration between First Nations, provinces, ISC and other stakeholders. The partnership component supports the establishment and advancement of formal partnership arrangements that aim to develop practical working relationships between officials and educators in provincial systems and in regional First Nations organizations and schools. The structural readiness component supports activities that strengthen the organizational capacity of First Nation organizations to: deliver educational services to First Nation schools; cover start-up costs for First Nation school boards; develop agreements with provincial school boards to establish new approaches to tuition/service agreements or fully delegate the responsibility to administer on-reserve schools to a provincial school board.

This program is one component of education reform with the overall objective to advance First Nation student achievement in First Nation and provincial schools. It is expected to do this through support for partnership arrangements, where First Nation and provincial officials share expertise and services, and partners coordinate learning initiatives in support of First Nation students, which can also lead to informing ISC education policy evolution.

ISC provides funding for both the establishment and advancement of partnerships, as well as administration costs.

### ***First Nation and Inuit Cultural Education Centres Program***

The First Nation and Inuit Cultural Education Centres Program provides proposal-based funding to First Nation and Inuit Cultural Education Centres on reserves or within Inuit settlement regions to support the development and promotion of First Nations and Inuit cultural heritage. The objective is to support First Nation and Inuit communities in expressing, preserving, developing, revitalizing and promoting their culture, language and heritage, through the establishment and operation of First Nation and Inuit cultural education centres. It also ensures that culturally relevant programming and services are available to First Nation and Inuit students through cultural education centres. It will also contribute to an enhanced cultural environment and understanding within communities.

The desired outcomes are: revived traditional cultural skills among First Nation and Inuit people; developed contemporary cultural skills among First Nation and Inuit people; First Nation and Inuit peoples' knowledge and use of their traditional languages; and cross-cultural awareness in mainstream educational programs and institutions.

ISC directly funds First Nation and Inuit cultural education centres and the Inuit Tapiriit Kanatami. ISC also funds the First Nations Confederacy of Cultural Education Centres, which manages and administers funds for a majority of First Nation Cultural Education Centres. Eligible expenditures include salaries, materials, service fees, facility rental, administration and travel.

## **2. Key Findings**

### **2.1 A Snapshot of First Nation Student Outcomes**

**Finding 1. Education success of First Nation students is low and is not showing broad signs of improvement, especially for students attending school on reserve.**

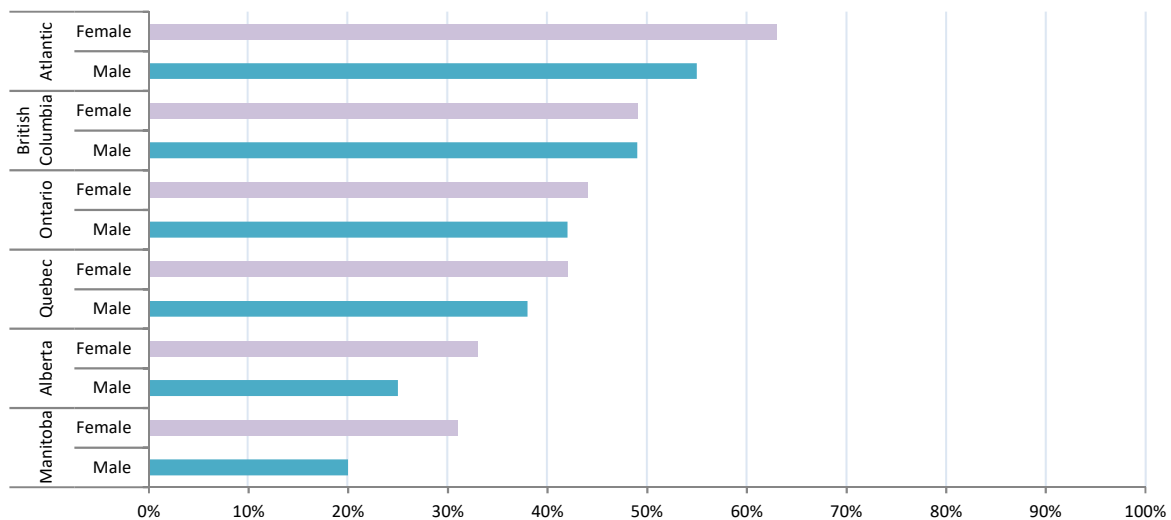
According to the 2016 Canadian Census, the proportion of adults without a high school diploma or other post-secondary or trades certificate on reserve was 62 percent, compared to about 34 percent of the Indigenous population off reserve, and 18 percent for the rest of the Canadian population. The stated outcome of the Elementary and Secondary education sub-program is that students will progress in their elementary and secondary education, assessed by the percentage of tested students on reserve who meet or exceed a standard assessment for literacy and numeracy in the province of reference. In general, however, results show low levels of literacy (Figure 1) with modest but notable differences between male and female learners



(with female learners generally performing better), and significant regional variability from approximately 48 percent in British Columbia to 26 percent in Manitoba. Similar figures are observed with numeracy.<sup>10</sup>

Such data before or after this period are not yet available to measure change over time using these indicators. And importantly, there is considerable variation between the 2015-16 and 2016-17 numbers with some anomalies, suggesting reliability issues in terms of what students are being captured in these figures. These data have been collected only since 2015 and do not differentiate between students attending school on or off reserve, nor do they differentiate between grade levels or ages.

**Figure 1: 2016-17 Literacy Rates by Region (excluding Saskatchewan<sup>11</sup>) and by Gender**



The department does, however, systematically track information on progression, exits and graduation. Of all the students eligible to graduate in any given year, Nominal Roll data show that success, as measured by advancement to the next grade, or graduation, fell slightly from 46 percent to 43 percent from 2010-11 to 2015-16. While ISC reports graduation rates as the proportion of students in their final year of studies who graduate, this does not account for the students that did not make it to their final year. Student outcomes are better articulated by cohort analysis<sup>12</sup> that captures progression and results over a period of time.

<sup>10</sup> Figures are taken from ISC's 2017-18 Departmental Report. Information on the methodology of this data collection and the total number sampled are not articulated in the Departmental Report. Actual results are for First Nation students on reserve who participated in standardized testing in 2016-17.

<sup>11</sup> Data on Saskatchewan has not been collected for this metric.

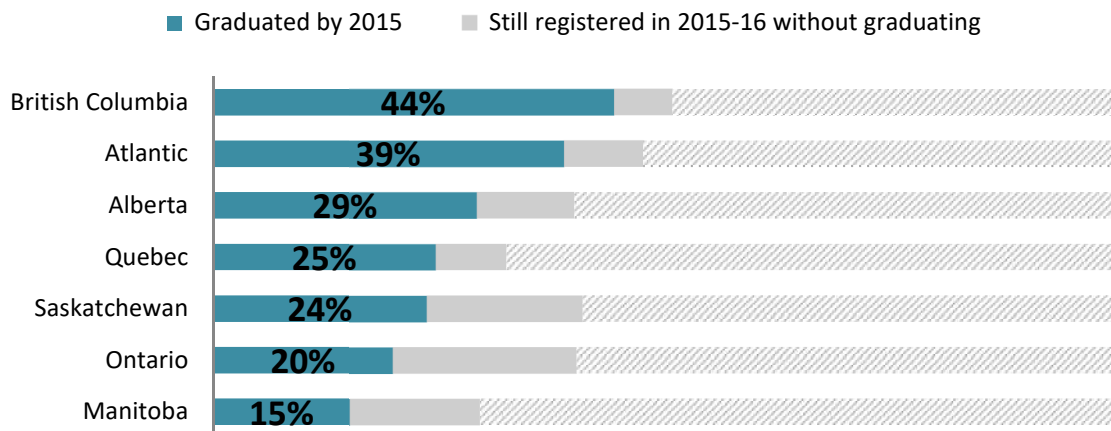
<sup>12</sup> The 2018 OAG report also raises this concern in more detail with respect to the calculation of graduation rates.

A cohort analysis of all students in the Nominal Roll registered in grade 9<sup>13</sup> in 2010 reveals low proportions of students graduating by the end of 2014-15 (within 5 years of entering grade 9), from about 15 percent in Manitoba to about 44 percent in British Columbia (Figure 2), and about 28 percent overall. Generally, there is a significant gender gap, with women typically graduating at a rate of about 10 percent higher than men, except in Alberta where the gap is smaller, and in Ontario where the gap is wider. Notably, these estimates could be inflated somewhat for any students who were marked as having completed studies in 2012-13 or 2013-14 due to coding issues, which were resolved as of 2014-15.

Importantly, however, the proportion graduating by 2015 was markedly higher for First Nation students attending school off reserve, with significant gaps between on- and off-reserve students observed in British Columbia, Alberta, Quebec, and especially in Ontario (see Figure 3).

As mentioned above, the frequencies of repeating grades and dropping out begin to spike in Grade 9 and 10, suggesting that this is a critical point for many students in terms of progression. There is no gender difference in this regard.

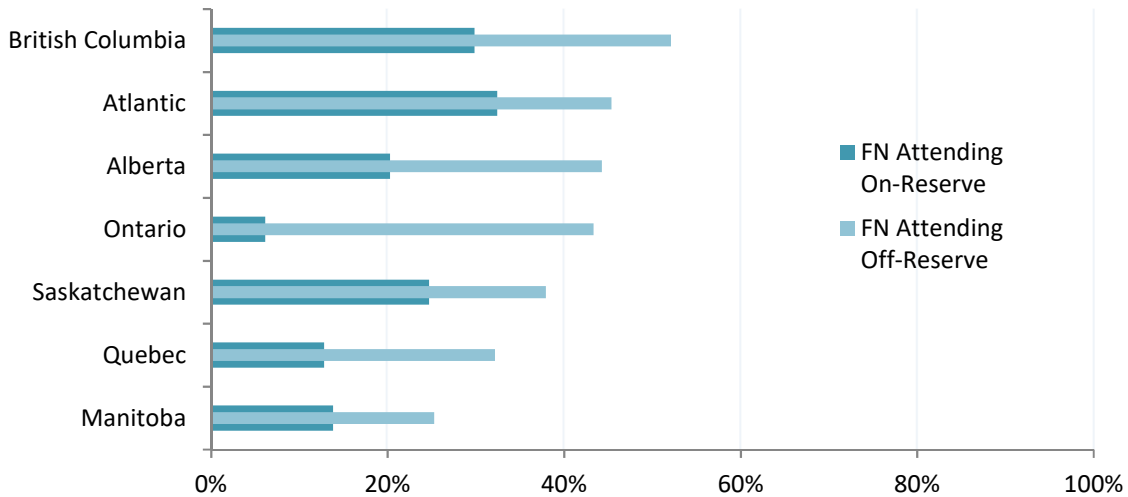
**Figure 2: Graduation and Leaver<sup>14</sup> Rates for Cohort Registered in Grade 9 in 2010**



<sup>13</sup> Grade 9 was chosen based on the fact that this is when the data show a considerable proportion of students begin repeating grades or dropping out, and 2010 was chosen as it is the only cohort with at least five years of reliable data to date.

<sup>14</sup> Refers to a student not returning to school the following year who has not graduated and not changed schools.

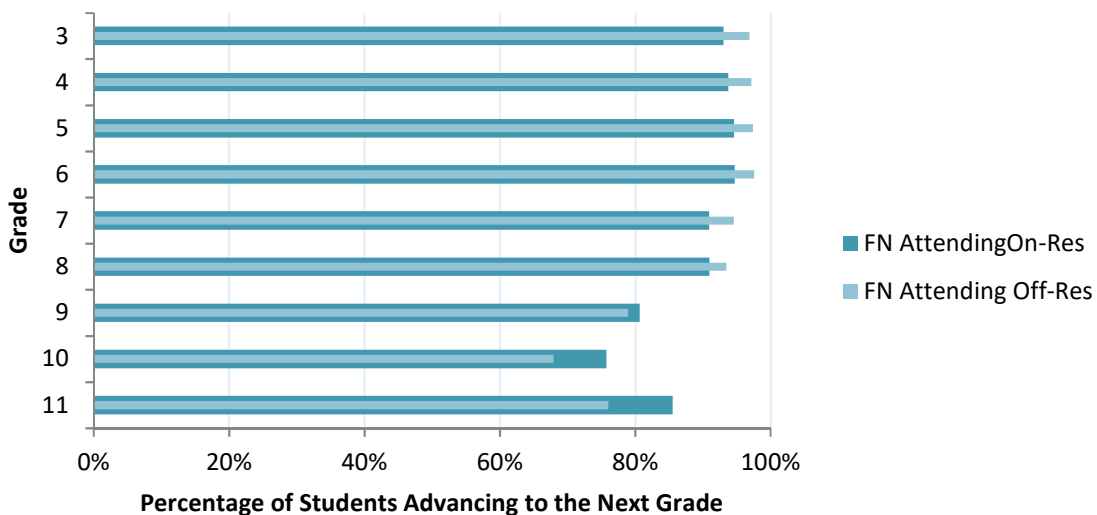
**Figure 3: Regional Graduation Rates by School Type for Cohort Registered in Grade 9 in 2010**



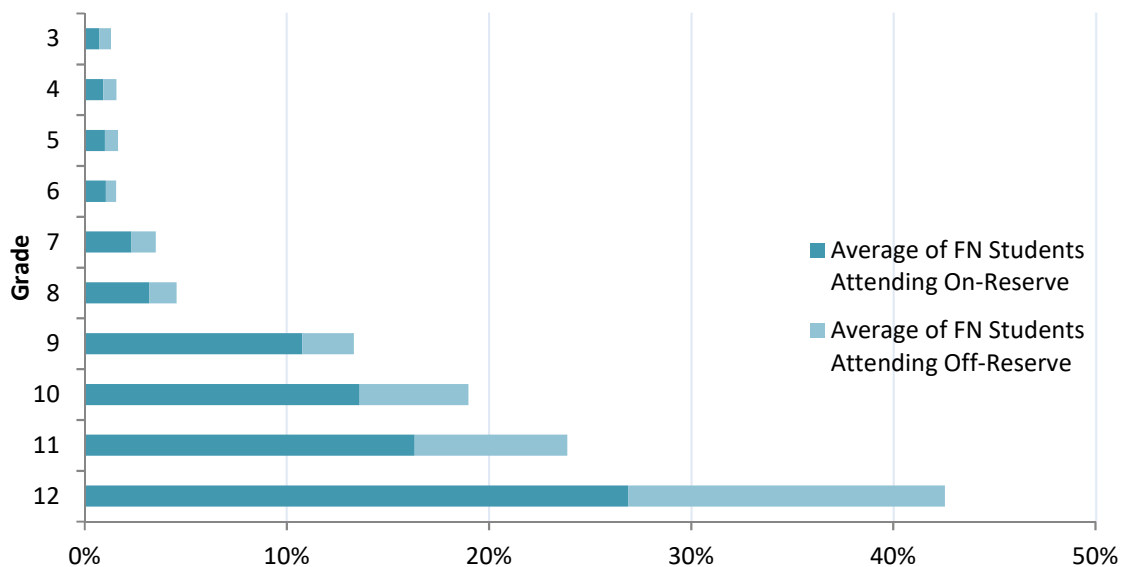
For grade progression, while First Nation students attending school on and off reserve seem to show similar trends in earlier years, this changes at grade 10, where First Nation students attending schools off reserve show a considerable drop in progressing to the next grade (either repeating a grade or dropping out), at about 68 percent, compared to 76 percent on reserve. A similar gap is seen in grade 11, with 76 percent of First Nation students attending school off reserve passing grade 11 compared to 86 percent on reserve (see Figure 4).

These results seem to suggest that while students attending school off reserve repeat grades at a higher frequency, they also graduate at a higher frequency. When examining student dropout data, trends mirror those of graduation rates, with First Nation students attending school on reserve dropping out at significantly higher rates than those attending off reserve (see Figure 5).

**Figure 4: Grade Progression Rates between First Nation students attending school on versus off-reserve**



**Figure 5: Dropout Rates between First Nation students attending school on versus off-reserve**



To understand these results in contexts beyond gender and region, a regression<sup>15</sup> analysis was undertaken to illustrate factors related to success. Beyond region, gender and school type, this also included measures from the 2011 census of the education level in the community (assessed by the proportion of adults with a high school education or higher); the economic strength of the community (assessed by the participation rate<sup>16</sup> and median household income); housing crowding<sup>17</sup>; and remoteness (using an index of remoteness developed by ISC that factors in several components of access to services and distance from services on a scale of 0 to 1, with greater numbers meaning greater remoteness) (see Table 1).

The analysis suggests that all of these factors are associated with education success as measured in this cohort analysis, but not universally, and there is significant regional variation (see Table 1). For students in Quebec attending school on reserve, for example, their success appears deeply related to the education level in the community, the economy, the extent of crowding in homes and community remoteness. For the students attending off reserve schools, these relationships are less pronounced, but crowding and remoteness have major impacts.

For students in Ontario attending school off reserve, their success is highly related to the education level in their community and remoteness. There are no determinants strongly related to success in Manitoba. The low success rates are consistent across all factors.

<sup>15</sup> Using models of regression to assess which variables have the strongest predictive power for success indicators.

<sup>16</sup> Defined by Statistics Canada for the purpose of the Canadian Census as the total labour force in that group, expressed as a percentage of the total population in that group.

<sup>17</sup> Defined by Statistics Canada for the purpose of the Canadian Census as dwellings that do not have enough bedrooms for the size and composition of the household.

For students attending school off reserve in Saskatchewan, their success is highly related to all factors except remoteness. There seem to be no factors varying the success of students attending school on reserve.

All factors are related to the success of Alberta students attending schools on and off reserve, except for crowding. There are noted gender differences with men's success being far more related to the educational attainment of the community, and to remoteness, than women.

The success of British Columbia students attending school on reserve is far more related to these variables than for those going to school off reserve. There is a noted gender difference with remoteness being related to the success of women attending school on reserve more so than men.

The implications of these observations are no doubt deeply complex. Economic, social, historical and geographic issues likely affect different regions, communities and individuals differently. As outlined in the remainder of this report, this speaks to a need to reconsider how the issue of First Nation student success is approached systemically.

**Table 1: Factors Associated with Student Success**

Region	School Type	Gender	Community Education Level 2011	Participation Rate 2011	Median Income 2011	Housing Crowding 2011	Remoteness
Quebec	First Nation	M	2	2	1	2	2
		F	2	1	2	2	0
	Provincial	M	0	0	0	1	2
		F	0	0	0	2	0
Alberta	First Nation	M	2	0	0	0	2
		F	1	0	0	0	0
	Provincial	M	2	1	0	0	2
		F	0	2	2	0	0
Saskatchewan	First Nation	M	0	0	0	0	1
		F	0	0	0	0	0
	Provincial	M	1	2	2	2	0
		F	1	2	0	2	0
Ontario	First Nation	M	1	0	0	0	2
		F	0	1	1	0	0
	Provincial	M	2	0	0	1	2
		F	2	0	0	1	2
British Columbia	First Nation	M	2	2	0	1	0
		F	1	1	0	0	2
	Provincial	M	0	0	0	0	1
		F	0	0	0	0	0
Manitoba	First Nation	M	1	0	0	0	0
		F	1	0	0	0	0
	Provincial	M	0	0	1	0	0
		F	0	1	0	1	0
Atlantic	First Nation	M	0	0	0	0	1
		F	0	1	0	0	0
	Provincial	M	0	1	0	0	0
		F	0	0	1	1	0

No Relation to Outcomes	0
Some <sup>18</sup> Relation to Outcomes	1
Significant <sup>19</sup> Relation to Outcomes	2

<sup>18</sup> A statistically significant relationship if  $p < 0.1$ .

<sup>19</sup> A statistically significant relationship if  $p < 0.01$ .

## 2.2 Review of ISC's Education Funding Approach

**Finding 2: The historical and community context of First Nations is that, due to unique factors such as remoteness and lack of aggregation of service models in many cases, it costs more to operate a school on reserve than to operate a provincial school.**

First Nation student success entails a sense of pride and identity, which Canada's historical colonial legacy has eroded for many Indigenous peoples and their children through intergenerational trauma. Every Indigenous partner interviewed in this evaluation indicated that the legacy of residential schools, the Sixties Scoop and related colonial policies continue to influence attitudes towards the education system at large amongst First Nation community members. The program design and funding structure of ISC programs during the period of this review did not address the breadth of need both directly and indirectly related to a strong education system. This necessitates a significant reconsideration of how ISC can better support First Nations to address education barriers and gaps.

An appropriate support system should assume that generally, First Nation children come from a place of collective and often individual trauma, and that many need strengthened supports well beyond classroom and curriculum – to parental engagement, cultural connection and extensive social community development and services.

While the raw dollar per capita funding for First Nations education on reserve is high relative to provincial ministries, it does not account for the legislative, economic and historical context of First Nation realities, where costs would vastly exceed those off reserve if a model of **sufficiency funding** (funding based on cost as opposed to indexation) applied.

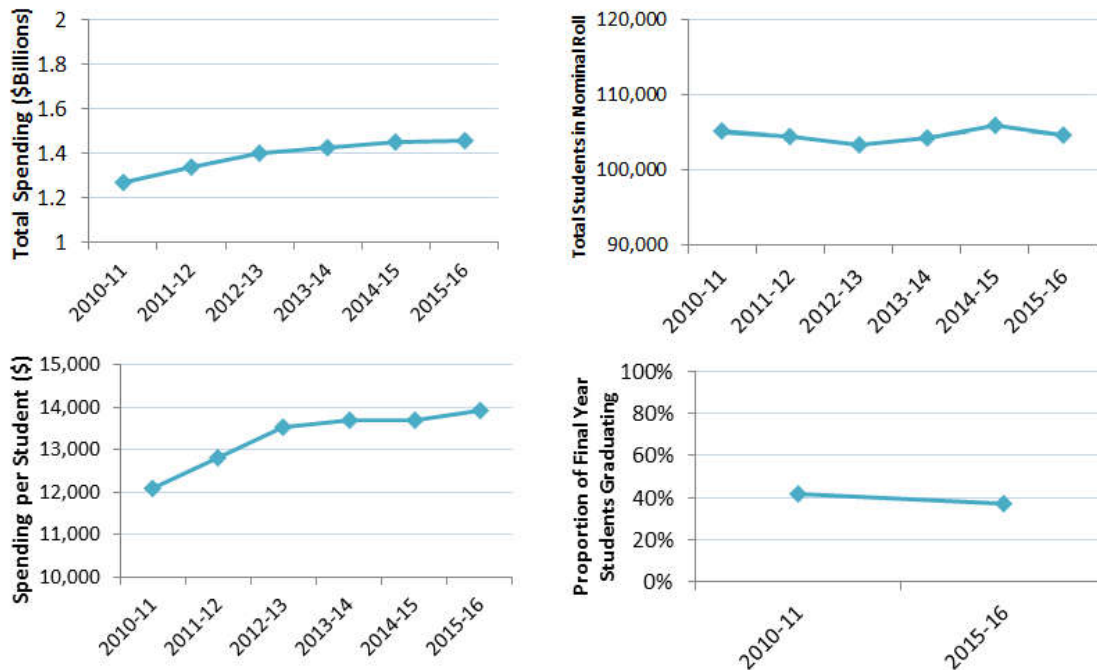
During the period covered in this review, funding took the form of a mix of proposal-based project funding and annual block funding normally distributed in 4 or 5 year agreements. The general premise is that funding First Nations this way will enable First Nation schools to offer a learning environment that is comparable to that off reserve. Critically, however, this goal presumes that a comparable learning environment is adequate and appropriate for First Nation students, and uniformly so across all First Nations. First Nation and government interviewees participating in this evaluation agreed that ISC program support should have a goal of appropriateness and sufficiency, not comparability.

For First Nation students attending school off reserve, provincial schools are reimbursed a tuition amount at the rate of the provincial nominal roll for that school. This creates an inequity – whereas provincial schoolboards negotiate the tuition amount with First Nations who administer provincial tuition (or with ISC where the First Nations does not administer the tuition), during the period covered in this evaluation, ISC alone determined the amount for a student attending school on reserve, not the First Nation. In other words, First Nations had far less control and

autonomy than provincial school boards, but were expected to offer comparable programs and facilitate comparable results.

Ultimately, both total and per-capita funding have increased (see Figure 6). While the number of students on the nominal roll was stable<sup>20</sup> (approximately 105,000) between 2010-11 and 2015-16, both total and per-capita expenditures have increased by 15 percent in that time, from \$1.27 billion to \$1.46 billion per year, or from approximately \$12,000 per student to \$14,000 per student. Improvements in student success have not occurred over this time frame. While the Nominal Roll data are not (as of the completion of this report) usable past 2015-16, it is important to note that funding increased in 2017-18 to approximately \$1.83 billion, which is approximately the planned spending going forward to 2020.

**Figure 6: Total and Per Capita expenditures have increased 15 percent while the total number of students has remained stable between 2010-11 and 2015-16, and graduation rates have not improved**



This evaluation finds a need to restructure program funding access and support, in addition to the annual increasing funding reference levels stemming from Budget 2016. A significant proportion of the costs of operating a functional and appropriate education system on reserve is for wrap-around services, such as psycho-educational and extra-curricular supports; infrastructure, which is handled separately from education funding within ISC; salaries for support staff; and transportation. Whereas off reserve, funds for these expenses come from comprehensive funding from school boards with revenues from provincial ministries and municipalities, this contrasts sharply to funding on reserve, where it is a combination of proposal

<sup>20</sup> Potentially attributable to increases in communities with education agreements that may not report students on the nominal roll.



and block funding mostly from ISC, which is largely referenced by historical indices as opposed to being cost-determined.

With limited to no revenue base, many First Nations mostly need to rely on ISC funding for education and wrap-around services. ISC's current approach to funding does not adequately reflect the fact that operating an education system on reserve costs more, not only for direct costs of education provision such as teacher salaries and transportation, but all wrap around services, which in a municipality would be covered under multiple budget areas. Despite increased funding, some education staff on reserve interviewed said they must spend time seeking outside funding for wrap-around services, which generally are more readily available off-reserve.

Many First Nation-operated schools (with few exceptions) are unable to provide competitive compensation for teachers and teaching assistants, and normally are limited in their ability to employ teachers beyond one-year contracts. Often, when First Nation schools are able to provide salary parity, they are able to do so only if they have significant revenue streams. Site visit participants interviewed for this evaluation stated that the disparity between wages, predictability and job security on reserve versus those in provincial schools was a driving factor behind a lack of teacher retention.

A lack of teacher retention creates several issues for First Nation schools, including increasing the school's administrative workload by creating a need to constantly recruit and hire new teachers, which was identified as a challenging, time-consuming process, and especially challenging for remote and isolated communities and those with limited administrative capacities. The lack of retention also inhibits the school from having a faculty with strong relationships with students, parents and the community at large – something that was identified as crucial to student and community wellbeing.

The approach to funding during the evaluation period did not take into account the unique circumstances (both historical and current) that affect students accessing education. Despite the fact that funding per capita is high relative to provincial ministries, the missing aspect of this funding is the necessary wrap-around services unique to each community.

*“There are students that eat at our lunch program on Friday that won't be given another meal until they come back to our breakfast program on Monday morning.”*

- First Nation school administrator

Student transportation was cited as problematic, where many interviewees indicated that communities with poor road infrastructure face significant challenges, as travelling down poorly maintained roads accelerates the deterioration of buses, and they lack the funding for adequate repairs. Often it is very difficult to procure funds for student transportation and communities have indicated it can take far too long to receive these essential funds. One community visited had pursued funding for a washer and dryer for the school to wash and dry students' clothes

after they walked kilometers through mud to attend classes, due to poor road conditions and insufficient transportation, but funding for such items does not exist due to the rigidity of funding models.

School infrastructure continues to be a struggle for many communities. There is a long waitlist of communities for new schools, and many do not know how long they will wait for their proposal to be considered. If a project is approved, it becomes another long process for education and band administrators to handle. Additionally, school infrastructure is handled via a separate program and funding allocation from ISC, further complicating a First Nation's ability to procure funds, and by requiring First Nations to adhere to what is considered 'allowable' expenses, rather than allowing First Nations to establish their priorities based on their unique circumstances.

### 2.3 Early Childhood Learning

**Finding 3: The Government of Canada's separation of Early Childhood Learning from the education system on reserve is counter to internationally recognized best practice, and is not conducive to an effective education system.**

The separation of Early Childhood Learning from the rest of the education system runs contrary to the notion of lifelong learning. Lifelong learning, as articulated by many First Nation communities, is an ongoing process beginning with early childhood education and continuing beyond post-secondary education.<sup>21</sup> The separation also increases the administrative burden faced by First Nation education administrators, who already fill multiple roles.

Indigenous partners who were interviewed indicated that there is a strong will amongst educators to get children into classroom-like environments at an earlier age in order to better familiarize them with the classroom, to offer opportunities to be close in proximity to their siblings and to allow for stronger education programs for early learners. The separation of early childhood education from elementary/secondary education results in early childhood education programs being housed in separate facilities than the school, if the programs are available at all.

It was commonly noted in interviews conducted as part of site visits that First Nation children entering Kindergarten do so at a considerable disadvantage when there is no formalised early childhood education system on reserve. There was variability between communities on the extent to which they felt funding for Aboriginal Head Start was sufficient, and a tendency to deprioritise early childhood education in general where the basic elementary education system was struggling to meet basic needs.

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<sup>21</sup> Assembly of First Nations, 2012 Chiefs Assembly on Education, presentation on "Lifelong Learning" ([https://www.afn.ca/uploads/files/events/fact\\_sheet-ccoe-11.pdf](https://www.afn.ca/uploads/files/events/fact_sheet-ccoe-11.pdf))

It was noted by key-informant interviewees, and is echoed in the last evaluation of Elementary/Secondary Education completed in 2012-13, that the Government of Canada's fragmentation of early childhood education policy is acting to the detriment of communities' ability to adequately support these systems, and ultimately to the detriment of learner success.

A substantial body of international research, including the findings of a number of well-cited longitudinal studies, suggests that appropriate participation in high-quality early childhood education programs leads to short- and longer-term improvements in educational achievement, particularly for disadvantaged children. Additionally, positive outcomes (albeit more nuanced and mixed) can also be expected on child health, wellbeing and parenting skills. Early childhood education has also been shown to contribute to increased income over the short (for parents) and longer term (for children), as well as a reduced use and reliance on public services (e.g., social services, welfare, justice-related, among others). Further, research sponsored by the World Bank, which has taken a lead role in Early Childhood Care and Development, states that 'Policymakers must identify the educational investments that yield the highest public returns. Here, the literature is clear — Dollars invested in Early Childhood Care and Development yield extraordinary public returns.'<sup>22</sup>

First Nation education policy in general needs to look at issues holistically and recognise that an ambitious policy framework, which aims to tackle early learning gaps and needs, is needed. Including early childhood education into ambitious and integrated education policy would not only better empower First Nations to support their young children's education in a way that is culturally relevant, but would also allow for the early assessment of any learning issues or special needs. Early intervention in these matters will substantially increase the likelihood of longer-term success and wellbeing.

## 2.4 Regional Agreements

**Finding 4: While regional agreements in certain contexts have shown promise, they are not solutions in and of themselves as the challenges are far more complex than governance structure.**

Regional agreements can be a powerful self-determination tool, allowing communities to work together to create better outcomes for the future. Over the time period covered by this evaluation, ISC had two regional agreements in the area of education: British Columbia had the British Columbia Tripartite Education Agreement, which has one of the highest regional graduation rates amongst Indigenous students (although notably this has always been the case and predates the agreement); and Manitoba had the Manitoba First Nations School system, which includes 11 Manitoba First Nations and is a First Nations-designed and led school

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<sup>22</sup> Grunewald, R. and Arthur R. (2004). A Productive Investment: Early Child Development, in World Bank, Early Childhood Development From Measurement to Action: A Priority for Growth and Equity, (Washington: The World Bank)

system. While some regional agreements have shown promising outcomes, these agreements are not a blanket solution to the problems identified in this evaluation. The context of each regional agreement is different, and involves communities with unique histories and cultures. The manner in which these agreements are negotiated can influence how communities feel about them once they are in place.

One community participating in this evaluation that was a member of a regional agreement stated that they were never involved in any negotiations of their formal agreement with the third party and the Government of Canada, and they had never seen a copy of their agreement. The agreement also resulted in the community losing crucial funding for wrap-around services, as they lost the ability to run deficits where needed to keep programs running.

Decision-making on the allocation of limited funds will be difficult in any context, and First Nation schools have expressed frustration with their Band councils, education governing bodies and provincial ministries, in addition to ISC. Very often the concerns expressed are similar – decisions made that educators find detrimental to the wellbeing of students (reductions in teaching assistants, various transportation costs not approved, the elimination of positions due to lack of financial resources, etc.). It is therefore important that devolution of control, including through regional or other types of education agreements, not be considered a solution in and of itself. Rather, devolution and the agreements that support First Nations control of First Nations education offer one key approach to strengthening self-determination, but challenges may persist nonetheless. Extensive cooperation, investments, and capacity development must be integral parts of new approaches to First Nation education funding.

With limited or no additional funds for any given First Nation at the outset of many of these agreements, First Nation education administrators interviewed indicated that the added autonomy was to the organisation conducting negotiations on behalf of First Nations, and not always or necessarily to the First Nation. In many cases, significant funding decisions were made that were not supported by the band, and that did not adhere to their priorities, so in effect they were signing agreements for decisions to be made by another administrative body that, while Indigenous, was not felt by many interviewees to represent their communities. It was felt by several of the interviewees that agreements often increase competition between First Nations, where larger ones tend to achieve a better situation than smaller ones. Where the benefits to agreements are referenced, they mostly include some third-level services that decrease some of the administrative burden on the band.

In general, there was far more enthusiasm for regional agreements and aggregates among ISC regional staff than among First Nations. Government staff consistently stated that the agreements provide more flexibility, predictability and ultimately improved third-level services, and better enabled communities to place more emphasis on language and culture. There is limited evidence that this has occurred to date, and there was skepticism among First Nation administrators (outside of British Columbia) that were interviewed in this evaluation. It is too early to be able to measure such outcomes, as agreements (other than British Columbia's,

which is long-standing) are still in their infancy, and there are very few agreements against which to measure progress.

Importantly, to both advance the self-determination of Indigenous peoples through education agreements, and simultaneously strengthen the stability of education administrations on reserve, it is essential to ensure that no school or community will benefit less from an education agreement than from their previous funding arrangements. It is also important to ensure communities that are part of an agreement are aware of the level of autonomy they will have in an agreement, and are given adequate time and opportunity to consider these implications, be a meaningful player in negotiations and make informed choices. Finally, First Nation administrators who were interviewed expressed concern about having to go through designated organisations to be heard in engagements. If they feel their interests are not adequately represented by these organisations, they face significant difficulty having their points heard if those interests are not shared by the designated organisation.

## 2.5 High-Cost Special Education

**Finding 5: The demand often exceeds availability of funding in accessing services and procuring adequate funding for students with special needs on reserve, and these barriers are greater than those typically faced off reserve. Program policies also create an obstacle by requiring the disability to be 'moderate to profound,' irrespective of actual cost.**

The demand for High-Cost Special Education services for First Nations is high, and on-reserve schools have many students with conditions requiring accommodation. All interviewees stated that high-cost special education was a major cost driver for their schools, and that, in general, the availability of services for these students is greater in the provincial school system. There are needs that students have that communities struggle to meet due to a lack of funding, infrastructure and isolation, and some have gone so far as to find other sources from private donors.

The program's distinction of a moderate to profound learning disability for eligibility for High-Cost Special Education funding was identified as problematic. Many students lack a diagnosis for a moderate to profound learning disability, but still require high-cost academic or behavioral supports that are similar to some of the services needed for those diagnosed with 'profound' disabilities. There is difficulty finding adequate funding for these supports, which has negative implications for both the students with needs and those in their classrooms.

Specifically, interviewees indicated that, in general, children on reserve have moderate access to basic medical services, basic counselling, some mentoring and cultural services, psycho-educational testing, basic occupational therapy and general in-class support. In contrast, off

reserve they have access to these services, and they have far more access to pediatricians, medical specialists, trauma-informed counselling, autism services, strategies for students with severe behavioural issues and hubs of children's services. The consequences of this are that parents are often not connected and engaged with early intervention strategies until after kindergarten, and are significantly behind in terms of early diagnosis, assessment and treatment.

The most commonly cited issue with High-Cost Special Education was the fact that it is largely proposal-based, which is administratively burdensome, putting school administrators in the position of seeking approval for funding and providing evidence as to how much is needed every year – a scenario that is far less likely off reserve, with a more reliable budgetary base for special education writ large. Additionally, core funding for the level of service needed by qualified personnel to work with students with special needs is extremely limited.

Beginning in July 2016, the Government of Canada began flowing money through a fund of \$382.5 million from Jordan's Principle. The purpose was to provide immediate support for children in need of a wide range of services related to health, education and social needs. The intent going forward is to build better structures and funding models to better ensure First Nation children have access to the products, services and supports they need, when they need them.

The extent to which this funding has provided, or can be reasonably expected to continue to provide, improvements in this regard has yet to be fully understood. However, given the integral role of special education in the education system, and its associated costs, a clear and comprehensive strategy would help to ensure that special education is fully integrated in a school's operations and equitable to what a student would have off reserve.

### **3. Conclusions and Recommendations**

Past evaluations and reviews of elementary/secondary education programs have delved into the details of the reality of First Nation learners, informed largely by Indigenous-led research. They have also included analysis to make specific observations on each sub-program. The common conclusions have most often been that there is insufficient funding and a lack of self-determination inherent in program design. This evaluation sought to move beyond these issues, acknowledging from the outset that a complete restructuring is desired by the Government of Canada and Indigenous governments and partners.

Ultimately, this evaluation concludes that the status quo of the approach to education program support will not lead to desired outcomes, and will not support reconciliation and self-determination. Results for First Nation learners have not shown improvement over recent years. Juxtaposed against significant funding increases in that time, it is clear that a farther reaching and systemic change is needed. This applies to all sub-program elements under the elementary/secondary portfolio. The evaluation team is aware that ISC and First Nations have

co-developed a transformative approach to funding education on reserve that was launched in 2019-20, and the results of such a change will be examined when the program is next evaluated.

The approach to overhauling ISC's approach to education must be carefully considered and co-developed with First Nations. Simple devolution through regional or other education agreements does not constitute a solution in and of itself, but rather must be part of a broader effort to strengthen the capacity of organisations and communities, and approach education on reserve through a trauma and healing-based lens.

It is therefore recommended that ISC:

- 1) Work with First Nations and government partners to explore, identify, and assess specific funding gaps of elementary and secondary education for First Nations, including sufficient investments for capacity and service needs such as, parental engagement, culture and language, as well as transportation and infrastructure considerations.
- 2) Work with First Nations and government partners on an ambitious policy framework, which aims to tackle early learning gaps and service needs, including the integration of early childhood education, using more flexible funding approaches for First Nations, and taking into consideration transportation and infrastructure challenges.
- 3) Work with First Nations and government partners on a clear and comprehensive strategy to support First Nations in addressing special education needs at or beyond levels to those offered off-reserve.
- 4) Work with First Nations and other ISC sectors as appropriate to integrate trauma and healing-based approaches to education support, which contribute to restoring and strengthening pride, identity, and self-determination.
- 5) Invest in communications with regional partners and First Nations to improve relationships and understanding, and to further advance reconciliation.