



First Nations Inclusive Education Costing Summary Report

Assembly of First Nations
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Prepared by MNP LLP.



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1.0 Executive Summary

MNP LLP (MNP) has been engaged by the Assembly of First Nations (AFN) to conduct an analysis regarding the costs involved in the provision of Inclusive Education services.

Inclusive Education in First Nations communities ensures children of all ages are given a fair chance to go to school and develop the skills they need to thrive in their communities. It also is meant to create a learning environment that allows all children to integrate and participate in school activities. The use of the term “inclusive education” should not be limited to meeting the individual learning needs of First Nations students who have mild, moderate, or severe disabilities, but rather reflect a strength-based approach to education, recognizing the diverse First Nations’ understandings of ability, disability, and gifts.

As part of the analysis, MNP collected cost information through 22 surveys and 10 interviews with First Nations education organizations, as well as primary and secondary research from provincial school jurisdictions, Inclusive Education advocacy organizations, professional associations, providers of specialized services and equipment, and other stakeholders.

The general structure of Inclusive Education costs in First Nations operated school systems is outlined in the visual below.¹

Permanent Staff Salaries	Specialized Services	Equipment and Resources	Cultural Resources	Other Expenses
Inclusive Education Coordinator	Assessments	Classroom Equipment and Resources	Elders and Knowledge Keepers	Professional Development
Special Education Teachers	Physiotherapy	School Equipment and Resources	Cultural Ceremonies/ Traditional Wellness and Healing	Inclusive Education Documentation
Education Assistants	Occupational Therapy			Community Engagement
Counsellors/Community Liaison Workers	Speech-Language Pathologists			Case Management
Assistant Speech-Language Pathologists	Psychology			
INCLUSIVE EDUCATION INFRASTRUCTURE				

The key cost drivers affecting the above Inclusive Education costs are:

- **Location (province/territory):** Compensation of permanent staff and hourly fees of specialized service providers significantly vary from province to province.
- **Remoteness (proximity to urban centres):** The difficulty to attract qualified staff to remote locations is usually compensated by offering higher wages and hourly fees to staff and specialized service providers. Further, remote First Nations incur additional travel expenses when bringing contracted specialists to the Nation or offering professional development opportunities.

¹ Since infrastructure costs vary substantially based on age and layout of existing school building, First Nation’s location, they were identified, but not quantified as part of the model.



- **Incidence of students with special needs:** A high number of students with special needs necessitates a higher number of Special Education Teachers and Education Assistants, which increases the salary costs in First Nations. In addition, it drives the costs of specialized services, targeted professional development, and case management.
- **Number of schools:** Some costs are correlated with the number of schools served by a First Nations education organization. For example, operating schools in multiple communities increases costs associated with community engagement, as well as cultural expenses (e.g., having an Elder in each school involved in various healing and wellness activities). It also drives resource and policy development expenses since each Inclusive Education handbook, guide, or resource needs to be tailored to varying community contexts, student population, grade levels served etc.
- **Student enrolment:** With 70 percent of First Nations communities having less than 500 inhabitants, First Nations school jurisdictions have much lower enrolments and smaller operations. As a result, they do not benefit from economies of scale the way their provincial counterparts do. Lack of economies of scale significantly increases staffing costs, costs of specialized services, professional development, and resources and materials.

Using the principle of substantive equality, the Inclusive Education cost model is based on First Nations' needs and leading practices across Canada. While provincial benchmarks, common practices, and standards were referenced as part of MNP's analysis, the specific costs and ratios in the cost model are meant to address current inequalities and bridge the outcome gaps for First Nations students.

Based on the model, the highest per-student costs are incurred in an isolated community with low student population and high percentage of students with special needs, while the lowest costs are generated for a large education organization in close proximity to urban centres and low incidence of students with special needs.

The sample cost calculations derived from the model for three First Nations education organizations, as well as their respective funding are presented in the table below. Since the number of students with special needs has the highest impact on costs generated through the model, for comparison purposes it was assumed that the incidence rate of special needs students for all three organizations is the same:

- Students with mild and moderate special needs comprise 20% of total enrolment.
- Students with severe and profound special needs comprise 5% of the total enrolment.



TABLE 1: SAMPLE RESULTS GENERATED BY INCLUSIVE EDUCATION COST MODEL VS. CURRENT FUNDING

First Nation Examples	Small Fly-in First Nation in Ontario	Large Remote First Nation Education Authority in Alberta	Mid-sized First Nation close to a major urban center in Alberta
SUMMARY RESULTS (per Student)			
Permanent Staff Salaries	\$13,988	\$6,646	\$5,418
Specialist Services (Contracted)	\$4,975	\$3,028	\$2,306
Equipment and Resources	\$943	\$554	\$469
Cultural Needs	\$897	\$283	\$496
Other Expenses	\$1,343	\$401	\$517
Model Generated Costs Per Student	\$22,148	\$10,911	\$9,206
Model Generated Costs for School	\$3,455,025	\$13,508,151	\$3,894,172
Current Funding Per Student*	\$4,675	\$2,938	\$3,445
Current Funding for School*	\$729,295	\$3,637,538	\$1,457,345

*The current funding figures for inclusive education costs include funding from the interim funding formula, which does not represent all inclusive education funding sources. Students may still access proposal-based programs such as the High-Cost Special Education Program (HCSEP) and Jordan's Principle.

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2.0 Introduction

Inclusive Education in First Nations communities ensures children of all ages are given a fair chance to go to school and develop the skills they need to thrive in their communities. The use of the term “inclusive education” reflects a strength-based approach, recognizing the diverse First Nations’ understandings of ability, disability, and gifts.

The Interim Funding, which is based on the provincial comparability formula, falls short in addressing the unique inclusive education cost drivers experienced by First Nations, such as scarcity of qualified staff within remote First Nations communities, higher incidence rate of students with special needs, and additional costs stemming from lack of economies of scale.

To supplement their funding, First Nations rely on the High Cost Special Education Program (HCSEP), and Jordan’s Principle funding. The HCSEP funds additional services for students assessed with moderate to profound learning disabilities. While Indigenous Services Canada (ISC) still requires First Nations to submit their HCSEP workplans (proposals), their impact on the actual funding amounts received is very limited.

Jordan’s Principle has become a key funding source for expenses related to Inclusive Education, including the hiring of speech and language therapists, occupational therapists, and mental health counselors, conducting assessments, etc. In the 2021-22 fiscal year alone, the Jordan’s Principle funding for education products and services approved through group and individual requests equaled \$47,850,048 and \$79,045,633 respectively. Notably, individual education requests saw a 56% increase of approved funds from 2020-21.² This data suggests that First Nations require an ongoing, consistent solution to meet the needs of students, without facing administrative challenges.

The ISC Memorandum to Cabinet (MC) on Transforming First Nation Education (2017) and the First Nations Policy Proposal (2017) outlined that a review must be conducted on HCSEP. In 2020, the Assembly of First Nations (AFN) completed a review of special education funding. The review included assessing funding provisions and cost drivers, identifying factors that support or impede achievement of the program’s objectives, evaluating the effectiveness of the HCSEP, and identifying improvements and recommendations for HCSEP policy changes to better meet its primary focus. Among many other insights and recommendations, the final report stemming from this review concluded that the “per student special need component needs to be adjusted by a factor of at least three to close the funding gap for service delivery.”

Building on qualitative analysis completed as part of the 2020 Review, AFN engaged MNP LLP (MNP) to perform the Inclusive Education Costing Analysis. Specifically, MNP:

- Defined cost elements within Inclusive Education, including costs associated with creating an inclusive learning environment.
- Collected estimates for each of the identified Inclusive Education cost elements, adjusted by student needs, remoteness, size of the student population, etc.
- Developed a needs-based and equitable Inclusive Education cost model, which can be used by First Nations to negotiate additional Inclusive Education funding as part of the Regional Education Agreement process and advocate for changes to HCSEP.

The summary report below is a companion document to the Excel-based cost model developed by MNP. The purpose of this report is to explain the rationale for each of the cost elements, as well as the underlying cost

² Indigenous Services Canada. Analysis of Jordan's Principle Administrative Data. Data Tables Fiscal Year 2021-22 (April 1, 2021 to March 31, 2022)

drivers and assumptions the model is based on.

3.0 Project Scope

3.1 Definition of Inclusive Education

According to the United Nations Children's Fund (UNICEF), "Inclusive Education means all children in the same classrooms, in the same schools."³ A similar definition is used by Inclusive Education Canada: "It [Inclusive Education] means that all students attend and are welcomed by their neighbourhood schools in age-appropriate, regular classes and are supported to learn, contribute and participate in all aspects of the life of the school."⁴

Unlike Special Education, the provision of Inclusive Education is not limited to meeting of the individual learning needs of First Nations Students who have mild, moderate, severe disabilities, or gifted/talented abilities. It also is meant to create a learning environment that allows all children to integrate and participate in school activities.

The provision of Inclusive Education is therefore linked to the basic rights that children have access to education. In Canada, the right to education is contained within provincial and territorial education acts. In addition, human rights acts ensure both access as well as protection from discrimination. This right was further validated by the Supreme Court of Canada (SCC) in 2012, as it handed down the decision in the *Moore vs B.C.* case, which stated that students with special needs are entitled to receive the accommodation measures they need to access and benefit from the service of public education.⁵

Teachers and school staff work as part of a multidisciplinary, collaborative team with other professionals in the provision of Inclusive Education. These may include psychologists, speech and language therapists, physiotherapists, occupational therapists, childcare workers, nurses, behavioural consultants, doctors, and social workers, as well as others.

3.2 Scope of Inclusive Education Costing

Based on the definition above, Inclusive Education is a very broad and complex area. Many costs which are partially attributed to creating an inclusive learning environment are meant to be captured within other areas of the Interim Funding Formulas, such as Base Instruction Funding, Socio-Economic Status Funding, Language and Culture Funding, English as a Second Language Funding or Geographic Grants. Examples of such costs include:

- Literacy and numeracy teachers, resources, and materials, which are generally meant to be covered through Base Instruction Funding;
- Specialized health supports (e.g., vision and hearing screening), which are meant to be covered by Health Canada;
- General technology purchases (computers or iPads), which serve a variety of purposes, beyond the needs of Inclusive Education;

³ UNICEF (2023). Inclusive Education Program. <https://www.unicef.org/education/inclusive-education>

⁴ Inclusive BC (2023). Inclusive Education. <https://inclusionbc.org/our-resources/what-is-inclusive-education/>

⁵ Inclusive Education Canada (2023) What is Inclusive Education? <https://inclusiveeducation.ca/about/what-is-ie/>

- The vast majority of First Nations language and culture programming costs (e.g., land-based education initiatives, curriculum development, salaries of language instructors);
- Third-level services related to developing curriculum and standards for Inclusive Education;
- English as a second-language programming and supports;
- Professional development activities, which are not directly related to Inclusive Education; and
- High cost specialized assistive devices and equipment for each student with disabilities (chair lift, or any lifting devices, dialysis equipment, wheelchairs, cranes, stair lifts, etc.)

The costs above have not been included in the Inclusive Education cost model.

3.3 Needs-Based Approach

In its 2022-23 Departmental Plan, ISC commits to taking a substantive equality approach to minimize gaps and barriers in accessing services, including education.⁶

Substantive equality is the recognition that not all people start off from the same position and that these unequal needs make it more difficult for some to be successful. Treating everyone the same is only fair if they are starting from the same position. Substantive equality seeks to address the inequalities that stem from an individual's particular circumstances, to help put them at the same position and give them the same opportunities as others.⁷

Using the principle of substantive equality, the Inclusive Education cost model is intended to be based on First Nations' needs and leading practices across Canada. While provincial benchmarks, common practices, and standards have been referenced as part of MNP's analysis, the specific costs and ratios for staffing and resources are meant to address current inequalities and bridge the outcome gaps for First Nations students.

⁶ Indigenous Services Canada 2022-23 Departmental Plan <https://www.sac-isc.gc.ca/eng/1642087807510/1642087838500>

⁷ Jordan's Principle: substantive equality principles <https://www.sac-isc.gc.ca/eng/1583698429175/1583698455266#:~:text=Substantive%20equality%20is%20the%20recognition,starting%20from%20the%20same%20position.>

3.4 Methodology

The methodology used for the First Nations Inclusive Education Costing Analysis is outlined in Figure 1 below and a description of each component follows.

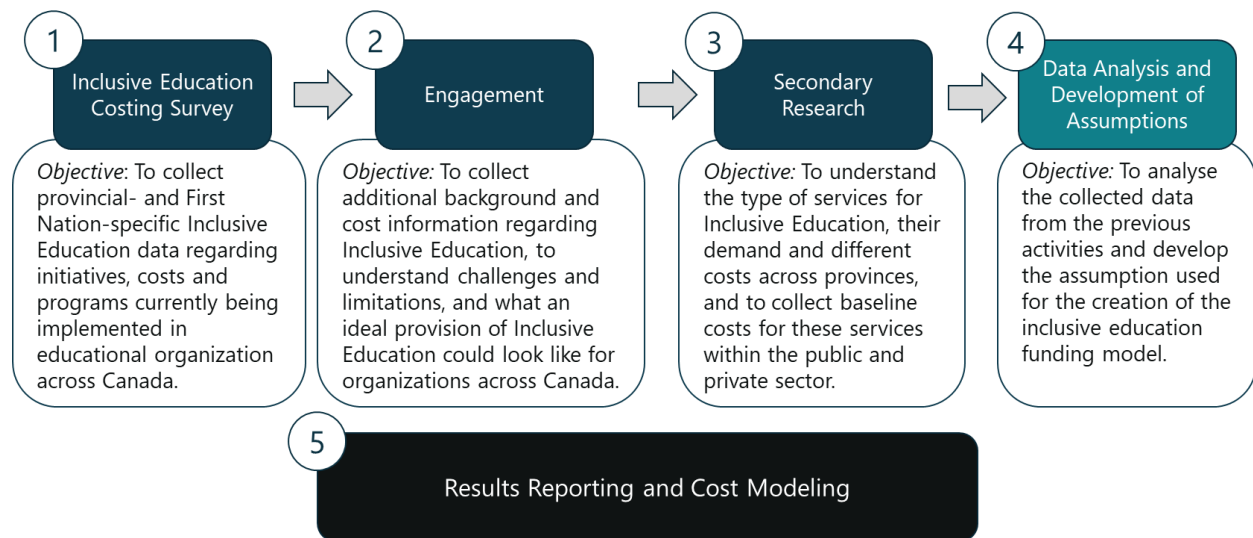


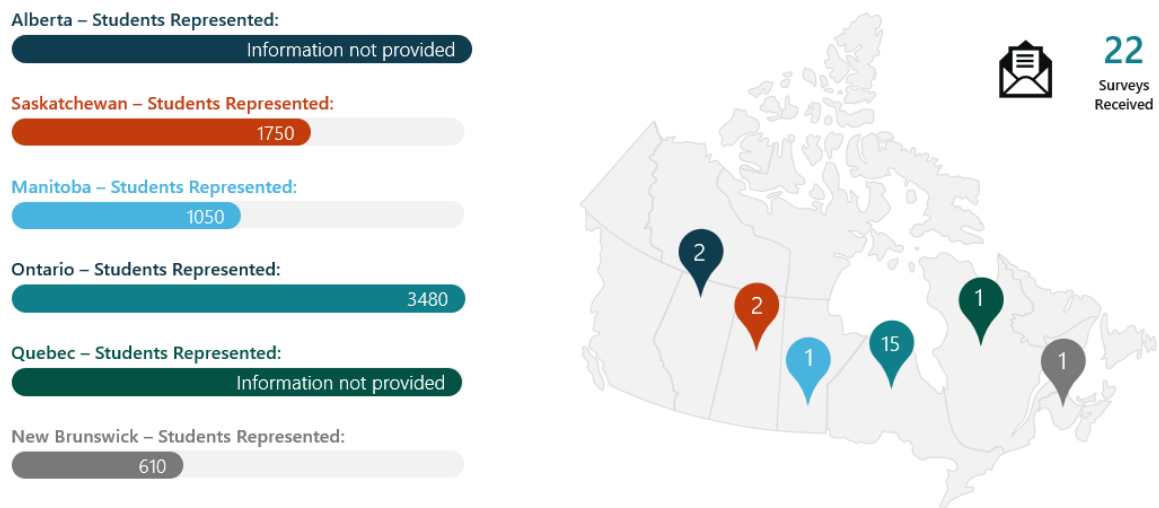
FIGURE 1: FIRST NATIONS INCLUSIVE EDUCATION COSTING METHODOLOGY

3.5 Components of the Study

3.5.1 Inclusive Education Costing Survey

MNP, in collaboration with AFN, developed the survey, which was composed of over 50 questions ranging from Inclusive Education resources and materials currently available at each organization to staffing, case management and infrastructure in place for the provision of Inclusive Education, and their associated cost.

The surveys were distributed to First Nations education organizations through the First Nations Education Administrators Association (FNEAA) and a total of 22 responses were received. Figure 2 provides information regarding the number of respondents, as well as number of students they represented in each province:



* Number of students represented is only a minimum estimate, as some organizations did not provide this information.

FIGURE 2: NUMBER OF STUDENTS REPRESENTED PER PROVINCE BY RESPONDENTS OF THE SURVEY

3.5.2 Interviews

The goal of the engagement phase of this project was to further connect with organizations who provide Inclusive Education services (public, private, and First Nations) to understand what these services entail from a financial standpoint, but also within the context of their specific province, community, etc. Through specific questions developed in collaboration with AFN, MNP was able to gather information regarding current Inclusive Education initiatives in place, the challenges and barriers organizations face, the desired future state of what Inclusive Education could look like, as well as the financial cost to implement, develop and sustain.

In total, 22 interviews were conducted. Table 1 below provides information regarding the geographical distribution of the responses received:

TABLE 2: GEOGRAPHICAL DISTRIBUTION OF FIRST NATIONS ORGANIZATIONS ENGAGED

Province	Number of Interviews Conducted	Characteristics
Manitoba	1	<ul style="list-style-type: none"> Manitoba education organization
Alberta	4	<ul style="list-style-type: none"> Remote First Nations education authority operating six schools First Nations education authority operating ten schools First Nations with three schools located close to a large urban center Isolated/remote single-Nation Education Authority with four schools
New Brunswick	1	<ul style="list-style-type: none"> First Nation Education Organization

Ontario	1	<ul style="list-style-type: none"> • First Nation Education Organization
Atlantic Region	1	<ul style="list-style-type: none"> • A single-First Nation education authority
Yukon	1	<ul style="list-style-type: none"> • First Nations school Board
Saskatchewan	1	<ul style="list-style-type: none"> • Remote First Nations education authority operating four schools
Total	10	

TABLE 3: GEOGRAPHICAL DISTRIBUTION OF NON-FIRST NATIONS ORGANIZATIONS ENGAGED

Province	Number of Interviews Conducted	Characteristics
Alberta	3	<ul style="list-style-type: none"> • One school board and two service providers
British Columbia	3	<ul style="list-style-type: none"> • School boards and a service provider
Manitoba	3	<ul style="list-style-type: none"> • Three school boards
New Brunswick	1	<ul style="list-style-type: none"> • Subject matter expert
Ontario	1	<ul style="list-style-type: none"> • Subject matter expert
Saskatchewan	1	<ul style="list-style-type: none"> • School board
Total	12	

3.5.3 Secondary Research

The goal of the secondary research was to compile information and conduct a benchmarking exercise on the cost to provide different types of Inclusive Education services through private, third-party companies across provinces. This research included the review of the costs across provinces for delivering services provided by specialists such as Speech and Language Therapists, Physiotherapists, Occupational Therapists, Psychologists, Behavioral Therapists, Counselors, and/or Social Workers, as well as the review and analysis of provincial standards and reports issued by regulatory bodies, specialists associations and Inclusive Education networks.

This research was conducted to ensure that the cost model incorporates the additional cost that organizations incur when contracting this type of services to third party companies due to staff limitation within their own organizations.

3.5.4 Cost Modeling

The final stage of the project involved the development of this report, as well as an Excel-based Inclusive Education cost model. The cost model was built using the information collected through the survey, interviews, and the jurisdictional scan. The cost model will allow individual First Nations school jurisdictions to calculate their total Inclusive Education costs by inputting the following information:

- The number of schools;
- The total number of students in Grades K to 6;
- The total number of students in Grades 7 to 12;
- The number of students with special needs; and
- The number of schools.

3.6 Data Limitations

The information included in this report is based on input from First Nations education organizations in Alberta, Manitoba, Ontario, Saskatchewan, Atlantic Region, and Yukon.⁸ Attempts were made to ensure an even geographical distribution of the collected primary data; however, the number of responses from Saskatchewan or Atlantic Region were much lower compared with Alberta and Ontario.

Additionally, data collected as part of secondary research was compiled based on publicly available information and may not be reflective of the total costs involved in the provision of services.

Additional limitations are related to data inconsistencies, as information collected varied considerably from province to province and from organization to organization. For example:

- Some First Nations participants were able to quantify their needs in terms of staffing ratios, or the actual costs, while others were only able to provide qualitative answers/descriptions of desired future state; and
- While larger First Nations could reference the costs from their Inclusive Education-specific budgets, smaller First Nations had Inclusive Education costs lumped together with other instructional expenses.

Further, it is important to note that this model does not quantify the needs of First Nations that do not have their own schools. While there were 10 survey respondents which did not have schools, the data on types of Inclusive Education services provided and the associated costs was inconclusive. The majority of participants identified the need for cultural supports, mental health services and Education Assistants, however additional research and community engagement is required to better understand:

- To what extent services provided by provincial school boards address the needs of First Nations students; and
- What the incremental costs of supplementing these existing services are.

Lastly, while the model covers most costs to provide school-based services to students with severe/profound special needs, such as cerebral palsy, hydrocephalus etc., it does not cover high-cost assistive technology and equipment (wheelchairs, lifts, etc.).

⁸ Information from British Columbia and Quebec First Nations was not collected, or included in this report, as these provinces opted not to participate in this project.

4.0 Overview of Inclusive Education Costs

4.1 Cost Structure

Based on information collected through the secondary research, surveys, and engagement with First Nations organizations and other Inclusive Education Service providers, MNP developed a cost model, the general structure of which is provided below:

FIGURE 3: COST MODEL STRUCTURE

Permanent Staff Salaries	Specialized Services	Equipment and Resources	Cultural Resources	Other Expenses
Inclusive Education Coordinator	Assessments	Classroom Equipment and Resources	Elders and Knowledge Keepers	Professional Development
Special Education Teachers	Physiotherapy	School Equipment and Resources	Cultural Ceremonies/ Traditional Wellness and Healing	Inclusive Education Documentation
Education Assistants	Occupational Therapy			Community Engagement
Counsellors/Community Liaison Workers	Speech-Language Pathologists			Case Management
Assistant Speech-Language Pathologists	Psychology			
INCLUSIVE EDUCATION INFRASTRUCTURE				

The key cost drivers affecting the above Inclusive Education costs are:

- **Location (province/territory):** Compensation of permanent staff and hourly fees of specialized service providers significantly vary from province to province.
- **Remoteness (proximity to urban centres):** The difficulty to attract qualified staff to remote locations is usually compensated by offering higher wages and hourly fees to staff and specialized service providers. Further, remote First Nations incur additional travel expenses when bringing contracted specialists to the Nation or offering professional development opportunities.
- **Incidence of students with special needs:** A high number of students with special needs necessitates a higher number of Special Education Teachers and Education Assistants, which increases the salary costs in First Nations. In addition, it drives the costs of specialized services, targeted professional development, and case management.
- **Number of schools:** Some costs are correlated with the number of schools served by a First Nations education organization. For example, operating schools in multiple communities increases costs associated with community engagement, as well as cultural expenses (e.g., having an Elder in each school involved in various healing and wellness activities). It also drives resource and policy development expenses, as each Inclusive Education handbook, guide, or resource needs to be tailored to varying community contexts, student population, grade levels served etc.
- **Student enrolment:** With 70 percent of First Nations communities having less than 500 inhabitants, First Nations school jurisdictions have much lower enrolments and smaller operations. As a result, they

do not benefit from economies of scale the way their provincial counterparts do. Lack of economies of scale significantly increases staffing costs, costs of specialized services, professional development, and resources and materials.

TABLE 4: SUMMARY OF KEY DRIVERS OF INCLUSIVE EDUCATION COSTS

Cost Element	Location (Province)	Remoteness (proximity to urban centres)	Incidence of students with special needs	Number of Schools/Communities	Student Enrolment
Permanent Staff Salaries	✓	✓	✓		✓
Specialized Services	✓	✓	✓		
Equipment and Resources				✓	✓
Cultural Resources				✓	✓
Other Expenses: Professional Development		✓	✓		✓
Other Expenses: Inclusive Education Documentation				✓	✓
Other Expenses: Community Engagement				✓	✓
Other Expenses: Case Management			✓		

4.1.1 First Nations Inputs

The inputs to be entered by First Nations are closely tied to the cost drivers described above and include:

- Location: Name of a First Nation and Province
 - Name of a First Nation helps generate the remoteness adjustment, which is pulled from 2018 ISC Cost Adjustment Factor Based on Remoteness.
 - ISC's Model for Cost Adjustment Factors Based on Remoteness estimates cost adjustments for funding based on location using a combination of the Remoteness Index and whether the community is isolated (Fly-in) or not. First Nation's Adjustment Factors range from 5 percent to 133.6 percent with a median of 33.4 percent.
- Number of students enrolled in First Nations-operated schools (as per nominal roll):
 - The number of students in kindergarten to Grade 6.
 - The number of students in Grades 7 to Grade 12.
- Number of special needs students (based on ISC classification):
 - The number of students with mild/moderate disabilities (students with HCSEP program codes in the 50s range (51/52, 59, 58, 55, 56, 57, 53)).
 - The number of severe/profound disabilities (students with HCSEP program codes in the 40s range (41, 42, 43, 44, 45, 46, 47)).

- Number of First Nations-operated schools.
- Number of classrooms (the default option is 17 students per classroom):⁹
 - If the user believes that the calculated number of classrooms does not accurately reflect the true number of classrooms, there is an option to input the number of classrooms manually.

⁹ This figure may vary as the number of students per classroom is subject to provincial ratios and/or can be the result of negotiated ratios as part of the Regional Education Agreement ('REA').

4.2 Description of Cost Elements

4.2.1 Permanent Staff Salaries

Permanent staff salaries component of the cost model includes salaries of staff who are employed by First Nations and involved in day-to-day delivery of Inclusive Education services in First Nations schools:

- Inclusive Education Coordinators;
- Special Education Teachers;
- Education Assistants;
- Counselors; and
- Speech and Language Therapy Assistants.

These permanent positions are entitled to benefit coverage (estimated at 20% of base salary), CPP, and EI contributions, and professional development allotment.

4.2.1.1 Inclusive Education Coordinator

Every school jurisdiction, regardless of size, needs a champion for inclusion, who would assume a lead role in the capacity building of inclusive practices within the school and community. While all First Nations participants reported needing an Inclusive Education Coordinator, not many had one.

In a larger school jurisdiction (1,000+ students) this role typically reports to the Associate Superintendent or Director of Learning (or Student Services), while in smaller school jurisdictions this role reports directly to the Director of Education.

Specific responsibilities of Inclusive Education Coordinators include, but are not limited to:

- Work collaboratively with teachers, administration, Education Assistants, and other professionals to optimize the potential for student success;
- Serve as a key member and leader of the student Case Management team;
- Play a lead role in organizing and implementing interventions for student academic success;
- Oversee and coordinate specialized services (e.g., SLP, OT, PT, assessments);
- Coordinate and assist with Individual Program Plans (IPP);¹⁰
- Coordinate with agencies involved in service provision including health providers, federal government representatives, child and family services, etc.; and
- Facilitate or coordinate required Inclusive Education training for school staff.

Based on interviews with First Nations and provincial school jurisdictions, a qualified candidate for this position must be an experienced certified teacher, preferably with a Master's degree in Curriculum/Instruction or Special Education, and/or Special Education designation. Further, they need to have a passion for Special Education and an understanding on how to navigate public policy.

Given the described qualifications of an ideal candidate for the Inclusive Education Coordinator position, their compensation is estimated to reflect the following:

¹⁰ Individual Program Plans (IPP) is also known as Individual Education Plan (IEP), Special Education Plan (SEP), Individualized Program Plan (IPP), Student Support Plan SSP, Individual Support Services Plan (ISSP) depending on the province or territory.

- Compensation level must align with the maximum salary a teacher can receive based on the salary grid in any given province/territory (typically reached at 7 years of experience and Master's level education).

The maximum annual salaries for Inclusive Education Coordinators range from \$89,530 in New Brunswick to \$109,094 in Manitoba.^{11,12} An additional allowance may also be applicable to reflect additional coordination responsibilities.

4.2.1.2 Special Education Teachers

The Special Education Teacher (often referred to as a "Resource Teacher") is the in-house expert on meeting the needs of diversified learners. This teacher reports to the Inclusive Education Coordinator and ideally should not have a classroom assignment attached to their role. Further, they should not be preoccupied with excessive reporting, which is currently the case in many First Nations. Rather, Special Education Teacher's roles and responsibilities should include, but are not limited to:

- Employing specialized instruction to meet the goals of students' Individual Program Plans (IPP);
- Managing Individual Program Plans;
- Scheduling team meetings to develop instructional goals and strategies;
- Providing Level Two assessments;
- Providing direction and supervision of Educational Assistants; and
- Working directly with special needs students.

The key factor driving the need for Special Education Teachers is their "caseload" (number of students with special needs attending the school). Given that special needs placement and identification in First Nations elementary and secondary schools are 2-3 times the rate of provincial K-12 schools, the need for Special Education Teachers in First Nations schools is substantially higher.¹³

The Special Education Teacher position typically requires a Bachelor of Education degree. While a Master's degree in Special Education is considered an asset, having it was uncommon in both First Nations and provincial school jurisdictions. Based on these parameters, the salary for Special Education Teachers is calculated as a midpoint of the salary grid for teachers in each specific province.

The annual salaries for Special Education Teachers range from \$56,383 in New Brunswick (mid-point of the teacher salary grid),¹⁴ to \$79,757 in Alberta (the mid-point of the teacher salary grids of Calgary Board of Education and Edmonton School Division).¹⁵

¹¹ Agreement Between Treasury Board and the New Brunswick Teacher's Federation (2016 to 2021). Available at: <https://www2.gnb.ca/content/dam/gnb/Departments/ohr-brh/pdf/ca/201.pdf>

¹² Collective Agreement between the Winnipeg School Division and the Winnipeg Teachers' Association of the Manitoba Teacher's Society (2018 to 2022). Available at: <https://sbwsdstor.blob.core.windows.net/media/Default/medialib/wta-collective-agreement-2018-to-2022-february-2-2022.b191cf23359.pdf>

¹³ Assembly of First Nations (2012). Chief's Assembly on Education – A Portrait of First Nations and Education. https://www.afn.ca/uploads/files/events/fact_sheet-ccoe-3.pdf

¹⁴ See Note 7.

¹⁵ Collective Agreement between the Board of Trustees of the Calgary School Division and the Alberta Teachers' Association (2018 to 2020). Available at: <https://cbe.ab.ca/careers/Documents/Collective-Agreement-CBE-ATA.pdf>

4.2.1.3 Education Assistants

Education Assistants support students as part of a multidisciplinary team with teachers and other support personnel to provide meaningful instruction. Due to the high number of students requiring additional supports in classrooms, First Nations are heavily relying on Education Assistants hired locally to assist classroom teachers to carry out the following duties:

- Assist students in successful integration into the school and classroom;
- Prepare classroom material and supplies;
- Assist with behaviour management and supervise students in classroom, schoolyard, in the school and at out-of-school activities, as required;
- Help individual students or small groups as directed by the teacher;
- Assist students to learn and complete assigned activities and programmes under the direction of the Teacher; and
- Assist students with special needs according to their IPP goals and equipment.

Further, every student with a severe and profound disability should have a full-time Education Assistant to:

- Support them in the classroom environment to meet the goals and strategies identified on the IPP;
- Help the child with basic needs, such as eating, personal hygiene, or administering medications;
- Work with the child one-on-one, to enhance their learning or aid with behaviour regulation;
- Use assistive technology or equipment as required to support the student's learning and behaviour; and
- Provide observations and feedback to the teacher and early intervention coordinator on student behaviour to help monitor the child's progress.

While many First Nations currently employ a significant number of Education Assistants, these Assistants are often unqualified and do not have any training beyond a Grade 12 diploma. To be effective at their jobs, First Nations participants would like their Education Assistants to have an EA certification, and/or an Early Childhood Education Diploma.

The annual salaries of Education Assistants range from \$25,920 in Nova Scotia to \$47,923 in Alberta.^{16,17}

4.2.1.4 Counselors

Counselors are considered a Level Two support person (Level Two is the escalation team in an organization or specialists who are in charge of handling more complex cases) who works with individual students and student groups. First Nations participants felt that having an on-site Counselor is crucial to addressing the existing wellness and mental health issues among First Nations communities, which significantly worsened as a result of COVID.

¹⁶ Job Bank Labour Market Information. Educational Assistant in Nova Scotia. Available at: <https://www.jobbank.gc.ca/marketreport/wages-occupation/25517/NS>

¹⁷ Agreement between Calgary Board of Education and Calgary Board of Education Staff Association (2017 to 2020). Available at: <https://cbe.ab.ca/careers/Documents/Collective-Agreement-CBE-SA-Main.pdf>

The Counselor's role includes the following responsibilities:

- Counsel students who have personal, social, educational, or behavioural problems, with a focus on overall wellness. The topics include anger management, anxiety, stress management, life skills, emotion recognition, trauma etc.;
- Provide crisis intervention to students and/or their families;
- Act as family liaison, including home visits; and
- Be a key member of the case management team.

A Bachelor's degree in Counselling, Social Work or related field is considered as a requirement, whereas a Master's degree is an asset.

An important consideration regarding these positions is their wage, as it is considerably lower than the wage of a Teacher; however, in the opinion of some of the interviewees, this does not reflect the work they do, and some even consider it is parallel to Teacher's work, as Counselors, Community Liaison Workers and Social Workers provide counsel, are able to interact with kids within their homes, and also providing support for their families.

The annual salaries of Counselors range from \$52,000 in Saskatchewan to \$73,000 in Ontario.

4.2.1.5 Speech-Language Pathology Assistants

Due to the national shortage of Speech-Language Pathologists, paired with extraordinary demand for their services in First Nations communities, First Nations participants identified the need for each school to have a full-time Speech-Language Pathology Assistant (SLPA).

In hiring a SLPA, First Nations can extend services (i.e., increase the frequency and intensity of services to students), focus more on professional-level tasks, increase access to the program, and achieve more efficient and effective use of their time and resources.

Under the guidance and direction of a Speech Language Pathologist, SLPA's duties include:

- Creating speech/language materials;
- Developing plans for meeting the students' IPP goals;
- Implementing speech and language activities according to IPP goals; and
- Conducting individual or small group therapy sessions.

The annual salaries of Speech-Language Pathology Assistants range from \$59,342 in Quebec to \$72,000 in Saskatchewan.¹⁸

¹⁸ Job Bank Labour Market Information. Speech Therapist in Canada. Available at: <https://www.jobbank.gc.ca/marketreport/wages-occupation/22734/ca>

4.2.2 Specialized Services

Specialized services are available to students with sensory, physical, cognitive, or behavioural needs that require intensive, individualized interventions. These services include assessments, Physiotherapist (PT), Occupational Therapist (OT), Speech and Language Pathologist (SLP), Psychologist, etc. Unlike some universal supports, the costs of specialized services are directly linked to the number of students with special needs.

It is also important to note that 90% of First Nations participants, due to their remoteness and small size, do not have the ability to hire these professionals in-house and rely exclusively on contractors. The costs of contracted specialized services can be considerably higher as shown in the table below:

TABLE 5: COST COMPARISON OF IN-HOUSE VS. CONTRACTED SPECIALIZED SERVICES

Specialized Service	In-house Services - Hourly Average ¹⁹	Contracted Services - Hourly Averages
Psychologist	\$43.50	\$120 - \$275
Speech and Language Pathologist	\$44.00	\$90 – \$165
Occupational Therapist	\$41.32	\$70 – \$200
Physiotherapist	\$40.21	\$58 – \$160

4.2.2.1 Assessments

Students with special needs are referred for specialized assessments such as Psycho-Educational assessments, Speech and Language assessments, Physical Therapy assessments, and Occupational Therapy assessments, among others. Having assessments performed in a timely manner is key to ensuring adequate access to services and enabling special needs students to succeed in the long-term. The assessments also trigger student's placement on IPP and enable access to a variety of specialized services described below.

First Nations participants reported that every year an average of 10% of students on the Nominal Roll require an assessment, which includes both:

- Assessing students, who are already coded and have IPP in place. Typically, psycho-educational reassessments need to be completed every three years; and
- Assessing new students, who are yet to be placed on IPPs.

In First Nations, as well as many provincial school jurisdictions, assessment services are contracted out and conducted by qualified professionals (e.g. Registered Psychologists) who have a Master's Degree, and experience in conducting specialized assessments and providing an interpretive report of the results.

On average, the cost per assessment ranges from \$2,000 to \$3,410.

4.2.2.2 Physiotherapy (PT)

Physiotherapy is important for individuals who are diagnosed with disabilities that affect their mobility functioning (e.g., motor development, developmental skills, balance and coordination, strength, and endurance). Students can often be treated by a general practice PT but can be referred to a PT that specializes

¹⁹ Averages obtained from Job Bank Canada.

in assisting students with learning disabilities on a case-by-case basis.²⁰

Contributions that a Physiotherapist can make in the school environment include:²¹

- Provide recommendations to the school to assist the student to achieve maximum function at school;
- Program planning (promoting range of motion, mobility, balance and coordination);
- Identify strategies to create an accessible school environment;
- Recommending/adapting equipment to assist with mobility; and
- Educating school staff, caregivers and students.

Participants noted that special needs students requiring PT, on average need 30 minutes to one-hour sessions every week.

The salaries per hour for Physiotherapists externally contracted range from \$58 in Manitoba to \$160 in Ontario. The average salary across Canada for In-house Physiotherapist services is \$41.32.²²

4.2.2.3 Occupational Therapist (OT)

The Occupational Therapist's goal is to enable students to participate as fully as possible in the activities of everyday life, and to support children in continuing to grow and develop skills that support lifelong occupational engagement. OT provides function-based assessment, treatment, consultation, and education targeting specific goals. OT in a school environment allows students with special needs to participate more fully in school by improving their fine motor skills and ability to succeed in everyday activities.²³

Specific contributions that an OT can make in the school environment include:

- Assistance in the development of the individual learning profiles;
- Aid in the development of differentiated instructional strategies;
- Recommendations for materials, tools and/or technology to facilitate learning; and
- Participation in enhancing teacher capacity through collaborative work and the provision of resources.

OT can help students who have birth injuries or defects, sensory processing disorders, traumatic brain injuries, autism, and much more.²⁴ OT specialists assist with fine motor skills, handwriting skills, sensory processing, emotional regulation, play/social skills, self-care skills, medical equipment ordering and workshops.²⁵

According to First Nations interviewees, service providers and secondary research, best practice is for students identified to require OT treatment to receive between 30 minutes to one hour of service per week. It is noted that the frequency of therapy required varies case-by-case due to dependence on the severity and complexity of the case. Severe cases may require additional therapy time, which is set by the specialist on a case-by-case

²⁰ Physiopedia (2023). The Role of the Physiotherapist in Learning Disabilities: Communication and Health Literacy. https://www.physio-pedia.com/The_Role_of_the_Physiotherapist_in_Learning_Disabilities:_Communication_and_Health_Literacy

²¹ Southwest Community Access to Care Centre (2014). Physiotherapy (PT) in Schools. https://www.southwesthealthline.ca/healthlibrary_docs/ResourcesFactSheetPhysiotherapyinSchools.pdf

²² Job Bank Labour Market Information. Physiotherapists. Available at: <https://www.jobbank.gc.ca/marketreport/wages-occupation/18214/ca>

²³ CanChild (2023). Occupational Therapy Role In the School: Partnering for Change Model. <https://www.canchild.ca/en/resources/209-occupational-therapy-role-in-the-school-partnering-for-change-model>

²⁴ KidsHealth (2023). Occupational Therapy. <https://kidshealth.org/en/parents/occupational-therapy.html>

²⁵ Northern Therapy Services (2023). Services. <https://www.northerntherapy.ca/>

basis. As skills are being generalized and goals are being met, sessions may decrease in frequency.²⁶

The salaries per hour for Occupational Therapists externally contracted range from \$70 in New Brunswick to \$200 in Alberta. The average salary across Canada for In-house Occupational Therapist services is \$40.21.²⁷

4.2.2.4 Speech and Language Pathologist (SLP)

Speech-Language Pathologists are involved in preventing, identifying, and treating communication and swallowing disorders. While SLPs work directly with their clients, they also provide counselling about communication and swallowing challenges, coach family members/caregivers, and establish environmental supports.

Speech therapy has many benefits for children, including:

- Improving communication so they will be able to express thoughts and feelings;
- Enabling them to speak so that others will understand what they are saying;
- Preparing them for school so that they can keep up with other children in learning;
- Improving vocal quality; and
- Increasing self-esteem and independence.²⁸

Similarly to other specialized services, the frequency of Speech and Language therapy for children varies from case to case as it is also dependant on the issue and its complexity. According to First Nations interviewees, service providers and secondary research, best practice is for students identified as requiring SL therapy to receive a minimum of one to two hours of service per week, distributed over either 30 minutes to 1-hour sessions. It is, however, important to consider the processes to be remediated, the children's age, their attention span and tolerance for therapy. In the most complex cases, such as children with Childhood Apraxia of Speech (CAS), it has been established that intensive therapy must be as frequent as three to five days per week.²⁹

The salaries per hour for Speech and Language Pathologists externally contracted range from \$90 in Saskatchewan to \$165 in Manitoba. The average salary across Canada for In-house Speech and Language Pathologist services is \$44.00.³⁰

4.2.2.5 Psychologist

Given the mental health crisis that First Nations communities are facing, there is an increased need for mental health supports for youth to intervene and prevent further tragedy. Suicide rates among First Nations youth are three times higher than the suicide rate among non-Indigenous peoples.

To ensure that School Psychologists can perform all the functions in a timely and responsible fashion, an appropriate ratio should not exceed one School Psychologist for every 500 to 700 students. Similarly, when

²⁶ Children's Therapy Services Inc (2023). Occupational Therapy Treatment Plan. <https://www.play2learn4life.com/occupational-therapy>

²⁷ Job Bank Labour Market Information. Occupational Therapists. Available at: <https://www.jobbank.gc.ca/marketreport/wages-occupation/4168/ca>

²⁸ Seder, E. (2020). Speech Therapy for Children: What are the Benefits? <https://napacenter.org/importance-speech-therapy/>

²⁹ American Speech-Language-Hearing Association (2023). Childhood Apraxia of Speech. <https://www.asha.org/public/speech/disorders/childhood-apraxia-of-speech/>

³⁰ Job Bank Labour Market Information. Occupational Therapists. Available at: <https://www.jobbank.gc.ca/marketreport/wages-occupation/4168/ca>

School Psychologists are assigned to work primarily with student populations that have particularly intensive special needs (e.g., students with significant emotional or behavioural disorders, or students with autism spectrum disorders), this school psychologist-to-student ratio should be even lower.

Given additional on-site supports accounted for in this model (i.e., Counselors, Elders), a reasonable future state should entail having at least one full-time Psychologist per 500 students.

Professional Psychologists who work in schools in Canada typically have a Master’s or Doctoral degree focusing on school psychology. Most provinces are moving toward a Doctoral degree requirement to work in schools.

The role of a School Psychologist includes the following responsibilities:³¹

- Consult with teachers and school administrators to support them in the implementation of interventions for individual students with learning, social, emotional, and behavioural difficulties;
- Assist school staff with Tier Two prevention programmes that are delivered to students who are at-risk students for learning or mental health difficulties; and
- Provide Tier Three behavioural or psychosocial interventions for students with diagnosed disabilities or mental health disorders.

The salaries per hour for School Psychologist externally contracted range from \$120 in Prince Edward Island to \$275 in Ontario. The average salary across Canada for In-house School Psychologists services is \$43.50.^{32, 33}

4.2.3 Resources and Materials

4.2.3.1 Classroom Resources

Based on input from First Nations participants and leading practice research, creating an inclusive learning environment in each classroom requires the following resources and equipment:

TABLE 5: CLASSROOM RESOURCE DESCRIPTIONS

Resource/ Equipment	Description ³⁴
Calm down corner	A calm down corner is a designated space in the classroom with the sole intent of being a safe space for a child to go to when they feel their emotions are running too high and they need to regain their emotional and physical control. Example of items that can be in a calm-down corner are bean bag chairs, noise-cancelling headphones, meaningful signage (calm breathing poster), and sensory tools.
Sensory kit	A sensory kit is a box, bag, or bin, that contains meaningful items that each person finds specifically important and helpful—both for preventative purposes and during

³¹Canadian Psychology Association (2018). School Psychology in Canada.
<https://cpa.ca/docs/File/Sections/EDsection/School%20Psychology%20in%20Canada%20-%20Roles,%20Training,%20and%20Prospects.pdf>

³² Information obtained from the review of 65 private Phycologist services across provinces in Canada.

³³ Job Bank Labour Market Information. Psychologist. Available at: <https://www.jobbank.gc.ca/marketreport/wages-occupation/2218/ca>

³⁴ The descriptions in this table are a blend of viewpoints collected from interviews and additional research. The descriptions, however, do not represent an exhaustive definition of the components of each resource/requirement.

	times of crisis. It is a place to keep things that helps the individual regulate emotions. Examples of items in a sensory kit include Play-Doh, stress balls, pipe cleaners, craft feathers, cotton balls, etc.
Flexible seating option	The interviewees expressed the need for flexible seating options (one or two standing desks per classroom, wiggle chairs, bean bags, blocks for sitting, cushions and mats etc.). Research has shown that classroom students' seating positions contribute to learning gains. The seating arrangement will likely not improve a student's ability to resolve math problems or write grammatically correct paragraphs, however, seating positions will make a difference in a student's motivation to learn. Further, it helps students with disabilities have freedom of choice and seating options that may be more appropriate to their specific needs.
Technology	<p>The technology required in every classroom includes:</p> <ul style="list-style-type: none"> • A frequency-modulated (FM) system to keep the teacher's voice at an audible level above the background noise no matter where the child is sitting in the classroom. Systems should be in place for children coded 44/55 or any child with a sensitivity to auditory sounds and processing; • Text-to-speech (TTS) is a type of assistive technology that reads digital text aloud, sometimes called "read-aloud" technology. This technology is required among students who have difficulties with reading, especially those who struggle with decoding; and • Access to specialized software/apps.

4.2.3.2 School Resources

In addition to classroom resources identified above, both First Nations and non-First Nations participants noted a need for a designated sensory room. A sensory space in a school provides a positive school culture and climate in supporting the health and well-being of students.³⁵ The equipment in a sensory room typically includes bubble tubes, fibre optic sprays or lighting, beanbag chairs, interactive wall boards, rocking chairs, therapy balls, lighting/projector that can display various colours and patterns, weighted blankets or weighted lap pads, bins with assorted sensory activities, and an aromatherapy diffuser kit.

Some of the benefits of creating a sensory space include:

- Providing increased sensory input for students who require more stimulation to enable them to regulate their sensory and emotional needs;
- Incorporating mindfulness activities to support interceptive awareness to facilitate self-regulation and support social and emotional learning,³⁶

³⁵ National Council for Special Education (2021). Sensory Spaces in Schools. Retrieved from: <https://ncse.ie/wp-content/uploads/2021/10/NCSE-Sensory-Spaces-in-Schools-2021.pdf>

³⁶ Lynch, A. Ashcraft, R. Mahler, K. Whiting, C. Schroader & Weber (2020) Using a Public Health Model as a Foundation for Trauma-Informed Care for Occupational Therapists in School Settings, *Journal of Occupational Therapy, Schools and Early Intervention*, 13(3), 219-235 <https://doi.org/10.1080/19411243.2020.1732263>

- Promoting self-care, self-nurturance, empowerment, skill development, resilience, and recovery; and,
- A tool to be used as part of a school's trauma-informed approach to supporting students who have experienced loss, neglect, different forms of abuse, maltreatment and chronic stress.

The costs required to annually replace/renovate broken and worn-out items is between \$5,000 and \$7,000.³⁷

4.2.4 Other Expenses

4.2.4.1 Professional Development

Access to relevant Professional Development was a large gap identified by First Nations participants. The required Professional Development activities discussed included both:

- Structured training, which, on average, should include three Inclusive Education-focused Professional Development events per school year; and
- Mentoring and one-on-one training delivered by Inclusive Education Coordinators and Special Education Teachers to mitigate the risk of missing needs of students.

The cost of professional development is driven by the target audience.

TABLE 6: PROFESSIONAL DEVELOPMENT TRAINING REQUIREMENTS

Target Audience	Training Required	Annual Budget
Teachers, including Special Education Teachers, and Inclusive Education Coordinators	Teaching based on student diversity (encompasses training in various areas such as Teaching Deaf students, supporting students with behavioral challenges, Down Syndrome, Autism Spectrum Disorder, Fetal Alcohol Spectrum Disorder etc.).	\$1,500 per classroom teacher. \$2,000 per Special Education Teacher and Inclusive Education Coordinator.
Education Assistants and Counselors	<ul style="list-style-type: none"> • ECE certification; • First Nations Mental Health First Aid; • Basic behavior management training; • Physical management interventions; • Non-Violent Crisis Intervention Training ; • Professional Crisis Management; Association Training; • Safe Management Training; • Handle with Care Training; • Mandt System Training; and • Medication Administration Training. 	\$500 per Education Assistant.

In addition to topics identified above, all staff should have the following training regardless of job title:

³⁷ Cost estimated based on the interviews conducted as part of the development of this report.

- Cultural Sensitivity Training;
- Trauma and Resilience Training;
- Non-violent Crisis Intervention; and
- Foundations of Mental Health in the Classroom.

The baseline costs of hiring a facilitator and renting a training venue in an urban setting is between \$6,000 and \$15,000. The key contributors to higher cost of training in First Nations communities are:

- Economies of scale: smaller First Nations are finding it very difficult to organize in-house training; and
- Remoteness : While most First Nations participants were used to having a mix of virtual and in-person training, the overall preference is for in person and hands-on training. Accessing in-person training is particularly expensive for remote communities due to added travel and accommodation costs.

4.2.4.2 Resource and Policy Development

This cost component includes the development of foundational documents, policies, procedures, and other Inclusive Education reference documents for staff and parents.

Examples of specified areas to be included:

- Inclusive Education Toolkit: an accessible, practical resource where staff can access hands-on activities and supports to help provide a rich inclusive education learning environment;
- Crisis intervention including when/how to safely remove a student from the classroom;
- IPP procedures/schedules; and
- Schoolwide Inclusive Education policies and procedures.

4.2.4.3 Communications/ Community Engagement

Research and interview/survey participant results both strongly reflect that when parents and community members are involved in their child's education, the more likely the child is to succeed. Holding quarterly engagement sessions helps build a strong Inclusive Education environment for students, parents and the school. Example topics for engagement sessions could include:

- Inclusive School Practices;
- Getting to Know my School;
- A Snapshot of your Child's Inclusive Education Program;
- The Do's and Don'ts of Advocacy;
- Behaviour as a Form of Communication; and
- Balancing Life.

The costs associated with these engagement sessions includes catering and guest speakers.

4.2.4.4 Case Management

Case Management has been identified as a leading practice for integrated, coordinated and consistent service delivery for students with complex needs (particularly those with severe and profound codes).

Case Management entails a "circle" of people most involved in the students' education meeting together to set, discuss, and review goals and outcomes for the student. This "circle" typically includes:

- Principal;
- Teacher;
- Parent;
- Inclusive Education Coordinator;
- Two specialized service providers (e.g., Psychologist, Speech Language Pathologist, etc.); and
- Student (if appropriate).

Another goal of Case Management is to clearly identify lines of communication between school and home, and to ensure a strong support team is in place to support the needs of the student. The case management team can also provide on-call crisis intervention as needed.

A Case Management meeting typically takes place three to four times a year, and the costs involved are limited to travel expenses and refreshments.

4.2.5 Cultural Resources

The costs included in this category are attributed specifically to Inclusive Education and are not meant to cover all other language and culture programming and supports the Nations may deem necessary.

Funding for language and culture supports (i.e., language instructors, land-based programming etc.) should be included under First Nations, Metis and Inuit (FNMI) and Incremental Language and Culture components of the Interim Funding Formulas and, therefore, must be negotiated separately.

4.2.5.1 Elders and Knowledge Keepers

Based on input from participants, every school requires an Elder to serve as a healer, advisor and counselor for students. First Nations worldviews believe that all children, including those with special needs, are gifts from the Creator. This worldview is not integrated into the education of First Nations children with special needs. Due to the important role that Elders play in their communities as well as their understanding of traditional ways of knowing, Elders should be consulted in the education of First Nations students with or without special education needs. Other support services currently in place such as Student Support Liaisons or Counselors are invaluable in assisting with guidance, advocacy, and counselling. Many of these duties are part of a more Western, contemporary approach that does not address a crucial component of the holistic approach to education, which is spirituality. Elders have the experience and capability to address this neglected area.

Elders contribute to student success in the school environment through the following:

- Offering cultural guidance and support, which includes opening and closing prayers;
- Providing guidance and support to individual students;
- Participating in Case Management meetings (if needed);
- Incorporating traditional medicines, feasts and ceremonies;
- Holding a sweat at least once a week; and
- Having gatherings where they shared and gave people a chance to talk and teach.

The Elders are typically employed on a part-time basis and receive a daily honorarium ranging from \$150-\$350.

4.2.5.2 Culture/Traditional Wellness

To support student culture and traditional wellness activities, First Nations schools require a budget for activities and corresponding supplies. These activities or ceremonies vary from region to region but may include:

- Smudging and smudging kits;
- Sweats and medicine bags;
- Hand drum making and kits; and
- Traditional feasts.

4.2.6 Inclusive Education Infrastructure

Many First Nations participants were concerned about narrowly identifying operational costs, without looking at current infrastructure gaps, which would limit the ability to improve the provision of Inclusive Education services. The COVID-19 pandemic has highlighted the necessity of addressing infrastructure, technology, and supports for students with special needs to ensure they are not left behind.³⁸ Since infrastructure costs vary substantially based on age and layout of existing school building, location of First Nation, they were identified, but not quantified as part of the model.

4.2.6.1 School Space

Inadequate school space is currently a major impediment to First Nations being able to provide high quality special education services on-reserve. Recent improvements to the School Space Accommodation Standards in 2023 provide enhancements to First Nations inclusive/special education school space by guaranteeing new itinerary school spaces and using a new service-based approach to designing or renovating schools. Despite these improvements, over 400 First Nation school assets have been built and continue to be used that do not take into account the space requirements to effectively deliver inclusive education in 2023.

First Nations currently face both a lack of facilities as well as facilities in disrepair (e.g., black mold, air and water quality problems, below-standard construction, overuse of portables, etc.). Sufficient funding must be available for adequate classroom space, confidential mental health counseling, accessible bathrooms, lifts, hoists, etc.

4.2.6.2 Teacherages

Teacherages are defined by Indigenous Services Canada as living accommodation for a teacher,³⁹ with a student-teacher ratio being defined as 17:1. Even if funding is available for salaries and other operational expenses, it is often impossible to hire special education staff or bring in specialists due to a lack of housing. The housing need is particularly acute in remote and isolated communities where the housing shortage continues to impact the housing options available. In order to enable equitable provision of Inclusive Education services, First Nations which are currently eligible for teacherages under the *Level of Service Standards and Management of Teacherages on Reserve* policy:

- Must receive an additional housing unit for each certified teacher, including all inclusive Coordinator positions and all Special Education Teacher positions;
- Temporary accommodations for providers of specialized services (e.g., PT, OT, SLP, Psychology)

4.2.6.3 Accessible/Inclusive playgrounds

A critical component of a rich and robust inclusive education program is having a playground where every child can feel included and have equal opportunity for play. Play spaces based on principles of universal design and accessibility offer a variety of physical and creative play opportunities. Designed specifically to allow children of all abilities to play and enjoy activities together, accessible playgrounds are at the heart of inclusive education.

Examples of components of an accessible playground include:

- Wheelchair accessible gliders;

³⁸ AFN High Cost Special Education Program Review Final Report (2020)

³⁹ ISC (2023). Level of Service Standards and Management of Teacherages on Reserve. <https://www.sac-isc.gc.ca/eng/1100100010644/1533651868855>

- Supportive swings;
- Supportive spinners;
- Interactive play panels; and
- Accessible and safe surfacing.

It is important to include specialists (such as OT and PT) and specialized companies when planning for and adding to an accessible playground.

4.2.6.4 Accessible Infrastructure

Every school must either be fully accessible or have a school accessibility plan. This plan shows how they will improve accessibility for every student and when these improvements will be made.

Not only is an accessible school building needed in order to provide a robust inclusive education program, it can also serve the community in a capacity that other buildings cannot. Offering a space where the infrastructure meets universal needs will be an integral component of providing true inclusive education where every child, staff member, parent and community member will feel safe and welcomed.

At a minimum, every school should have:

- Accessible entrance;
- Accessible in the interior, including ramps, elevator, and lifts.
- Accessible washrooms with:
 - Change table;
 - Handicap lift; and
 - Shower room/grooming room.
- Visual fire alarms and other signage.

4.3 Assumptions

TABLE 7: DETAILED ASSUMPTIONS

Key Elements of the Cost Model	Cost Model Assumptions																		
PERMANENT STAFF SALARIES																			
Inclusive Education Coordinator	<ol style="list-style-type: none"> The number of Inclusive Education Coordinators is based on enrollment numbers and allocated as follows: <table border="1"> <thead> <tr> <th>Number of Students in School/Division</th><th>Inclusive Education Coordinator FTE</th></tr> </thead> <tbody> <tr> <td>Fewer than 150</td><td>0.5 FTE</td></tr> <tr> <td>150-300</td><td>0.75 FTE</td></tr> <tr> <td>300-500</td><td>1.0 FTE</td></tr> <tr> <td>Above 500</td><td>0.25 FTEs for each additional 150 students</td></tr> </tbody> </table> Inclusive Education Coordinator base salaries are based on maximum salary within salary grids in provincial school boards, which take into account years of service and level of education. Consistent with provincial school jurisdictions, there is an allowance of \$10,000-\$15,000 (for coordination responsibilities). To reflect the higher cost of living and shortage of labour in remote First Nations, base salaries of the Inclusive Education Coordinator are multiplied by ISC's Cost Adjustment Factor Based on Remoteness. Benefits are estimated at 20% of base salary and are not adjusted for remoteness. 	Number of Students in School/Division	Inclusive Education Coordinator FTE	Fewer than 150	0.5 FTE	150-300	0.75 FTE	300-500	1.0 FTE	Above 500	0.25 FTEs for each additional 150 students								
Number of Students in School/Division	Inclusive Education Coordinator FTE																		
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150-300	0.75 FTE																		
300-500	1.0 FTE																		
Above 500	0.25 FTEs for each additional 150 students																		
Special Education Teachers (Resource Teachers)	<ol style="list-style-type: none"> The number of Special Education Teachers is based on the number of students with special needs. <table border="1"> <thead> <tr> <th>Number of Mild/Moderate</th><th>Special Education Teacher FTE</th></tr> </thead> <tbody> <tr> <td>Fewer than 30</td><td>0.5 FTE</td></tr> <tr> <td>30-50</td><td>0.75 FTE</td></tr> <tr> <td>50-70</td><td>1.00 FTE</td></tr> <tr> <td>Above 9</td><td>0.25 for each additional 25 students</td></tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Number of Severe</th><th>Special Education Teacher FTE</th></tr> </thead> <tbody> <tr> <td>Fewer than 10</td><td>0.5 FTE</td></tr> <tr> <td>10-20</td><td>1.0 FTE</td></tr> <tr> <td>Above 20</td><td>0.5 for each additional 5 students</td></tr> </tbody> </table> <p>Special Education students are defined as those with mild/moderate or severe coding according to HCSEP Funding categories.</p> 	Number of Mild/Moderate	Special Education Teacher FTE	Fewer than 30	0.5 FTE	30-50	0.75 FTE	50-70	1.00 FTE	Above 9	0.25 for each additional 25 students	Number of Severe	Special Education Teacher FTE	Fewer than 10	0.5 FTE	10-20	1.0 FTE	Above 20	0.5 for each additional 5 students
Number of Mild/Moderate	Special Education Teacher FTE																		
Fewer than 30	0.5 FTE																		
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50-70	1.00 FTE																		
Above 9	0.25 for each additional 25 students																		
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Fewer than 10	0.5 FTE																		
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Key Elements of the Cost Model	Cost Model Assumptions								
	<ol style="list-style-type: none"> Special Education Teachers salaries are based on midpoint of salary grids in provincial school boards which take into account years of service and level of education. To reflect the higher cost of living and shortage of labour in remote First Nations, base salaries of Special Education Teachers are multiplied by the ISC Cost Adjustment Factor Based on Remoteness. Benefits are estimated at 20% of base salary and are not adjusted for remoteness. 								
Education Assistants	<ol style="list-style-type: none"> The number of EAs is calculated based on the number of special needs students: <ul style="list-style-type: none"> 1 FTE Education Assistant is hired for each student with severe to profound special needs, regardless of grade level. 1 FTE is hired for a grouping of 5 students with mild-moderate special needs in elementary grades (K-6). 1 FTE is hired for a grouping of 10 students with mild-moderate special needs in secondary grades (Gr.7 -Gr. 12). An Education Assistant's base salary is based on the median salary recorded in each province. To reflect the higher cost of living and shortage of labour in remote First Nations, base salaries of Education Assistants will be multiplied by the ISC Cost Adjustment Factor Based on Remoteness. Benefits are estimated at 20% of base salary and are not adjusted for remoteness. 								
Counselor	<ol style="list-style-type: none"> Salaries will be based on the provincial salary grid. The number of Counselors is calculated based on the number of students: <table border="1"> <thead> <tr> <th>Number of Students</th><th>FTE</th></tr> </thead> <tbody> <tr> <td>Fewer than 75</td><td>0.5 FTE</td></tr> <tr> <td>75-150</td><td>1.0 FTE</td></tr> <tr> <td>Additional increments of 75</td><td>0.5 FTE for each additional 75 students</td></tr> </tbody> </table> To reflect the higher cost of living and shortage of labour in remote First Nations, base salaries of Counselors will be multiplied by the ISC Cost Adjustment Factor Based on Remoteness. Benefits are estimated at 20% of base salary and are not adjusted for remoteness. 	Number of Students	FTE	Fewer than 75	0.5 FTE	75-150	1.0 FTE	Additional increments of 75	0.5 FTE for each additional 75 students
Number of Students	FTE								
Fewer than 75	0.5 FTE								
75-150	1.0 FTE								
Additional increments of 75	0.5 FTE for each additional 75 students								
Speech-Language Pathology Assistant	<ol style="list-style-type: none"> Every school, regardless of enrollment, will employ a Speech-Language Pathology Assistant (SLPA). Salary is based on average of quotes collected from each province. To reflect the higher cost of living and shortage of labour in remote First Nations, base salaries of Speech-Language Pathology Assistants will be multiplied by the ISC Cost Adjustment Factor Based on Remoteness. 								
SPECIALIZED SERVICES									
Assessments	<ol style="list-style-type: none"> All assessments are contracted out and conducted in-person. 								

Key Elements of the Cost Model	Cost Model Assumptions
	<ol style="list-style-type: none"> 10% of the total student enrollment require assessments (e.g., with a student population of 100, the budget would reflect funding for 10 assessments). Assessment fees are based on the average of quotes collected from assessment providers in each specific province. To cover travel expenses and travel time associated with professionals travelling to First Nations to conduct assessments, base assessment fees are multiplied by the ISC Cost Adjustment Factor Based on Remoteness.
Physiotherapy	<ol style="list-style-type: none"> All Physiotherapy services are contracted out and provided in-person. Hourly fees are based on the average of quotes collected from Physiotherapy providers in each specific province. The number of hours of service required is calculated as follows: <ul style="list-style-type: none"> 1 hour/week for 36 weeks for individual students (severe/profound); and 1 hour/week for 36 weeks for groups of 5 students (mild/moderate). To cover travel expenses and travel time associated with professionals travelling to First Nations to conduct assessments, hourly fees are multiplied by the ISC Cost Adjustment Factor Based on Remoteness.
Occupational Therapy	<ol style="list-style-type: none"> All Occupational Therapy services are contracted out and provided in-person. Hourly fees are based on the average of quotes collected from Occupational Therapy providers in each specific province. The number of hours of service required is calculated as follows: <ul style="list-style-type: none"> 1 hour/week for 36 weeks for individual students (severe/profound) 1 hour/week for 36 weeks for groups of 5 students (mild/moderate) To cover travel expenses and travel time associated with professionals travelling to First Nations to deliver services, base assessment fees are multiplied by the ISC Cost Adjustment Factor Based on Remoteness.
Speech and Language Pathology	<ol style="list-style-type: none"> All Speech and Language Pathology services are contracted out and provided in-person. Hourly fees are based on the average of quotes collected from Speech and Language Pathology providers in each specific province. The number of hours of service required is calculated as follows: <ul style="list-style-type: none"> 1 hour/week for 36 weeks for individual students (severe/profound) 1 hour/week for 36 weeks for groups of 5 students (mild/moderate) To cover travel expenses and travel time associated with professionals travelling to First Nations to deliver services, hourly fees are multiplied by the ISC Cost Adjustment Factor Based on Remoteness.
Psychology	<ol style="list-style-type: none"> All Psychology services are contracted out.

Key Elements of the Cost Model	Cost Model Assumptions
	<ol style="list-style-type: none"> Psychologist is involved in case management and one-on-one intervention for Tier 3 support when referred by the Counselor/Community Liaison Worker/Social Worker (Tier 2). One full time Psychologist is needed for every 500 students. A full-time Psychologist works 40 hours/week, 36 weeks/year (1,440 hours/year). For example, a school with enrollment of 100 students uses an average of 8 hours of service per week.⁴⁰ Hourly fees are based on the average of quotes collected from Psychologist providers in each specific province. To cover travel expenses and travel time associated with professionals travelling to First Nations to deliver services, hourly fees are multiplied by the ISC Cost Adjustment Factor Based on Remoteness.
CULTURAL NEEDS (Specific to Inclusive Education)⁴¹	
Elders and Knowledge Keepers	<ol style="list-style-type: none"> Schools usually have one Elder working on a part-time basis (4-6 hours per day, 180 days per year). The daily wage for the elder is \$250 per day (\$45,000 per year).
Cultural Ceremonies/ Traditional Wellness and Healing	<ol style="list-style-type: none"> Every school has a budget of \$25,000/year/school for supplies (medicine bags, smudge kits, hand drums, pipes etc.).
EQUIPMENT AND RESOURCES	
Classroom Equipment and Resources	<ol style="list-style-type: none"> Each classroom (defined as 17 students) has a designated quiet space. Quiet space budget is based on a rotation rationale of \$3,000/classroom annually to replace damaged or broken resources. Each classroom has a sensory/calm down kit. Sensory kit budget is based on a rotation rationale of \$600/classroom annually to replace damaged or broken resources. Each classroom will have a minimum of 3 flexible seating options, with the budget amount of \$1,000 (assuming 3-year replacement cycle). Each classroom to have an FM system with an initial purchase budget of \$2,000/classroom (replaced every three years). Each classroom to have a minimum of two C-pens (text to speech) with an annual budget of \$800. Each classroom to have a minimum of two weighted vests or lap blankets with an annual budget of \$250. Each classroom to have an annual budget of \$500 for specialized software/apps. To offset shipping to remote communities, the costs of Classroom Equipment and Resources are multiplied by the ISC Cost Adjustment Factor Based on Remoteness.

⁴⁰ Based on Recommendation of Task Force of the CPA Section on Psychologists in Education https://cpa.ca/docs/File/Sections/EDsection/School_Psychology_TFpaper_Aug2014_Final.pdf

⁴¹ All other Language and Culture related expenses, such as land-based programming, culture events, language instruction are covered through Language and Culture funding.

Key Elements of the Cost Model	Cost Model Assumptions								
School Equipment and Resources	<ol style="list-style-type: none"> Each school requires a stand-alone sensory room. Sensory room budget is based on a rotation rationale of \$6,000/school annually to replace damaged or broken resources. Each school will have at one designated outdoor classroom space to enhance both cultural practices and optional learning environments, with the annual budget of \$5,000 for equipment and resources. 								
OTHER EXPENSES									
Professional Development	<ol style="list-style-type: none"> Professional Development budget is based on: <ul style="list-style-type: none"> \$2,000 for each Special Education Teacher and Inclusive Education Coordinator; \$1,500 per classroom teacher and counselor or a minimum of \$25,000, regardless of number of teachers. Teachers include classroom teachers (1:17 students); and \$500/Education Assistant (as generated by the model), or a minimum annual budget of \$8,000 regardless of number of EAs. To account for travel costs, staff accommodation etc., expenses are multiplied by the ISC Cost Adjustment Factor Based on Remoteness. 								
Inclusive Education Documentation	<ol style="list-style-type: none"> Each school needs to develop and update relevant Inclusive Education resources and materials (Inclusive Education policies and procedures, posters, toolkits for families and staff). Each school will provide staff with an Inclusive Education toolkit. Budget for Resource Development according to size of school district: <table border="1"> <thead> <tr> <th>Size of District</th><th>Budget Amount*</th></tr> </thead> <tbody> <tr> <td>One school</td><td>\$50 000</td></tr> <tr> <td>Two-Five schools</td><td>\$75,000</td></tr> <tr> <td>Six+ schools</td><td>\$100,000</td></tr> </tbody> </table> <p>*Includes consulting and printing fees</p>	Size of District	Budget Amount*	One school	\$50 000	Two-Five schools	\$75,000	Six+ schools	\$100,000
Size of District	Budget Amount*								
One school	\$50 000								
Two-Five schools	\$75,000								
Six+ schools	\$100,000								
Community Engagement	<ol style="list-style-type: none"> Every school will have an annual budget of \$20,000 to provide quarterly Community Engagement sessions for parents and interested community members to promote inclusive education awareness and understanding. Annual budget includes catering, media and a guest speaker brought in for one of the quarterly meetings. 								
Case Management	<ol style="list-style-type: none"> Case Management Team is established for every student with a severe/profound code. Case Management meetings will be held three times/school year. Costs to reflect travel expenses and refreshments. Costs reflect six individuals involved in each Case Management meeting. \$200/meeting x 3 meetings/year = \$600 annually. 								

Key Elements of the Cost Model	Cost Model Assumptions
INCLUSIVE EDUCATION INFRASTRUCTURE (qualitative outputs only) ⁴²	
School Space	1. There is sufficient space to accommodate staffing and resources identified above (incl. sufficient classroom and storage space).
Teacherages	<ol style="list-style-type: none"> Each additional certified teacher hired from outside of the community needs to be housed within the community. Number of additional certified teachers includes Inclusive Education Program Coordinator and Special Education Teachers. Percentage of teachers from outside of the community is based on historical trends (input by First Nation).
Accessible Playgrounds	1. Every school has an accessible playground.
Accessible Infrastructure	<ol style="list-style-type: none"> Every school has an accessible entrance. Every school is accessible in the interior. <ul style="list-style-type: none"> Ramps; Elevator; and Lifts. Every school has accessible washrooms with: <ul style="list-style-type: none"> Change table; Handicap lift; and Shower room/grooming room. Every school has visual fire alarms.

⁴² The model will help First Nations identify capital needs to be discussed with ISC Community Infrastructure Branch. No costs will be assigned to capital needs as part of the model.

4.4 Sample Calculations

The Inclusive Education cost model was applied to three First Nations education organizations below. Since the number of students with special needs has the highest impact on costs generated through the model, for comparison purposes it was assumed that the incidence rate of special education students for all three organizations is the same:

- Students with mild and moderate special needs comprise 20% of total enrolment;
- Students with severe and profound special needs comprise 5% of the total enrolment.

TABLE 6: SAMPLE INPUTS AND RESULTS GENERATED BY THE MODEL

First Nation	Small Fly-in First Nation in Ontario	Large Remote First Nation Education Authority in Alberta	Mid-sized First Nation close to a major urban center in Alberta
INPUTS			
Cost Adjustment Factor Based on Remoteness	126.1%	40.3%	7.6%
Number of Students in Kindergarten to Grade 6	130	640	231
Number of Students in Grade 7 to Grade 12	26	598	192
Number of Students with Mild/Moderate Special Needs	31	248	85
Number of Students with Severe/Profound Special Needs	8	62	21
Number of Schools	2	5	3
SUMMARY RESULTS			
Cost Category	Annual Amount Per Student (\$)	Annual Amount Per Student (\$)	Annual Amount Per Student (\$)
Permanent Staff Salaries	\$13,988	\$6,646	\$5,418
Inclusive Education Program Coordination	\$1,304	\$291	\$347
Special Education Teachers	\$1,465	\$834	\$506
Education Assistants	\$8,096	\$4,417	\$3,483
Counselors	\$1,185	\$676	\$498
Assistant SLP	\$1,939	\$428	\$584
Specialist Services (Contracted)	\$4,975	\$3,028	\$2,306
Assessments	\$588	\$370	\$281

First Nation	Small Fly-in First Nation in Ontario	Large Remote First Nation Education Authority in Alberta	Mid-sized First Nation close to a major urban center in Alberta
Physiotherapy	\$913	\$515	\$391
Occupational Therapy	\$1,023	\$732	\$557
Speech-Language Pathology	\$986	\$652	\$496
Psychology	\$1,465	\$759	\$581
Equipment and Resources	\$943	\$554	\$469
Classroom Resources	\$802	\$510	\$391
School Resources	\$141	\$44	\$78
Cultural Needs Costs	\$897	\$283	\$496
Elders and Knowledge Keepers	\$577	\$182	\$319
Cultural Ceremonies/Traditional Wellness and Healing	\$321	\$101	\$177
Other Expenses	\$1,343	\$401	\$517
Professional Development	\$536	\$217	\$165
Inclusive Education Documentation	\$481	\$61	\$177
Community Engagement	\$256	\$81	\$142
Case Management	\$70	\$42	\$32
Model Generated Costs Per Student	\$22,148	\$10,911	\$9,206
Model Generated Costs for School	\$3,455,025	\$13,508,151	\$3,894,172
Current Funding Per Student*	\$4,675	\$2,938	\$3,445
Current Funding for School*	\$729,295	\$3,637,538	\$1,457,345

*The current funding figures for inclusive education costs include funding from the interim funding formula, which does not represent all inclusive education funding sources. Students may still access proposal-based programs such as the High-Cost Special Education Program (HCSEP) and Jordan's Principle.

5.0 Conclusions

The Inclusive Education Cost Model estimates the required special education staff, resources, and services for each school and multiplies those staff positions and services by real-life cost figures collected from First Nations and non-First Nations school jurisdictions, service providers, and subject matter experts. It can be utilized by First Nations as a tool to support their funding negotiations as part of the Regional Education Agreement (REA) process.

Based on sample calculations derived from the model, the funding ranges from \$9,206 per FTE for a First Nation close to a major urban center to \$22,148 per FTE for a small fly-in community.

Additional Considerations

Presented below are some additional considerations that need to be taken into account in order to improve the funding and delivery of Inclusive Education.

- **Additional proposal-based funding.** The Inclusive Education cost model does not fully eliminate the need for proposal-driven funding, such as Jordan's Principle. The proposal-driven funding should be made available to cover extra expenses associated with unique needs of students, not covered through the model, including expensive assistive devices and technology, additional specialist support, medical supplies etc.
- **Ongoing updates.** The costs reflect a point in time, so there is a need for ongoing updates of assumptions and costs incorporated in the model.
- **Incorporating students awaiting assessments.** Since the number of special education students is often underreported, particularly in small remote First Nations, it is important to ensure that in their advocacy efforts, First Nations identify not only the "coded" (assessed) students, but also those awaiting assessments.
- **Capital infrastructure.** Substantive equality in the area of Inclusive Education cannot be achieved without investing in infrastructure. Specifically, additional designated capital funding is required to address accessibility issues, space limitations, and housing for Inclusive Education staff and visiting specialists who reside outside of the community.
- **Funding for First Nations without schools.** Additional primary research is required to determine the level of special education services at provincial school jurisdictions:
 - To what extent services provided by provincial school boards address the needs of First Nations students; and
 - What the incremental costs of supplementing these existing services are.



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