

A review of current government approved system authorities' arrangements for funding of students with disability and common reform directions

Project 3: Report prepared for the National School Resourcing Board sub-committee for the students with disability loading review

Mark Tainsh
December 2019

Table of Contents

Executive summary	2
Introduction	6
Methodology.....	6
Shared reform directions and key principles for supporting students with disability in schools	7
Overview of System approaches to funding and impact of NCCD	9
State and territory government System funding arrangements for students with disability.....	11
Funding relativities between System targeted disability funding and the NCCD levels of adjustment	12
Discussion.....	12
Appendix 1	14
References	15

Executive summary

Shared reform directions and key principles for supporting students with disability in schools

While there are significant differences across and within approved system authorities (Systems) in the way students with disability are supported in Australian schools, representing the impact of their separate socio-political contexts and evolving policy, values and beliefs about disability and pedagogy, it is possible to identify common reform directions..

There is a shared direction and commitment across all Systems to deliver an excellent education to every child and young person with a disability, on the same basis as their peers, through schooling systems that have inclusion at the heart of their culture, curriculum, pedagogy and practices. This is evidenced over the last ten years by Commonwealth, state and territory government reviews, reports and policy development related to students with disability in schools. Taken together, they set out a broad approach to strengthening inclusion and maximising participation and achievement for all students.

This shared commitment and policy direction has been strengthened by the requirements set out in the Disability Standards for Education (DSE) and the introduction of the Nationally Consistent Collection of Data on School Students with Disability (NCCD). Ongoing implementation of the NCCD and development of associated guidance materials is likely to continue to play a part in shaping future reform directions and funding approaches across all jurisdictions and sectors.

Differences in System funding arrangements and impact on this project

There is a considerable difference between government, Catholic and independent System approaches to school funding for students with disability. While each System uses a combination of Commonwealth and System funding to support the full cohort of students with disability captured in the NCCD, the mechanisms used to fund schools for this cohort vary considerably.

The aims of this project required the use of comparable System data. Targeted funding programs were identified as the best source of comparable data as they provide funding to schools based on a targeted cohort and a number of specific students, whose eligibility is recorded in a centralised database. Although all Systems fund schools to make adjustments for students with disability, this type of comparable program data is not available within the broader needs-based school funding approaches used by the Catholic and independent Schools Systems. For this reason, this project focused on government Systems only.

State and territory government System funding arrangements for students with disability

Government Systems use two main programmatic approaches to distribute funding for students with disability to schools.

A *targeted funding program* for a known set of students with moderate to high needs, using specific disability criteria and evidentiary requirements. This cohort will not reflect all students with disability who receive support and who are captured in the NCCD.

An *equity-based program* that allocates funding to schools for students with disability identified with lower levels of need. This is derived using an equity formula (which may include consideration of variables including enrolment, attendance and achievement). Schools use the allocated funding to support those students with disability who require reasonable adjustments—most of whom will not meet the moderate to severe criteria for the targeted funding program of their System. These

students will be captured in the NCCD but not necessarily on System databases of students with disability who attract targeted disability funding to their school.

While each government System has a range of programs, services and funding arrangements to address the needs of all students with disability, their targeted funding programs provide specific resourcing to support schools to make the reasonable adjustments required for students with a specific form of disability and moderate to high needs.

Impact of the National Disability Insurance Scheme (NDIS)

The impact of the NDIS on System funding for students with disability and high needs is yet to be fully determined as negotiations on scope, timing and responsibilities continue. The provision of personal care in schools and student transport are a focus of current negotiations. This is an area that will benefit from further consideration at a later time.

Funding relativities between System targeted programs and NCCD levels of adjustment

2018 System data on targeted funding programs was cross matched with 2018 NCCD data to provide an overview of the relationship between System program allocations and NCCD adjustment levels. The analysis includes data from seven state and territory government Systems:

- Four Systems provided data on their targeted program expenditure by level and the number of students supported by those programs (by NCCD level)
- One System provided information on targeted program FTE allocations to support students with disability, as well as the number of students supported (by NCCD level). The FTE information was converted into dollar figures for the purposes of this project
- One System provided high-level information on targeted program expenditure but was not able to provide the numbers of students supported by NCCD level
- Publicly available information on targeted program expenditure was sourced for a seventh System. Information on the numbers of students supported (by NCCD level) was not available.

While comparisons need to be made with caution, the data provides high-level information about funding relativities across the three NCCD levels of adjustment, which may be useful for considering the settings for the Commonwealth students with disability loading.

Data from five of the state and territory Systems is presented in the tables below to show:

- Average per student targeted program expenditure aligned to NCCD levels of adjustment
- Average per student targeted program expenditure aligned to system distribution
- Average per student targeted program expenditure aligned to NCCD levels of adjustment (expressed as relativities) and average per-student targeted program expenditure aligned to system distribution (expressed as relativities)
- Proportion of the NCCD population funded under targeted programs.

Table 1: Average per student targeted program expenditure aligned to NCCD levels of adjustment

NCCD level of adjustment	Aggregated average per-student funding at each funded level of adjustment (weighted)
Supplementary	\$10,374
Substantial	\$15,256
Extensive	\$23,803

Note: Based on data from the five systems that provided information on the numbers of students supported by targeted programs, by NCCD level

Table 2: Average per student targeted program expenditure aligned to system distribution

Targeted program low, mid and high funding points	Aggregated average per-student funding at the low, mid and high funding points
Low	\$4,682
Mid	\$17,821
High	\$38,258

Note: Based on data from the six systems that provided information as well as publicly available information.

Table 3: Average per student targeted program expenditure aligned to NCCD levels of adjustment (expressed as relativities)

NCCD Level of adjustment	Aggregated average per-student expenditure (aligned to the three funded levels of adjustment—weighted)
Supplementary	1.0
Substantial	1.5
Extensive	2.3

Note: Based on data from the five systems that provided information on the numbers of students supported by targeted programs, by NCCD level

Table 4: Average per-student targeted program expenditure aligned to system distribution (expressed as relativities)

Targeted program low, mid and high funding points	Aggregated average per-student expenditure (aligned to system distribution)
Low	1.0
Mid	3.8
High	8.2

Note: Based on data from the six systems that provided information as well as publicly available information.

Table 5: Proportion of NCCD population funded under targeted programs (aggregated)

NCCD level	Proportion of NCCD population funded under targeted programs	Range
QDTP	5%	0.5% to 14%
Supplementary	10%	2% to 14%
Substantial	36%	14% to 71%
Extensive	54%	12% to 90%

Note: Based on data from the five Systems that provided information on the numbers of students supported by targeted programs, by NCCD level. Note: the lower end of these ranges is affected disproportionately by data from one System, as its targeted program is not the source of funding and support for the majority of its students with higher needs

Discussion

Taken at a jurisdictional level, there is fairly common agreement on the disability categories covered in each jurisdiction's targeted funding programs (see Appendix 1). There are, however, significant differences in eligibility requirements across jurisdictions, resulting in differing percentages of the total government enrolment cohorts covered by disability targeted programs; noting that schools are also provided with funding and resources outside targeted programs to ensure all students in the NCCD are supported with necessary adjustments. This difference presents challenges when comparing jurisdictions.

The amount of funding the sample state and territory Systems provide at each level under their targeted funding programs increases as the needs of the students becomes higher and more complex. This is reflected in the higher amounts allocated by every jurisdiction for their highest level of support and reflected in the data tables showing relativities between targeted program funding levels. While the student numbers reduce at the higher levels of adjustment for disability, the cost of meeting these students' needs increases significantly.

The aggregated figures in this report are intended to provide a broad set of information to support the Board's consideration of the settings for the students with disability loading. While it is not necessary for the loading to reflect the figures presented in report, this project's findings provide an indication of current practices of jurisdictions, and the funding relativities they deem appropriate to the level and nature of need in each cohort.

Along with the results of the other validation projects, the aggregated data presented in this report may be used to inform consideration of the settings for the students with disability loading, noting that implications for funding reform should be approached cautiously given the research challenges and methodological difficulties discussed.

Introduction

This project responds to the Board's Terms of Reference scope which asks it to examine 'the level of funding for educational adjustment provided by approved system authorities to member schools for students with disability under each system's needs-based funding arrangements'.

The project has two key objectives:

- to identify current state and territory government System arrangements for funding students with disability and moderate to high needs, and common reform directions that may inform future Commonwealth students with disability funding loadings.
- to establish the relativity between aggregated System targeted funding amounts (per student) and the three Nationally Consistent Collection of Data on School Students with Disability (NCCD) adjustment levels, to inform the validity of the current loading settings, using a sample collection of state and territory data.

Methodology

The project undertook a number of steps to enable the collection of the necessary data, its analysis and final paper. A project plan was established and a national mapping framework was developed to enable the collection and comparison of 2018 data across state and territories. The mapping framework was used to consider the similarities and differences between Government and non-government Systems broad policy and reform directions, and funding allocative mechanisms and arrangements. Project 3 methodology included:

- Identifying gaps in available information through desktop research and consultation processes.
- Information requested and received from all state and sector approved systems authority about their needs-based funding arrangements for schools.
- A request to each state and territory government System for information and data on the alignment of their students with disability targeted funding program allocations with the three funded NCCD levels of support.
- Use of government sector data only. While government, Catholic and independent school Systems share a broad set of reform directions and principles for supporting students with disability, the funding mechanisms used by Catholic and independent Systems do not enable a like-for-like comparison for the purpose of this project. The number and proportion of students with disability in government System schools enabled a valid research sample to inform and achieve the intention of Project 3. Efforts were made to ensure that the sample included both state and territory data from jurisdictions of varying sizes and numbers of students with disability.
- Analysis of the data by Professor Matthew Gray, Director, ANU Centre for Social Research and Methods, Australian National University, to establish the relativity between aggregated per-student System disability targeted program funding amounts for each of the three NCCD adjustment levels. Sample jurisdictions' figures were aggregated in tables which show the overall relativity between the three levels.
- Analysis considered by the National School Resourcing Board Sub Committee and Expert Panel to identify the extent to which the data based on a nationally aggregated sample of state and territory arrangements could be used to validate the settings of the loading and inform the National School Resourcing Board' analysis.

This approach encountered significant methodological difficulties and there are a number of caveats in relation to the project data and its use. It is noted that there are significant differences between individual jurisdictions' level of support and the sample size was limited to six jurisdictions (with complete data provided by only four).

As well, because this project used data obtained from disability targeted funding programs, the expenditure amounts do not reflect the full Commonwealth and State contribution to funding for students with disability. Each jurisdiction makes decisions about how much is funded under their targeted program and what other formula based funding, services, equipment, training, allied health support and specialist programs for students with disability are provided for schools to assist them to make the necessary adjustments for participation and achievement on the same basis for all students with disability. This raises the strong likelihood that the funding attributed to students in targeted programs is under represented in the collected data.

Shared reform directions and key principles for supporting students with disability in schools

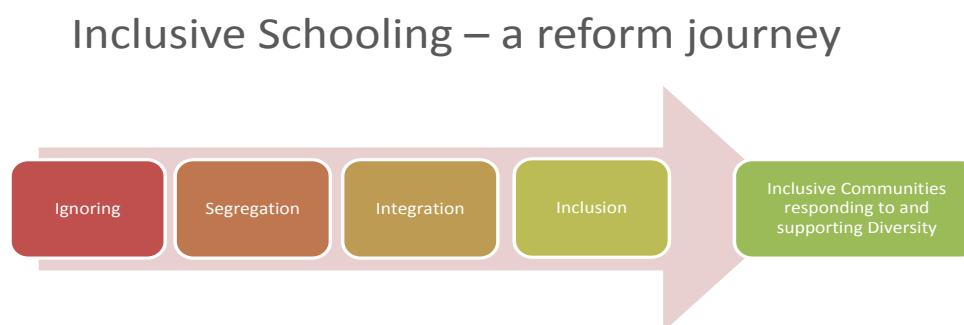
There are approximately 9,500 government and non-government schools providing educational programs for an enrolment of over 3.89 million students. Within this total enrolment, the recently introduced NCCD identified that 18.8 per cent of all enrolled students have a disability requiring some form of adjustment in 2018. While there are significant differences across and within the approved systems authorities, representing their separate historical and political contexts, and the impact of evolving policy, values and beliefs related to disability and pedagogy, it is possible to identify a common reform direction, with some key principles and shared approaches to disability funding.

The last 30 years has been a period of reform and change to the way our Australian society and schools view, respond to and support their students with disability and communities and the role they have in contributing to the nation's broader economic and social development.

Schools have undergone a significant shift away from the industrial model of schooling with little regard to individual circumstances, including the impact of socio economic, physiological and cultural differences upon a student's ability to participate.

In the last three decades we have seen schools move from a focus on ensuring a "known and small group of students with severe disability", including students with mild to profound intellectual disability, students who were legally blind, deaf, or had severe physical or cognitive disability with high level attendant care needs, could access buildings and playgrounds, to the current expectation of participation and achievement for all children and young people with disability on the same basis as their peers. Over the last ten years specifically, we have seen the language and intent of our education systems demonstrate a commitment to building inclusive school cultures that accept and reflect the diversity of our nation.

Figure 1: Inclusive schooling—a reform journey



There has been a growing expectation at the national and state level that every child with a disability will be supported to maximise their educational, vocational and wellbeing outcomes, and that schools will meet the challenges and opportunities created by our increasingly diverse and complex school population, through a focus on personalised learning and support for all students. Supporting this cultural change has been the growth of more equitable funding approaches that take account of the cohorts that exist within school populations and which may experience educational disadvantage including students with disability, and a steady and considerable increase in funding from the Commonwealth and State governments for all schools to support students with disability.

These societal and schooling changes have been a response to, and are reflected in, a number of national and state government reforms, including the introduction of the *Disability Discrimination Act 1992* (DDA) and the Disability Standards for Education 2005 DSE. Aligned with these changes there has been an increasing focus by the Education Ministerial Council and heads of Systems on students with disability and building the capacity of our schools to deliver an excellent education to every student.

In recent years the Ministerial Council and System heads' reform agenda has reflected a set of nationally agreed reforms that are changing the culture of our education systems and the way we think about and respond to people with disability. These reforms are helping to deliver high quality learning and support outcomes for all children and young people with disability.

While individual approaches are varied, there are key principles evident in most System policy and initiatives:

- that all students with disability are children and young people first and their areas of difference are part of a broader tapestry of diversity that enriches as well as challenges our schools
- a focus on the individual child and their learning and support needs
- the need to build our systemic capacity through developing the knowledge, ability and skills of our workforce
- effective pedagogy for students with disability and inclusive schooling systems benefit all students
- the understanding that students with disability are not limited to government schools and all sectors share a commitment to ensure they receive the support they need

- that schools and their communities are best placed to make decisions, in consultation with parents and students, about the aspirations and needs of their children and young people with disability
- that while schools require the freedom and flexibility to innovate and deliver targeted solutions they also require access to high quality guidance, information, resources, training and advice
- our understanding and approaches to support and funding for all students with disability need to be aligned with the DDA and the DSE and reflect the wide variety of needs and strengths that exist in the cohort covered by this legislation.

In keeping with these principles, the Commonwealth, states and territories have worked to deliver a number of reforms. These include a number of national projects that reflect these themes and directly align with National Disability Strategy (NDS) policy directions, in particular:

- the introduction of the NCCD
- development of professional learning resources on the DSE and disability on the NCCD portal, for school leaders, teachers, education assistants, early childhood educators and school communities
- development of a national curriculum framework which encompasses the needs of students with disability
- identifying priority actions arising from 2015 Review of the DSE
- development and the publication of *Planning for Personalised Learning and Support: A National Resource Based on the Disability Standards for Education 2005*.

There is a common direction and commitment across all Systems, to ensure schools are supported to deliver an excellent education to every child and young person with a disability, on the same basis as their peers, through schooling systems that have inclusion at the heart of their culture, curriculum, pedagogy and practices. This is evidenced over the last ten years by Commonwealth, state and territory government reviews, reports and policy development, related to students with disability in schools (see references). Taken together they set out a broad approach to strengthening inclusion and maximising participation and achievement for all students. This shared commitment and policy direction have been strengthened by the introduction of the NCCD and the requirements set out in the DSE. The ongoing implementation of the NCCD and development of its associated materials is likely to continue to play a part in shaping future reform directions and funding approaches across all jurisdictions and sectors.

Overview of System approaches to funding and impact of NCCD

An early finding of the work was that there is a considerable difference between Government, Catholic and Independent System approaches to funding for students with disability. While each System approach involves the use of Commonwealth and System funding to support the full cohort of students with disability captured in the NCCD, the allocative mechanisms vary considerably across the Systems.

The aims of this project required data on funding allocations to schools based on a targeted cohort, a number of specific students and collected in a central data base. Although all Systems provide funding to support schools to make the necessary adjustments for students with disability, data based on a targeted systemic program for students with disability was not available within the broader approaches used by the Catholic Systems. The focus was also on larger systems (i.e. not independents).

The sample of state and territory government Systems used in this project offers a research and operational quantum, of student numbers and funding amounts to contribute to the broader review

of the SRS loading for students with disability. A decision was made to proceed with project 3, using the 2018 data from a representative sample of state and territory Systems.

The key principles set out above and the broad shared commitment to inclusive schooling are reflected in the intention of the funding approaches of all Systems. Accompanying the stronger focus on inclusive schooling has been a sustained and considerable increase in the amount of funding that is provided to support students with disability in System schools. This growth in funding reflects a number of drivers, including:

- steady national growth in school enrolment numbers
- increasing identification of students with disability through improved assessment and diagnostic processes
- the incremental rise in the diagnosis of students with Autism Spectrum Disorder
- a broadening of the students considered to have a disability and in need of support as covered by the DDA and the DSE (e.g. Dyslexia, Attention Deficit Hyperactivity Disorder and other learning disorders)
- the indexation of funding in targeted programs
- increased Commonwealth and state and territory funding.

These drivers have had different impacts across System schools. How Systems have gone about meeting this growing funding challenge has differed but all Systems have been required to put in place arrangements to meet their responsibilities under the *DDA* and the *DSE*, provide support to their schools and address the increase in numbers and cost. Prior to the introduction of a new funding model in 2018 by the Commonwealth, which uses the NCCD to determine System funding allocations for students with disability, each System was required to submit data on the number of students who met the eligibility criteria as having been assessed by a person with relevant qualifications as having intellectual, sensory, physical, social/emotional or multiple impairments; and satisfied the criteria for financial assistance for their state's special education services or funding programs. This data determined funding amounts with the intention that this money would be used by the System to provide schools with the necessary funding to support those students with disability captured in the reported data set. This data was published in the Productivity Commission's annual Report on Government Services (RoGS) and reflected significant inconsistencies across states and territories in the percentage of students with disability within the total school enrolment population.

The introduction of the NCCD to determine the Australian Government allocation for students with disability has resulted in the use of a common set of criteria across all Systems to collect the data. Across jurisdictions and Systems, significant variances still exist in the percentages of students identified in the three levels of adjustment, and in the NCCD overall. The use of the NCCD by the Commonwealth, and its application to all Australian schools, has impacted upon each System and their approach to school disability funding. For example, in 2019, South Australia introduced a new funding model for students with disability, using the NCCD to establish eligibility and the funding level allocated to a school. Tasmania has also announced that from 2020 it will introduce a new funding model for students with disability that focusses on the need for adjustment and uses the NCCD levels of support as a central part of the process.

State and territory government System funding arrangements for students with disability

Using state and Commonwealth funding, all state and territory government Systems provide resources to support schools to meet the needs of all students with disability requiring adjustments. There are two main programmatic approaches to the distribution of this funding to schools.

A *targeted funding program* for a known set of students with moderate to high needs, using specific disability criteria and evidentiary requirements. This cohort will not reflect all students with disability who receive support and who are captured in the NCCD. The exception is South Australia which moved in 2019 to a new model using the NCCD as the eligibility criteria for targeted funding. (see Appendix 1: Government System targeted funding program categories—Overview).

An *equity-based program* that allocates funding to schools for students with disability and identified lower levels of need. This is derived using an equity formula (which may include consideration of variables including enrolment, attendance and achievement). Schools use the allocated funding to support those students with disability who require reasonable adjustments—the greater number of whom do not meet the moderate to severe criteria for the targeted funding program of their System. Examples may include mild speech delay, attention deficit disorder or learning difficulties. These students will be captured in the NCCD but not necessarily on System databases of students with disability who attract targeted disability funding to their school.

While these two funding approaches are identified as the major avenues of direct school funding, they are part of a wider set of resources, programs, supports, expertise and funding that Systems provide to support their schools and students with disability. What is available varies across Systems and individual schools, reflecting their separate resourcing arrangements population characteristics, geography and organisational structures. Examples of these provisions may include allied health officers, consultants and visiting teachers, specialist settings and programs for specific disability, teacher scholarships and professional learning, specialist equipment grants and programs, and facilities modification and adjustment programs for schools.

This means the total resourcing available to schools to support all students with disability (as identified in the NCCD) is more than the funding provided through the Systems' targeted disability funding programs alone. This project, while acknowledging the greater total spend, and the difficulties this raises for the comparative research and validity of the data, has a narrow focus on the System targeted programs for students with moderate to high needs. The analysis of targeted program funding is not intended to establish cost benchmarks or to indicate the full amount of funding needed by Systems. Nor is it designed to enable comparisons of allocations across jurisdictions. However, as these targeted programs represent the greater proportion of spending by Systems and support those students with higher levels of need, they can inform a consideration of the current settings for the Commonwealth disability with disability loadings. The information in this project report is part of the wider review of the funding provided through loadings that schools need to support all students with disability.

There are challenges in establishing total spends, including costing the contribution a systemic service or program makes to supporting students with disability (e.g. allied health officers or educational consultants and officers with specific expertise—e.g. teaching Braille or Auslan or the production of curriculum resources in Braille—who support a broad range of students experiencing challenges with their schooling). The key characteristic of targeted programs is their delivery of funding directly to the school and the attribution of a funding loading to meet an individual student's

need for adjustments. The funding allocation may take the form of a salary entitlement in some System programs (a fractional EFT apportioning of teacher/teacher aide time) but this can be calculated as an amount of allocated funding.

Once eligibility for the targeted funding program is established, each student is profiled for their level of need/requirement for support and adjustments. The outcome of this process, which varies considerable across Systems, is an attributed funding amount (level) which is then allocated to the school's budget.

Funding relativities between System targeted disability funding and the NCCD levels of adjustment

The NCCD is a broader data set than the targeted programs in each System. The NCCD aims to capture all students with disability in Australian schools who require adjustments to be able to access education. This includes those students whose needs are intermittent, requiring one off or low levels of adjustment, the use of a plan for a possible medical/health emergency or through quality differentiated teaching practice.

While each System will have a range of programs, services and funding arrangements to cover to address the needs of all students with disability, the targeted funding programs used by the Systems provide resourcing to support schools to make the reasonable adjustments for students with a specific form of disability and moderate to high needs. The cohort size varies across individual state and territory government Systems¹, reflecting the broader disability support funding and provisions approach of each system and the targeted disability program cohorts are a subset captured within the NCCD data.

Data from five state and territory government System data on disability targeted program student numbers, with their attributed levels of support and funding, were analysed to provide a high-level overview of the similarities between System approaches and funding under the loading for students with disability. As one jurisdiction provided FTE allocations, costs for that jurisdiction were extrapolated from the FTE data.

The analysis looked at average per-student funding. The vast majority of students funded within a System's targeted disability funding program will be captured in the broader NCCD data. Identifying the NCCD level of adjustment attributed to these students has enabled comparisons between the relative levels of need of this significant cohort and funding attracted by this cohort under the current Commonwealth student with disability loading.

Comparisons need to be made with caution. It is not intended that the Commonwealth loading levels reflect the aggregated outcomes presented in the project data. The data does, however, provides useful high-level information for considering the current loading settings.

Discussion

Taken at a jurisdictional level, there is a fairly common set of disability categories covered in each jurisdiction's disability targeted funding program (see Appendix 1). There are, however, significant differences across jurisdictions in eligibility requirements, resulting in differing percentages of the total government enrolment cohort covered by the targeted programs²—noting that schools are provided with additional funding and human resourcing additional to the targeted program

¹ Report on Government Services 2018 – Schools - Table 4A.7 Funded students with disability

² Report on Government Services 2018 – Schools - Table 4A.7 Funded students with disability

allocation, to ensure that all students in the NCCD are supported with the necessary adjustments. Table 5 shows the proportion of the NCCD population funded under targeted programs.

This difference presents methodical difficulties and challenges when looking across jurisdictions. While this project has a focus on the total of all students in the targeted funding programs and the aggregated funding amounts across the three NCCD levels, the varying weightings each jurisdiction has attributed to each of their targeted program levels, and considerable variance in the enrolment numbers for each jurisdiction, may skew the data.

Therefore, the use of the aggregated data is intended to provide a broad set of information that can inform early stage considerations about reforms to existing national loadings. It is not necessary or intended that the Commonwealth student with disability loading across the three NCCD levels reflect the same aggregated funding levels presented in the project data. Rather, this project considers current jurisdictional practices and the responsiveness they deem appropriate to the level of need and the nature of that need in each cohort.

The amount of funding that jurisdictions provide at each level under their disability targeted funding programs increases as a student's needs become higher and more complex. Given the description in the NCCD levels of support guidelines for schools, and the case studies that are provided on the NCCD website, students in the Extensive level are likely to have significant functional challenges to their participation on the same basis as other students. They may require extensive one to one support across a number of functional domains, including social/emotional, mobility, toileting, gastro feeding or intensive pedagogical approaches to maximise their learning. This may affect an adjustment's frequency, duration, the administrative complexity, or the need for expertise of supporting staff. This is reflected in the higher funding allocated and the intensive nature of the adjustments provided at the Extensive level.

The use of targeted funding data may exclude the funding provided to the higher needs students through supports such as medical care, expertise, training, specialist equipment and one to one supervision. This may lead to some distortion in the funding relativities across the tables.

At the jurisdictional level, the data tables do not show a strong consistency or pattern in the funding relativities across the three NCCD levels, but the table for funding at each NCCD level of adjustment by weighted and non-weighted, average student amounts shows that the greatest increase in funding occurs between the Substantial and Extensive levels. This is reflected in the Table 2 aggregated average funding relativities.

The data also shows that aggregated state and territory distribution relativities are fairly close to the current SRS students with disability loading relativities. This contrasts with the relativities that emerge when funding is aligned to NCCD categories—these appear much flatter due to higher funding at the Supplementary level. It should be noted that Supplementary students included in targeted programs are more likely to be at the higher end of the range of costs.

While this higher funding may reflect a more accurate estimation of these students' needs, all jurisdictions also have other programs and funding mechanisms in place to support these students. Given the larger number of students identified in the Supplementary category, it is worth considering whether the larger number of Supplementary level students with disability in schools allows for greater efficiencies in adjustment delivery and costs, as opposed to the smaller number of students with disability and intensive personalised high needs, identified within the Extensive level of adjustment.

Appendix 1

Comparison of disability categories used by each state and territory government System in their targeted disability funding programs

	Intellectual disability	Hearing impairment Hard of hearing/ Deaf Sensory	Vision Impairment Blind Sensory	Physical disability/ impairment	Severe behaviour disorder	Autism Spectrum Disorder/ Autism	Speech and language impairment Severe language disorder	Deaf and blind	Mental health problems/ Severe mental disorder/ Psychiatric disability	Global developmental delay	Chronic/ Severe medical health condition	Multiple disabilities
NSW	Yes	Yes	Yes	Yes		Yes	Yes	Yes	Yes			
VIC	Yes	Yes	Yes		Yes	Yes	Yes					
QLD	Yes	Yes	Yes	Yes		Yes	Yes					
WA	Yes	Yes	Yes	Yes		Yes			Yes	Yes	Yes	
SA*												
TAS	Yes	Yes	Yes	Yes		Yes			Yes			Yes
NT*												
ACT	Yes	Yes	Yes	Yes		Yes	Yes		Yes		Yes	

Note: South Australia uses the NCCD eligibility criteria. This does not include the categorisations in the table above. No publicly available information on the categories used by the Northern Territory was located.

References

Scoping Study: Assessing the Costs of Schooling for Students with Disabilities in Australia, Report to MCEETYA Schools Resourcing Taskforce, Allan Consulting Group, February 2006.

Disability, Diversity and Tides that Lift All Boats: Review of Special Education in the ACT, Canberra, 30 October 2009.

Report on the Review of Disability Standards for Education 2005, Department of Education, Employment and Workplace Relations, June 2012.

Improved Support for Students with Disability Ministerial Taskforce Report, Tasmania, August 2015.

Access to real learning: the impact of policy, funding and culture on students with disability, Education and Employment Reference Committee, January 2016.

Review of the Program for Students with disabilities, Victorian Department of Education and Training, April 2016.

Inclusive education for all Students with Disabilities and Additional Needs, the Government's response to the review of the program for students with disabilities, Victorian Department of Education and Training, April 2016.

Education of students with a disability or special needs in New South Wales, NSW Legislative Council, Portfolio Committee 3—Education Inquiry, September 2017.

NSW Legislative Council Inquiry into students with disability or special needs in New South Wales schools—CECNSW Submission, February 2017.

Review of education for students with disability in Queensland state schools, Deloitte Access Economics—Department of Education and Training, February 2017.

Report of the Select Committee on access to the South Australian education system for students with a disability, Legislative Select Committee, May 2017.

National Disability Strategy 2010–2020, Australian Government Action Plan, November 2017.

Review of Policy and Practice for Students with Additional Needs—Final Report, Victoria University, August 2018.