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Dear Minister Strahl:

On behalf of the BC First Nations Education Steering Committee (FNESC), I am writing in regard to the recently released Audit of the Post-Secondary Education Program, dated January 23, 2009. That audit highlights a number of critical issues to which FNESC would like to respond.

To begin, I would like to point out that FNESC has been attempting to engage INAC through the Assembly of First Nations (AFN) Chiefs Committee on Education on improvements in all areas of life long learning. These attempts have included meetings, correspondence, and efforts to be included in the education authorities renewal. Many issues raised in this audit also have been raised in those efforts, but to no avail.

The Auditor General's report in 2005 called for INAC to meaningfully involve First Nations in the authority renewal process. The Chiefs Committee on Education is the proper venue for this process nationally, and FNESC is the appropriate organization to do this work regionally. As INAC unilaterally extended the authority renewal, however, First Nations were excluded from the process.

Post-secondary education is an Aboriginal right. To unify First Nations across the country, I have taken the lead on updating *Indian Control of Indian Education*. This national policy on First Nation education and lifelong learning has been accepted by First Nations and the federal government. There has been significant change since 1973, and it is time to update the national policy. This policy development coincides with the most recent audit report. The results of the audit should align with the priorities identified in the revised *Indian Control of Indian Education*, which will be brought to the AFN Annual General Assembly in July 2009 for ratification.

First Nations Education Steering Committee Society

At this time, we would like to specifically respond to the audit report's recommendations regarding the need to more accurately determine the amount of funding required to achieve the program's objectives and adequately serve First Nations post-secondary students. We believe that the audit report is accurate in highlighting two factors that jeopardize the program's effectiveness: 1. clear evidence of the rising costs of post-secondary education; and 2. the large number of potential First Nations students who are on waiting lists for financial support. We would like to note that First Nations across the country have been emphasizing these specific challenges for several years.

We therefore strongly support the audit report's recommendation that the federal government undertake a review of the sufficiency and appropriateness of funding requirements to ensure that the department is able to meet the objectives of the program. We are confident that such a review will highlight the need for additional funding to ensure that all eligible post-secondary students are provided adequate support.

In addition, we understand that the audit was unable to provide assurance that the program's management is adequate and effective in ensuring that the program is meeting its objectives. Specifically, the audit raises serious concerns about the limited tracking of how the program funds are spent and associated difficulties in terms of program planning. This finding is disconcerting considering the significant reporting and data INAC collects from First Nations. The audit further suggests that reporting challenges make it difficult to determine that there is an equitable allocation of the funding regionally. It would benefit both INAC and First Nations to develop adequate regional models that meet the needs of each region and to have these amalgamated into a national model. There is considerable variation between First Nations across the country. However, all First Nations in BC have been working in collaboration and we will continue to do so.

We fully support the assertion that better information and reporting processes could enhance the program's implementation. First Nations in BC are committed to accountability for this program funding and we support the need to track its effectiveness in meeting the needs of First Nations learners. However, FNEESC also asserts the critical importance of involving First Nations in determining the most relevant accountability mechanisms. In addition, we maintain that the accountability mechanisms must be more holistic than simple financial accountability and reporting.

In fact, First Nations in BC have been working together and with INAC BC Region to address this issue, and we have been refining a regional funding allocation that we believe is both creative and progressive. Through a combined per capita and pooled funding strategy, the BC Region is trying to better meet the post-secondary education needs of all BC First Nations while also accounting for varying needs across the province. Our efforts also reflect our attempt to deal with insufficient resources in the region.

The new BC funding allocation process is also intended to address concerns raised in the recent audit regarding surpluses. First Nations in BC are aware that fluctuating numbers of eligible students can result in variations in community needs over time. This is undoubtedly why the program was established as a flexible transfer payment program. Accordingly, the region is attempting to implement a cooperative allocation process that takes into consideration changing surpluses and deficits in each community's post-secondary education funding.

It also should be noted that the work being done in BC is resulting in enhanced data collection, and FNEESC is making a concerted effort to gather information to substantiate post-secondary education needs in this province and to ensure effective program implementation. While our post-secondary data collection processes still require some improvement, the efforts to date are already resulting in much better information to assist with planning and accountability measures, and we are confident that First Nations, working with INAC BC Region, can respond effectively to concerns regarding the need for adequate stewardship of the program funds.

FNEESC therefore believes that the federal government's response to the recent post-secondary education program audit must take into consideration the work now being undertaken in BC. Further, any changes to the program reporting and allocation mechanisms must be considered in consultation with First Nations, specifically to ensure that the ongoing improvements are continued and enhanced.

In addition, while First Nations in BC understand the importance of gathering relevant performance measurement information to enhance analysis of the program's effectiveness, we would also reiterate the audit report's recognition of the challenges associated with additional reporting from First Nations – especially if the performance measures used are not determined in consultation

with First Nations. First Nations in BC, and indeed across the country, are already subject to significant reporting responsibilities, and it is critical that any consideration of new post-secondary reporting recognize this fact.

We further note that the audit report raises concerns regarding First Nations' adherence to the program terms and conditions. The report recommends that INAC undertake a thorough review of eligible program expenses and update the program terms and conditions and post-secondary guidelines to include those expenses deemed appropriate. While FNEESC supports the need to review the program guidelines to ensure that they adequately reflect the needs of First Nations communities and learners, we strongly believe that a review of the program terms and conditions must be holistic and must be conducted in consultation with First Nations, not by INAC alone.

In terms of the ISSP recommendations, we would like to respond to the audit report's comments on the need to more adequately fund the development of new courses for First Nations and Inuit students, as opposed to the current focus on program implementation. We would like to note that the ISSP funding available in the BC Region is nowhere near adequate to address existing needs. The 34 BC First Nations controlled post-secondary institutes are not provided any core funding, and most of the institutes rely on ISSP as their primary source of financial support. Given that situation, FNEESC asserts that it is unreasonable to suggest a greater emphasis on developmental work unless the existing programs and institutes are provided more sufficient funding.

FNEESC would like to note that the ISSP Committee in the BC Region firmly believes that it is already ensuring that all guidelines are met in terms of the ISSP proposal, financial, and reporting requirements.

Finally, FNEESC would like to assert that those responsible for the audit should report directly to the Standing Committee on Aboriginal Affairs and Northern Development of both the Parliament and Senate.

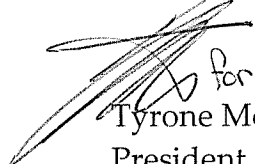
Overall, FNEESC would like to conclude our response by suggesting that many of the post-secondary program challenges that are outlined in the audit report are related to practices and policies of Indian and Northern Affairs Canada itself. However, we believe that changes in those policies and practices, and particularly any revisions to the program's funding methodologies and guidelines, must be considered in consultation with First Nations.

INAC also must support the capacity development of First Nations to ensure the effective administration of the national program. The audit report accurately highlights the importance of the PSSSP, UCEP, and ISSP programs to First Nations learners and communities. First Nations therefore must be fully involved in any comprehensive review of this program, to ensure that any changes appropriately reflect our priorities and circumstances.

I believe that the position highlighted above is also consistent with discussions that occurred during the February 26 meeting of the Standing Committee on Aboriginal Affairs and Northern Development. My understanding is that participants in that meeting raised concern about the lack of consultation with First Nations in regard to the current review of INAC's post-secondary program. We are aware that the federal government is now considering a broad range of possible reform options for the post-secondary program, and First Nations should have been included in these considerations from the outset. We certainly maintain that INAC at least must fully engage First Nations in the review from this point forward.

Thank you for your consideration of this important matter. We would be pleased to discuss these issues with you further at any time.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Tyrone McNeil', is written over a large, stylized scribble.

Tyrone McNeil

President

First Nations Education Steering Committee

cc: FN Leadership Council  
IAHLA Board  
Senate Standing Committee on Aboriginal Affairs and Northern  
Development Parliament Standing Committee on Aboriginal Affairs and  
Northern Development