



**Ministry of Education
Resource Management Division**

2018/19 Distributed Learning Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No. 43 (Coquitlam)

ENCOMPASS AND COQUITLAM OPEN LEARNING

2018/19 DISTRIBUTED LEARNING ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 43 (COQUITLAM)

Background

The Ministry of Education funds boards of education based on the number of student full time equivalents (FTEs) reported by the districts on [*Form 1701: Student Data Collection*](#) (Form 1701). The FTEs are calculated by factoring the number of qualifying courses the student takes. A funding formula is used to allocate funds to boards based primarily on the calculated student FTE.

The Ministry of Education annually conducts Distributed Learning (DL) audits, in selected school districts, to verify enrolment reported on Form 1701. School districts are selected for audit based on a variety of factors, including the length of time since their last audit, enrolment size, and changes in enrolment.

DL programs and courses are alternatives to regular classroom-based instruction for students in Kindergarten to Grade 12 providing a method of instruction that relies primarily on indirect communication between learners and B.C. certified educators, including internet, other electronic-based delivery, teleconferencing, and correspondence. DL takes place when a student is primarily at a distance from the teacher.

Since 2009/10 funding recoveries are expanded to include FTEs outside of the sample where the auditors can make a clear link between the audit findings in the sample and those FTEs outside the sample.

There are over 60 centres reported as public DL schools in the Province totalling 9,910.5626 FTEs as at February 2019 for the 2018/19 school year. Encompass and the Coquitlam Open Learning Centres at School District No. 43 (Coquitlam) reported a total of 604.2500 FTEs for the September 2018 and February 2019 claim periods.

Purpose

The purpose of the DL Enrolment audit is to provide assurance to the Ministry of Education and boards of education that Ministry policy, legislation and directions are being followed. The audits are based on *Form 1701: Student Data Collection, Completion Instructions for Public Schools*, current DL Agreements, and related Ministry policies.

Description of the Audit Process

A DL audit was conducted at Encompass and the Coquitlam Open Learning in School District No. 43 (Coquitlam) during the week of May 27, 2019.

Encompass: The total enrolment reported at September 28, 2018 was 107.0000 FTEs, of which 60 student files and six indigenous service files were reviewed. The total enrolment reported at February 15, 2019 was 12.0000 FTEs, of which 12 student files were reviewed.

Coquitlam Open Learning: The total enrolment reported at September 28, 2018 was 141.8750 FTEs, of which 122 student files were reviewed. The total enrolment reported at February 15, 2019 was 318.1250 FTEs, of which 148 student files were reviewed.

A total of 21.250 FTEs were reviewed for students reported in both the September and February claim periods.

An entry meeting was held with four Assistant Superintendents, the Secretary-Treasurer, the District Principal of Learning Innovations Network Coquitlam, the Principal of Encompass, the Principal of Coquitlam Open Learning, the Vice Principal of Continuing Education and Open Learning, and the Coordinator of Career Programs to review the purpose of the audit and the criteria for funding as outlined in the Form 1701 Instructions.

The process of the audit was reviewed and the District shared a PowerPoint presentation further describing their programs. The administrators and the audit team discussed the steps which the auditors would take to ensure effective communication between the auditors and the schools' administrative team.

The audit team worked out of a large classroom at Coquitlam Open Learning and were provided with a set of computers to access the data. At the time of the audit, the District was revising the process for data storage. Currently the DL Centre utilizes four data systems: Info Pro, Lumens, COLSYS and MyEdBC. The auditors were provided with a tutorial for these systems. It was estimated there will be a single data system utilized to track student information by the Fall of 2019. To expedite the process of working with all of the systems, the staff at Coquitlam Open Learning created a summary blending the information from the four systems. Paper records for each of the students in the samples were located in the work room.

The auditors sought evidence to determine that the courses claimed met the 'active' attendance criteria by the respective data collection submission dates and in accordance with related Ministry directives. Throughout the audit there were ongoing discussions with DL staff to ensure the audit team had an understanding of all aspects of the programs. All recommended adjustments were discussed with the staff during the course of the audit, providing every opportunity to locate the necessary evidence.

An exit meeting was held with three Assistant Superintendents, the Secretary-Treasurer, the Executive Director of Human Resources, a Director of Instruction, the Principal of Encompass, the Principal of Coquitlam Open Learning, the Vice Principal of Continuing Education and Coquitlam Open Learning. The District Principal of Learning Innovations Network Coquitlam participated via telephone. At the meeting the auditors presented their preliminary results and clarified any outstanding issues.

Prior to the audit visit, the auditors undertook a verification of the school-assigned teachers' status with the Teacher Regulation Branch. All teachers were confirmed certified by the Teacher Regulation Branch.

Description of the Program

The Coquitlam School District has two DL Centres. Encompass serves the educational needs of students in Kindergarten to Grade 9. Coquitlam Open Learning serves the learning needs of students in Grades 8 to 12 as well as non-graduated and graduated adults.

At Encompass each student has an individualized learning plan, with access to community based programs and lessons, as well as access to Coquitlam School District services and expertise. Each student is enrolled in a full time program that is delivered between September and June. Parents and students are expected to come into the Encompass facility every two weeks to meet with their teachers. During a one hour meeting there is a check-in, and parents are encouraged to ask questions. The teacher then works one-on-one with the student to assess academic progress through formative and summative assessment, teach or re-teach concepts, conduct hands on activities such as science experiments and set goals for the next meeting. The Principal reported that the bi-weekly consultation has resulted in a sense of community for the online school. An indigenous supplemental program was initiated in the 2018/19 school year.

Coquitlam Open Learning is part of the Learning Innovations Network Coquitlam. The Coquitlam Open Learning program supports the majority of the school age students from the Coquitlam School District including those enrolled in Youth Work in Trades (WRK). There are two teachers assigned to support the students including both non-graduated and graduated adults.

Observations

At Encompass, the auditors found that:

- All student learning plans were dated and signed.
- All student assignments were marked with appropriate feedback from teachers.
- The program followed the District policy to verify that students along with their parent/guardian were ordinarily resident in British Columbia.
- Teacher-developed student learning plans for Kindergarten to Grade 9 (K-9) students claimed for FTE funding were complete and contained details about the program to be followed. The plans contained dates and a documented commitment by the parent. There was evidence of work submitted by the student to the teacher and the work, which was provided as evidence of the student's active participation in the program, was dated.
- The program is to be commended for the high rate of student and parent participation in the K-9 program.
- There were instances of students claimed who were not active as at the claim date.
- The program claimed six students for indigenous supplemental service and while there was evidence of the intent to deliver services, the program and services were not readily available. Upon discussion with the Principal, it was confirmed that the plan in September was to:
 - Make staff aware of student/families who have completed the self-identification of Indigenous Ancestry on registration documentation.
 - Have teachers actively engage in sharing of Indigenous principles of learning in lesson development, selection of resources and delivery.
 - From September onwards, the goal was to utilise and share resources with families.

- Connect with the Coquitlam School District's Indigenous Education Department to ensure all parents have access to publications and resources via an email distribution list.
- Apply in October 2018 for the community garden grant and develop indigenous connections.
- Advocate to share an Indigenous Youth Worker to enhance connections with students and families.
- In November 2018 an Indigenous Support Worker was allocated time to serve the needs of Encompass students and families on Thursday mornings each week.
- The plan for the program was evident at the claim date. An Indigenous support worker started in November 2018. The listed services to the students were tracked in January, April and May.
- It was verified that the following practice was not in accordance with the [Distributed Learning-General Policy](#) regarding reimbursements for third party providers which says: *"The board of education may provide financial assistance to learners or their parents **for a portion of the family's Internet connection fees**, if and only if the learner requires an Internet connection to participate in an educational program delivered in whole or in part through distributed learning"*. The Centre's reimbursement guidelines state that internet fees of \$35.00 a month per family are reimbursable if the internet is required as part of the child's program and as indicated in the child's learning plan. There was evidence in the student files that a variety of internet charges were being reimbursed by the District to parents.

At Coquitlam Open Learning (COL), the auditors found that:

- All student learning plans were dated and signed.
- All student assignments were marked with appropriate feedback from teachers.
- Substantive student course activities were dated enabling verification of the date the activities were submitted and the date the course was activated.
- COL followed the District policy to verify that students were ordinarily resident in British Columbia.
- The student documentation was organized according to month and category, and the student files were easily accessible.
- The staff were responsive to the many queries and provided explanations of processes and procedures. Clarification requests were responded to in a timely manner.
- The majority of the Youth Work in Trades (WRK) evidence was well organized and accessible, indicating valuable educational services are being provided to students.
- It was not clearly evident when a student had withdrawn from a course and there was no evidence of a Board Policy regarding student withdrawal.
- The required minimum five percent of the course's learning activities varied and was teacher dependent. The Principal and teachers were able to verify the minimum five percent of the learning activities were being met before the claims in the audit sample were made.
- Graduation plan requirements were completed by the students and often incorrectly identified only the completed courses. There were inconsistencies identifying the graduation status of adults. In several instances the adult student was identified as graduated in September 2018 and non-graduated in February 2019.
- A significant number of student files had evidence that the student completed the required five percent of the course's learning activities and then withdrew from the course.

- Contrary to the *School Act* and the Eligibility of Students for Operating Grant Funding Policy Districts cannot charge any fees associated with a funded course claim or for educational resource materials necessary to participate in the educational program. The reference is Section 82 of the *School Act* and the [Eligibility of Students for Operating Grant Funding Policy](#) which says: *Students who are ordinarily resident or deemed resident in British Columbia are entitled to provincial funding under section 82 of the School Act; boards may not charge fees for these students except in accordance with Section 82 of the School Act.*

Fees and deposits

82 (1) A board must provide free of charge to every student of school age resident in British Columbia and enrolled in an educational program in a school operated by the board,

(a) instruction in an educational program sufficient to meet the general requirements for graduation,

(b) instruction in an educational program after the student has met the general requirements for graduation, and

(c) educational resource materials necessary to participate in the educational program.

(2.1) Subject to subsection (2.2), if a board permits a student who is older than school age and is ordinarily resident in British Columbia to enrol in an educational program leading to graduation, the board must provide free of charge to that student

(a) instruction in an educational program sufficient to meet the general requirements for graduation, and

(b) educational resource materials necessary to participate in the educational program.

(3) Subject to subsections (1) and (2.1), section 82.4 and to the orders of the minister, a board may charge fees for goods and services provided by the board.

Only those approved goods and services per Section 82(3) can be charged a deposit. No fees associated with the provision of a funded educational option can be charged to students.

- The Centre was charging a deposit of \$100.00 to all students at the time of registration. The wording the DL Centre used was: "*The deposit is for commitment to active participation in the course and/or for materials/textbooks that may be issued as part of the program of study.*" School age students were required to complete five percent of the course to receive a full refund, less any material/textbook damages. School age students who withdraw at any time prior to completing the first five percent of the course are refunded 40 percent of the deposit. Adults were required to pay a deposit receiving a full refund at completion of the course. Adults who withdraw at any time prior to completing the first five percent of the course are also refunded 40 percent of their deposit. The district will reduce or waive the deposit in cases of financial hardship.
 - As fees charged for funded courses is an ineligible practice with courses recommended for recovery, contact was made with Carey Chute, Assistant Superintendent, who confirmed that *Based on feedback we have received, the District is proposing to update this policy as follows: Book deposits will be charged in cases where students choose to take school copies of course books home to facilitate study. These deposits are fully refundable when books are returned. These deposits may be reduced or waived by administration in cases of financial hardship. No student will be denied access to registration based on an inability to pay the book deposit. As per our discussion, if the update to this wording is consistent with your recommendations, we will apply it retroactively to all September and February claims.*
- In some instances, the report cards identified Planning 10 as the eligible course instead of the current requirement of Career Life Education.

- Several students were incorrectly reported for English 10, a four credit course, yet were enrolled in a two credit English course.
- The District offers Applications of Digital Learning to Grade 9 students, in their standard schools, as a Grade 10 DL option.
- There was evidence that several students were claimed for more courses than they were taking including graduated adults taking ineligible courses not on the list of [Tuition Free Options](#).
- One student reported for an Independent Directed Studies (IDS) option was without evidence documenting the learning standards, the number of credits for the course, or the approval of the principal in accordance with Independent Directed Study criteria identified in the [Graduation Program Order](#) (M302/04): *"independent directed studies" means an area of study in an educational program undertaken by **a student** that is (a) related to or is an extension of one or more of the learning outcomes established in an educational program guide listed in Ministerial Order 333/99, the Educational Program Guide Order, or in a Board Authorized Course, (b) undertaken pursuant to a plan developed by **a teacher and a student** and approved by a principal, vice principal or director of instruction, and (c) carried out by **the student** under the general supervision of a teacher.*

Audit Sample Findings

The auditors found that:

- 4.0000 Kindergarten to Grade 9 FTEs reported in September and 1.0000 FTE in February were not active in the program as required by the DL Active Policy and in accordance with Form 1701 Instructions.
- 0.3750 Grade 10-12 school age FTEs did not meet the attendance criteria at the February claim date. The Principal verified these were ineligible claims.
- 0.1250 Grade 10-12 school-age FTEs were claimed for funding in February for an ineligible option labelled as an Independent Directed Study (IDS) four credit course without evidence to support the claim.
- 0.2500 Grade 10-12 school-age FTEs were reported in February for a duplicated course claim.
- 0.3750 Grade 10-12 FTEs were claimed for funding in February for a four credit course when they had taken a two credit course. The principal presented the auditors with a list of the students who were mistakenly claimed.
- 0.2500 non-graduated adult FTEs were reported in September for a duplicated course claim.
- 0.1250 non-graduated and 0.1250 graduated adult FTEs were reported in February for re-enrolment in a course claimed during a previous DL funding period, contrary to the [DL Funding Policy](#) which states that: *"For boards to be eligible for funding for the same DL course taken in the same DL school by Grade 10-12 students (including adults) the following conditions must be met:*
 - *The student must have been previously reported as failed (through course completion), or as course completed and wanting to improve their mark or withdrawn from that course.*
 - *If a student has withdrawn from a course or did not complete a course, there must be a record of student inactivity for two DL enrolment counts, with a corresponding record of attempts made by the DL school to contact the student for that course."*

Additionally, as identified in the Form 1701 Instructions: *"Courses encompass only one organized set of learning outcomes. While completion of the course's learning outcomes*

may be over a number of registration periods, only one course is undertaken and therefore eligible for only one funding claim.”

- 0.1250 graduated adult FTEs were reported in September for a course not on the tuition free option list.
- 0.1250 graduated adult FTEs were reported in February for a course not on the tuition free option list.

Recommendations

The auditors recommend that:

- Encompass staff ensure all students are enrolled and active as at the claim date and in accordance with the DL Active Policy and Form 1701 Instructions.
- Encompass staff ensure that students reported for indigenous supplemental funding are receiving an indigenous program and services with a plan for the delivery of those services in place as at the September claim date, in accordance with the Form 1701 Instructions.
- The District ensure the Encompass staff immediately cease the provision of funding to families for internet access service and align their practices with the requirements outlined in the DL General Policy regarding the limits to financial assistance for learners or their parents which says: *The board of education must not provide financial payments or reimbursements to learners or their parents, nor may they use any amount of money budgeted to support an educational program as an incentive to have a learner enroll in a distributed learning program or course.*

The board of education may provide financial assistance to learners or their parents for a portion of the family's Internet connection fees, if and only if the learner requires an Internet connection to participate in an educational program delivered in whole or in part through distributed learning.

The board may lend, but not give, equipment with an asset value (such as a computer that is required for participation in a distributed learning program or course) to learners or to parents or families of learners.

NOTE: the amount of the operating grant to be used for third party resourcing would not apply to: A portion of the family's Internet connection costs if required to participate in a DL program or course. Connection means cost of the household connection to the internet. It does not include ongoing maintenance.

- The District immediately realign their current fee charge practice at COL to align with Ministry directives when educational options are claimed for funding.
- The COL staff ensure that courses are claimed only when the DL Active criteria is met and in accordance with the Form 1701 Instruction directives.
- COL staff ensure that no funding claims are submitted for students who have not met the requirements of the DL Active Policy.
- As all student withdrawals are to be undertaken in accordance with Board Policy, the District is required to create a withdrawal policy consistent with the requirements of the [Provincial Letter Grades Order](#).
- COL staff ensure clear and consistent guidelines and practice for determining where the minimum five percent substantive student course activities reside in accordance with the DL Active Policy requirements.
- COL staff develop a process ensuring students have completed the online Student Learning Account Application with correct information and in accordance with the DL Active Policy.

- Given the high rate of withdrawals, once the active attendance requirement has been met, the District implement process to ensure student engagement is a priority for the COL staff.
- COL staff ensure all funded options align with the current curriculum and that course selection/enrolment forms list only those DL courses reported for funding that meet graduation requirements or the tuition free choices.
- COL staff be required to ensure the accuracy of all reported claims before remitting for funding including verification of the credit assignment for each of the eligible courses.
- COL staff refrain from duplicating course claims and align their practices with the requirements of the DL Funding Policy and Form 1701 Instructions specific to the continuation of learning in the same course.
- Only the Tuition Free courses are eligible claims for Graduated Adults. Adults can be charged fees for those courses which are not eligible options (Ref. [Adult Funding Policy](#)).
- The District and COL staff when reporting Grade 8-9 secondary school students taking Grade 10-12 options through DL must follow the [DL Funding Policy](#) which says: “A student enrolling only in Grade 10-12 courses in a DL school, who is also enrolled in Grades K-9 in another school, is counted as a Grade 10-12 student for DL funding purposes.” As a Grade 10-12 course claim the evidence for the Applications of Digital Learning or any other Grade 10-12 option must follow the DL Active policy requirements:
 - A clear course plan must be on file for each course. This course plan must link to the course’s learning standards and /or outcomes, required resources and assessment strategies. This course plan is the evidence supporting the requirement that assigned work is meeting the learning standards and/or outcomes.
 - A current course selection or enrolment form must list the distributed learning courses reported for funding that meet graduation requirements.
 - Substantive student course activity or activities must be submitted by the student to the teacher: evidence of a current course selection or enrolment form, dated, and signed by the student parent or both. These forms must list each eligible course that is reported for funding. The forms must be on site, or documentation must be readily available to verify that the school of record maintains that course selection or enrolment form.
- The District ensure all schools refrain from incorrectly labelling educational options as IDS and, in consultation with District staff, amend any current use of IDS course codes for educational options that do not align with the Graduation Program Order, the current Graduation Program and are not extensions of one or more of the Ministry Authorized and BAA courses learning standards. Those options that do meet the requirements of IDS, when provided through DL, are still required to meet the DL Active requirements including evidence of a course plan which references the curriculum learning standards as created by the student and the teacher and approved by a school board designate. The creation of the course plan is not part of the substantive student activity required to meet the attendance requirement for active participation.
- To ensure the outcomes and recommendations identified during the audit are adhered to and the proposed updating of the various data systems align with Ministry directives, the District’s DL centres be scheduled for a return audit.

Auditors' Comments

The auditors wish to express their appreciation to the District staff for their cooperation during the audit.

**Funding and Financial Accountability Branch
Resource Management Division
Ministry of Education
June 3, 2019**
