



**Ministry of Education
Resource Management Division**

2018/19 K-12 Regular Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No. 49 (Central Coast)

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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 Kindergarten to Grade 12 (K-12) Regular Enrolment 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.

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.

In the 2018/19 school year, boards of education reported a total of 555,288.8595 FTEs in Kindergarten through Grade 12. School District No. 49 (Central Coast) reported a total of 264.8750 FTEs or 264 students, including 16 students for English Language Learners (ELL) and 175 students for Aboriginal Education.

Purpose

The purpose of the K-12 Regular 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* and related Ministry policies.

Description of the Audit Process

A K-12 Regular Enrolment audit was conducted in School District No. 49 (Central Coast) during the week of March 4, 2019. The schools audited were:

- Nusatsum Elementary/Secondary
- Sir Alexander Mackenzie Secondary

The total enrolment reported by these schools on September 28, 2018 was 163.8750 FTEs, of which 164 student files were reviewed.

An entry meeting was held on March 4, 2019 with the Superintendent, each school's Principal, the Aboriginal Education Coordinator and a school clerical person to review the purpose of the audit and the criteria for funding as outlined in the Form 1701 Instructions.

The audit team visited each school to review student files, interview staff, and conclude on their observations. The audit team followed a process in each school which gave administrators and program staff every opportunity to locate and present additional evidence when the team found that such evidence was not available in the documentation presented by the school.

An exit meeting was held on March 7, 2019 with the Superintendent and each school's Principal, the Aboriginal Education Coordinator and a school clerical person. At the exit meeting the auditors presented their preliminary results and clarified any outstanding issues.

The audit included the enrolment reported in the 2018/19 school year. The areas audited were:

- September 28, 2018 enrolment and attendance
- Ordinarily Resident
- School-Age Grade 10-12 Course Claims
- Adult Student Claims
- English Language Learning Supplemental Claims
- Aboriginal Education Supplemental Claims

Prior to the audit visit, the auditors undertook a verification of the school-assigned teachers' status with the Teacher Regulation Branch. This was an area of concern as four teachers currently employed by the district were still awaiting approved Letters of Permission from the Teacher Regular Branch and one teacher was awaiting B.C. certification for eligibility to teach in B.C.

Observations

The auditors found that:

- 0.7500 school-age Grade 10-12 FTEs claimed for funding were enrolled in and attending fewer courses than reported at the Data Collection claim date.
- 19 students were reported as receiving supplemental Aboriginal Education Program and/or Services
 - Two students were verified as not of aboriginal ancestry and did not want to participate in the program. The [Form 1701 Data Collection Instructions](#) and the [K-12 Funding-Aboriginal Education policy](#) identifies for a student to be reported as receiving an Aboriginal Education program or service, the school age student must be self-identified as being of Aboriginal Ancestry and provided with supplemental services in addition to any other programs and services to which the student is eligible.
 - 17 students were verified not to have received any services and/or support in accordance with the Form 1701 Data Collection Instructions and the K-12 Funding-Aboriginal Education policy.
 - While the schools did not utilize a method to retain evidence of Aboriginal Education service provision the audit team used anecdotal evidence, when available, to support the claims.
 - The District's current Enhancement Agreement (2014 to 2019) outlines programing with two specific goals: to increase the sense of belonging and community relations with students, families, schools and community members; and, academic achievement of aboriginal students. Monthly reports by the Indigenous Home School Coordinator and

the Youth Care Worker were used to quantify what services, if any, the students participated in (i.e., connecting with the home, food program, team meetings, parent meetings, transportation, emotional support, academic support, home visits and referrals to other services). The auditors were advised that the elementary school's process is to offer services as required by the students. At the secondary school academic language classes were in place as part of the students' annual educational program with limited supplemental services.

- In an effort to provide the Nuxalk Language and Culture, the District created two Board/Authority Approved courses for students. These courses were verified to be funded educational options which were part of the student's standard educational program and not in addition to any other program and service to which students are eligible.
- In preparation for the March 2019 audit the District tried to complete Teacher Regulation Branch (TRB) application processes for five individuals employed as teachers. The [K-12 Funding Policy](#) requires that: *"To be eligible for provincial funding, Boards of Education must ensure that students are: under the supervision of, assessed and evaluated by an employee of the Board of Education who is certified by the Teacher Regulation Branch"*. Four of these teachers were currently teaching in the two schools selected for audit.
 - One individual certified in Alberta was applying for their B.C. certification.
 - Three individuals have been in the District ranging from two to seven years.
 - One individual was new to the District this year and was currently waiting certification.
 - For new teachers, the District requires individuals to pay an application amount, which is then reimbursed and enables the assigned clerical staff to relay all required documentation to the TRB. These submission were done in December 2018 and January 2019. There was no evidence of a follow-up process regarding the status of any of the applications including evidence from subsequent years confirming there are individuals currently without certification or a Letter of Permission (LOP).
 - There was no evidence that the District investigated teacher certification for individuals who were recurring educator applicants.
 - In one instance, a criminal records check was not done as per District Policy. The record check was initiated during the March audit.
 - 2.1250 school-age Grade 10-12 FTEs claimed were for courses taught by a non-certified individual. The LOP application was specific to teaching French and Career Life programs. The application to the TRB was submitted by the District on January 31, 2019 and was still pending at the March 2019 audit date. It was verified that the individual, in addition to teaching within the LOP application, was also teaching courses outside of the LOP (Family Studies 12 and Graduation Transitions 12) and was working as an Academic Adviser.
 - 0.3750 school-age Grade 10-12 FTEs were claimed for funded courses taught by a non-certified individual. There was no evidence of an application to the TRB for an LOP or certification at the time of the audit.
- Currently the District does not have a withdrawal policy. In accordance with the [Provincial Letter Grades Order](#) all withdrawals are undertaken in accordance with *"the policy of the board, and upon request of the parent of the student or, when appropriate, the student, the principal, vice principal or director of instruction in charge of a school may grant permission to a student to withdraw from a course or subject."*

- There was no evidence of an annual schedule of fees. In accordance with the [School Act](#) Section 82 (6) *A board must publish a schedule of the fees to be charged and deposits required and must make the schedule available to students and to children registered under section 13 and to the parents of those students and children before the beginning of the school year.*
- New Media and Philosophy 12 were two newly created courses offered at the secondary school. Neither of these options were Board/Authority Approved (BAA). The decision was made by the District to label these options as Independent Directed Studies (IDS) which does not align with the definition in the [Graduation Program Order](#) (M302/04): **Definition:** *"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.* Students did not *"initiate their own area of learning"* the plan for each student was not *"developed by that student and a teacher"* and it was not *"approved by a principal"*. In this instance only, as students were provided with actual educational sessions which were incorrectly labelled as elective IDS options, there are no recommended recoveries. The District staff indicated these options would be converted to BAA options in March at a special Board meeting.
- While there was evidence of English Language Learning (ELL) program service provision to the students, there was no ability to verify that there was a *"specialist teacher involved in the development of the instructional plan and participates in a regular review of that plan during the school year (at a minimum, at each student reporting period)"* as required per the Form 1701 Instructions, the [English Language Learning Policy and Guidelines](#), as well as the [K-12 Funding-English Language Learning Policy](#).

Recommendations

The auditors recommend that:

- District staff be required to ensure the accuracy of all reported claims before remitting for funding including verification of each student's annual education program towards graduation consists of eligible courses.
- The District ensure schools report only those eligible courses in which the student is enrolled and in attendance as at the Form 1701 claim date, including evidence to verify the Grade 8 to Grade 12 claims.
- The District must put accurate procedures in place ensuring all individuals working as teachers have been registered with the TRB either as a certified teacher or as a teacher with a valid LOP that is specific to the position held.
- To meet the [K-12 Funding-General Policy](#) requirements: *To be eligible for provincial funding, Boards of Education must ensure that students are: under the supervision of, assessed and evaluated by an employee of the Board of Education who is certified by the Teacher Regulation Branch,* the District staff ensure that all applications to the TRB are in evidence at the start of the school year and that a tracking process regarding educators' pending status be implemented.

- A District process be developed to ensure criminal record checks are undertaken prior to any staff assigned to work with students, as per the District's Policy.
- The District ensure that a plan for the delivery of Aboriginal Education programs/services is in evidence at the time of the Data Collection claim date and that only those eligible students provided with Aboriginal Education support in accordance with Ministry directives are reported for supplemental funding.
 - The delivery of any courses leading to graduation are not part of the eligibility for Aboriginal Education programs or services. These supplemental services are to be in addition to any other programs and services to which the student is eligible.
- The District ensure when moving forward to create actual BAA options that the following requirements are undertaken:
 - The [BAA Guidebook](#) (P.8-9) states that *"Schools must have the approval of their Boards of Education or Independent School Authorities prior to offering a BAA course, regardless of whether the course has already been approved in another jurisdiction...Once the BAA Course Form is signed by the appropriate authority indicating the course is compliant with provincial requirements, the course may be offered to students" ...and from the [BAA Order](#): "A board may not offer a Board Authorized Course to students as meeting the Minister's requirements for graduation until the superintendent for the school district and the board have approved the Board Authorized Course in the manner and form required by the Minister. No Board Authorized Course shall be offered for use in a school as meeting the Minister's requirements for graduation until the board (a) on receipt of a request of the superintendent for that school district, approves the Board Authorized Course, (b) has submitted the required information in the manner and form required by the Minister."*
 - In addition, as identified in the BAA Guidelines, options that are **not eligible** for Board/Authority authorization are:
 - ***"Courses with significant overlap with provincial curriculum content: This includes adapted courses, partial versions of Ministry courses, and hybrids of two or more Ministry courses.***
 - *Remedial courses or those preparatory in nature: For example, a math course designed to help students who have completed Foundations of Mathematics and Pre-calculus 10 that provides review and remediation for them before they enroll in Foundations of Mathematics 11; or a writing course designed to help students develop the skills needed to meet the learning standards of Creative Writing 10.*
 - *A modified course: For example, a social studies course designed for Grade 10 students with intellectual disabilities with significantly different learning standards from Ministry Social Studies 10.*
 - *An adapted course: Adaptations are teaching and assessment strategies especially designed to accommodate a student's needs so they can demonstrate that they are meeting the learning standards of the curriculum. A student working to meet learning standards of any Grade or course level may be supported through use of adaptation."*
 - Districts must fulfill their obligation by submitting the BAA course form to the Ministry of Education's Student Certification Branch notifying the Ministry of the newly developed course and confirming BAA course requirements had been met. The [BAA Policy](#) says: *Boards of education and independent school authorities are required to submit a BAA Course Form for new courses electronically to the Ministry at*

student.certification@gov.bc.ca. Boards and school authorities must retain the full BAA Framework for review by the Ministry when requested.

- The District adhere to the ELL requirements including evidence that an ELL specialist teacher is involved in the development of the instructional plan and participation in the review of the plan throughout the school year. From P.14 of the ELL Policy and Guidelines: *Districts need to employ ELL specialists to be involved in language assessment/review, planning and delivery of programs/services, and reporting of progress and services for ELL students. These specialists should have appropriate qualifications, knowledge, skills, and practical experience. Specialized education for ELL specialist teachers should consist of post-secondary academic preparation in a combination of the following areas: Methodology and appropriate approaches for teaching ELL; Applied linguistics; First and second/additional language acquisition/learning; Language assessment/testing theory and practice; Cross-cultural communication, understandings, sensitivity, and strategies; Multicultural studies; and Adapting instruction to meet the diverse language needs of students.*
- The District create a Withdrawal Policy consistent with the requirements of the Provincial Letter Grades Order.
- The Board ensure that there is an annually approved list of fees as per the *School Act* Fees and deposits Section 82, subsection (6) and to make the fee schedule available before the beginning of each school year.

Auditors' Comments

The auditors extend their appreciation to the District and school-based staff.