



**Ministry of Education
Resource Management Division**

2018/19 Distributed Learning Enrolment Audit

AUDIT REPORT

SCHOOL DISTRICT No. 58 (Nicola-Similkameen)

South Central Interior Distance Education

2018/19 DISTRIBUTED LEARNING ENROLMENT AUDIT REPORT

SCHOOL DISTRICT No. 58 (Nicola-Similkameen)

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. The South Central Interior Distance Education at School District No. 58 (Nicola-Similkameen) reported a total of 196.2500 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 South Central Interior Distance Education in School District No. 58 (Nicola-Similkameen) during the week of May 6, 2019. The total enrolment reported at February 16, 2019 was 196.2500 FTEs, of which 269 student files were reviewed.

An entry meeting was held at the Board Office with the Superintendent, Assistant Superintendent (via video conference), Secretary-Treasurer, Assistant Secretary-Treasurer, Executive Assistant and the DL Centre's Principal 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. The

administrators and the audit team discussed the steps, which the auditors would take to ensure effective communication between the auditors and the school's administrative team. The Principal provided further information of the program at the school site.

The audit team worked out of a large classroom within the DL school and were provided with a set of computers for use in accessing the school's data. Paper records for each student included in the audit sample were located in the workroom. The auditors sought documentation to determine that the courses claimed met the 'active' attendance criteria and other related Ministry directives by the respective activation submission dates. Throughout the audit there were ongoing discussions with the Principal and DL staff to ensure the audit team members had an understanding of all aspects of the program. Any possible 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 the DL Principal, Assistant Superintendent and Executive Assistant. 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.

Description of the Program

The South Central Interior Distance Education School (SCIDES) is located in a former elementary school. Also housed within the same facility is a Continuing Education and Alternate Education Program. The DL program began as a Regional Correspondence School in 1990. Currently SCIDES offers K-12 educational options for full time students, Grade 8 to 12 courses, Special Needs services and Adult education options toward graduation and upgrading. The elementary options are primarily paper based with the secondary and adult programs electronically based. SCIDES has multiple systems in place to ensure the effective tracking of student work and recordkeeping.

Observations

The auditors found that:

- All student learning plans were dated and signed.
- All student assignments were marked with appropriate and substantive feedback from teachers.
- Documents were readily available enabling auditors to verify the date substantive student activity was submitted and the date the course was activated.
- SCIDES follows the District policy to verify that students along with their parent/guardian (where applicable) are ordinarily resident in B.C. SCIDES has a well-defined process in place to verify the student is ordinarily resident for each claim period.
- Teacher-developed student learning plans for Kindergarten to Grade 9 students were available for each student claimed for funding. These plans, with corroboration by the parent, were the documentation of the parents' commitment to the student learning plan. The plans contained dates and documented commitment by the parent. There was evidence of work submitted by the student to the teacher and the work provided as evidence of the

student's active participation in the program was dated.

- While the district currently has no Board policy regarding the conduct, supervision, evaluation and participation of students in Work Experience 12 (WEX) courses in accordance with the [Elective Work Experience Courses and Workplace Safety Policy](#), the [Work Experience Order M237/11](#), the evidence required to verify funding claims for WEX were well organized and accessible, indicating valuable educational services are being provided to students.
- All members of the teaching staff are currently certified with the Teacher Regulation Branch.
- SCIDES is in accordance with the [DL-General Policy](#) regarding financial reimbursements to third party providers and had documentation outlining current practices internally.
- SCIDES has no written statement or consistent manner in which to inform students and/or parents regarding approval and reimbursements for third party provision of services.
- While the DL-General Policy requires that DL Centres “*Clearly describe its responsibility to provide the program outlined in a student’s learning plan or Individual Education Plan separately from additional services the student may receive from the service provider*” SCIDES did not consistently ensure a clear connection between learning plans and third party funding approval.
- Not all students claimed for supplemental aboriginal funding were found to have received on-going services and/or support.
- As SCIDES is initiating Youth Train in Trades (TRN) and Youth Work in Trades (WRK) options, in addition to ensure each course claim meets the DL attendance requirement, the following is provided to ensure adherence with the Ministry directives for these Youth options.
 - The District ensure that all schools providing WRK options are aware of these Ministry authorized course requirements including evidence:
 - that there was the provision of an in-school orientation session prior to placement with an Industry Training Authority (ITA) recognized sponsor;
 - student has a current ITA registration form;
 - school coordinator has registered the student as a youth apprentice with ITA;
 - school coordinator has retained copies of all forms required for registration and retains the student’s ITA registration number required for the duration of the apprenticeship including verification of work site WorkSafeBC coverage;
 - of a separate and distinct training plan for each of the courses for the student and sponsor created by an educator in conjunction with the ITA sponsor, with the coordinator and sponsor required to keep track of all trade specific learning standards each student has been taught;
 - the work based training hours are accrued only after the student is registered as an ITA youth apprentice;
 - students are taught and assessed on the curriculum of WRK before they are given WRK credit;
 - students are monitored and evaluated by an educator with valid teaching certificate; and
 - for recognition of prior work (students working in a trade but not enrolled in a WRK program for up to 240 hours) requirement is for the educator to first validate student’s work in trade at the same time the student is registered with ITA, then teach and assess learning standards required for WRK course credit. Claims for WRK based on recognition of prior work must have evidence including validation of work and

- registration with ITA; there is a sponsor signed work based training report with dates and hours of the prior work sought for ITA recognition; and, there is evidence an educational program was provided.
- The following are requirements and considerations Districts are to follow when offering TRN to their students including those provided through third party Post-Secondary Institutions (enabling credit towards graduation in the K-12 system and credit acquired towards specific occupation in the post-secondary realm).
 - K-12 Funding General Policy <https://www2.gov.bc.ca/gov/content/education-training/k-12/administration/legislation-policy/public-schools/k-12-funding-general> which says: *Courses taken in BC outside of the public school system (through colleges, post-secondary institutions, private organizations, etc.) are not funded unless permission and support is arranged through the Board of Education, and the course is taken for credit towards grade 12 graduation.*
 - Summary of an eligible Post-Secondary Transition options from the Recognition of Post-Secondary Transition Programs for Funding Policy identifies that:
 - Option is to align with student's specific occupation which the student will undertake once they have completed their secondary school education.
 - Student has met all prerequisites by the student in advance of the post-secondary course(s).
 - The course/program of courses aligns with the ITA sanctioned TRN options towards a trades certification.
 - The course/program of courses provides dual credit (elective credit towards K-12 graduation and credit for the specified TRN certification outlined in the transition plan).
 - Option is being undertaken by students as part of their transition program during their Grade 11 or Grade 12 year.
 - The student's plan list their transition program course(s), including when and where they will be taking their eligible post-secondary TRN courses.
 - The District does not currently have a withdrawal policy in accordance with the [Provincial Letter Grades Order](#)

Audit Sample Findings

The auditors found that:

- Two students reported for Indigenous Education supplemental funding were without additional services or support.

Recommendations

The auditors recommend that:

- A Board policy be immediately implemented to establish guidelines regarding conduct, supervision, evaluation and participation of eligible students as required in accordance with the [Elective Work Experience Courses and Workplace Safety Policy](#), the [Work Experience Order M237/11](#).
- As all student withdrawals are to be undertaken in accordance with Board Policy, the District create a withdrawal policy consistent with the requirements of the Provincial Letter Grades Order.

- SCIDES ensure all students claimed for indigenous education supplemental funding are provided with on-going services and supports in accordance with the Form 1701 Instructions.
- SCIDES undertake to clearly describe its responsibility to provide the program outlined in a student's learning plan or Individual Education Plan separately from additional services the student may receive from the service provider.
- SCIDES develop a written statement or consistent manner in which to inform students and/or parents regarding approval and reimbursements for the provision of third party services.

Auditors' Comments

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