



**Ministry of Education  
Resource Management Division**

**2018/19 K-12 Regular Enrolment Audit**

**AUDIT REPORT**

**SCHOOL DISTRICT No. 43 (Coquitlam)**

## **2018/19 K-12 REGULAR 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 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. 43 (Coquitlam) reported a total of 30,431.7500 FTEs or 29,961 students, including 4,738 students for English Language Learners (ELL) and 1,293 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. 43 (Coquitlam) during the week of February 4, 2019. The Alternate Education Program audited were:

- Coquitlam Alternate Basic Education (CABE)
- LINC-Customized Learning Centre (LINC-CLC)
- Encompass 10-12
- Tri-Cities Soar
- Suwa'lkh School

The total enrolment reported by these schools on September 28, 2018 was 429.000 FTEs, of which 245 student files were reviewed.

For each of the schools audited, a segment of the students reported in the 2018/19 school year were selected for review. An entry meeting was held on February 4, 2019 with the Secretary-Treasurer, three Assistant Superintendents, a Director of Instruction, District Principals, a Program Coordinator and each school's Principal and a Vice Principal (Tri-Cities Soar) 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 February 8, 2019 with the Superintendent, Secretary-Treasurer, three Assistant Superintendents, two Directors of Instruction, two District Principals, and each school's Principal or Vice Principal. 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
- Alternate Education Programs
- 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.

## **Observations**

The auditors found that:

- Briefings on programs and contents of files were delivered at each Alternate Education Program school site including how the programs were organized and designed.
- The organization and ease of accessing evidence necessary was readily available in all schools except Tri-Cities Soar.
- 24.0000 school age FTEs were verified as not enrolled and in attendance at the September claim date. Without evidence aligned with the eligibility criteria, the adjustment reflects the student's non-attendance at the claim date as well as a declassification from any special needs category (where applicable).
- 17.0000 school-age FTEs were verified as without evidence that the students were provided with any specialized servicing aligned with the [Alternate Education Program Policy](#). In accordance with the Alternate Education School Program Policy: *Alternate education programs must satisfy certain requirements to be deemed a type Three facility. If the programs meet those requirements, then their students qualify for 1.0 FTE (full time equivalent) funding to the school district. Alternate education programs must focus on the educational, social and emotional issues for students whose needs are not being met in a traditional school program. The policy states..."Each Alternate Education Program will*

have: 1) An intake process to facilitate district referrals or self-referral; 2) An annually reviewed learning plan for each student, either an official Individual Education Plan (IEP) or a Student Learning Plan that clearly defines the objectives for the student, additional services provided as required, progress made, and any transition plans.; 3) An exit strategy to facilitate the students transition either back into regular school system, continuing education centre, graduation, or to work and to post-secondary training and education; and 4) Evidence of additional services as required by the student population”. There was no evidence these students received differentiated instruction, specialized program delivery or enhanced counselling services specific to each students’ needs, nor of individualized clearly defined objectives, recognition of additional services each student required, what progress is/was made or transition plans or exit strategies for each student claimed.

- As the majority of the student files at Tri-Cities Soar were without evidence of required service provision, it was only through the School Counsellor’s ‘recollections’ that any indication of student service was able to be identified.
- 15 students reported as receiving an Aboriginal Education program and/or service were without evidence of service provision which was in addition to any other programs and services to which the student is eligible in accordance with the [K-12 Funding Aboriginal Education Policy](#) and the [Form 1701 Instructions](#) (P.10-11). Ministry of Education Policy states that: *school-students of Aboriginal ancestry participating in Aboriginal Education programs and services are eligible for Aboriginal Education funding if all of the following criteria are met:*
  1. *evidence that the student has self-identified as being of Aboriginal Ancestry;*
  2. *evidence that the parent or guardian of the student has been consulted;*
  3. *evidence that the Aboriginal Education programs and services have involved the Aboriginal communities in planning and delivery;*
  4. *evidence that the Aboriginal Education Program is in addition to any other programs and services to which the student is eligible;*
  5. *evidence that the Aboriginal Education programs and services provide a continuum of substantive learning experiences and/or support services throughout the school year.*

Additionally it is required that a plan for the delivery of these Aboriginal Education Programs and/or Services must be in evidence at the time of the September claim.

  - One student was verified as not enrolled and in attendance at the September claim date.
  - Five students at LINC-CLC were without evidence of any supplemental service in accordance with the Form 1701 Instructions and the K-12 Funding Aboriginal Education Policy due to the District’s inability to hire an Aboriginal Education Support Worker for the centre until December 2018. It was verified that there was no evidence of a plan for the delivery of Aboriginal Education Programs and/or services in evidence at the time of the September 28, 2018 claim nor any attempt to allocate support service staff from other District schools to support the students claimed by CLC as receiving this supplemental funding. In this instance only, the supplemental funding recovery is in recognition of services in place to the students for the latter half of the school year when the school was able to provide program planning and service for the period of January to June 2019.
  - CAGE enrolled students reported as being participants in the GOAL program (a program intended to service the educational and social needs of youth who have become involved with Youth Probations; had difficulties with other regular or alternate school settings; or,

were without formal schooling for a significant period of time) were without evidence of any Aboriginal Education services and/or supports.

- It was verified that while the District annually emails the families enrolled in the District advising of a service provision option, the information resulting from the student/parent responses was inconsistently recorded in student files.
- Two students reported as receiving English Language Learning (ELL) by CAFE were without evidence of service provision in accordance with the [ELL Policy and Guidelines](#). Although a program involving four classroom teachers was designed to provide support for English Language Learners, there was no evidence of a specialist teacher involved in the development of the instructional plan nor of participation in a regular review of that plan by the specialist during the school year.
  - one of the two students verified without service was not enrolled and in attendance as at the September claim date.

### **Recommendations**

The auditors recommend that:

- Schools claim only those students who are enrolled and attending at the September Data Collection claim date.
- The District's Alternate Education Programs report students only when the processes necessary to qualify under the requirements of the Alternate Education Program Policy are met, as at the Form 1701 data reporting date.
- The District refrain from reporting FTEs not aligned with the requirements of the Alternate Education School Program Policy and ensure that students reported as receiving an Alternate Education School Program have evidence of the service in addition to what is provided to the general student population at the District's traditional schools.
- The Alternate Education Program schools amend their current practice of routinely reporting students until it has been verified that only those individuals who are in attendance and scheduled for the appropriate service provisions specific to a Type 3 facility are claimed at the Data Collection date. As a Type 3 facility, the Alternate Education Program must identify service provision for each school-age non-graduated student reported, including who is/will provide the service, as well as evidence of when the services have/will be provided.
- The District ensure all the Alternate Education Program staff review the process of Student Learning Plan (SLP) development to ensure evidence of additional services provided/to be provided are identified and dated.
- The District ensure all the Alternate Education Program staff review the SLPs of students on an annual basis. These plans must contain objectives for the student, additional services to be provided to the student, progress made towards the student's goals, and specific transition plans.
- The District review the process for the development of IEPs for designated special needs students enrolled in Alternate Education Program schools ensuring the plans align with the special education guidelines.
- The District review the mechanisms used by all Alternate Education Program schools to record the provision of support services to students in order to track those services and to

verify that the service provision requirement of the Alternate Education Program Policy is being met.

- The District ensure the process of referral of students to the Alternate Education Programs is consistent and in accordance with a District designed screening process and procedures.
- The District investigate the current process of “drop-in” practices within Alternate Education Programs to ensure alignment with the educational offerings identified in the Alternate Education Program Policy with evidence to verify students receive support services designed to meet their individualized educational requirements including social or emotional supports that are not available through traditional schools.
- The District undertake a review of the operational processes of Tri-Cities Soar to determine whether this school meets the requirements of the Alternate Education School Program Policy.
- The District schools ensure that a plan for the delivery of Aboriginal Education programs/services are in evidence at the time of the Data Collection claim date and that only those students provided with Aboriginal Education support programs and/or services in accordance with Ministry of Education directives are reported for supplemental funding.
- There be the ability annually for parents and students (where applicable) to opt in or opt out of the Aboriginal Education program and/or services and accurate accounts of these responses are maintained.
- The District schools ensure the requirements for ELL supplementary programming and service provision to students, as set out in the Form 1701 Instructions and ELL Policy and Guidelines manual, are met before each student is reported for funding.
- The Alternate Education Program schools be required to undertake a Ministry sanctioned workshop and a return audit be scheduled to ensure the audit outcomes and recommendations in accordance with Ministry of Education directives are put into practice, including student service provision specific to the Alternate Education Program policy.

### **Auditors’ Comments**

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