



**Ministry of Education  
Resource Management Division**

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

**AUDIT REPORT**

**SCHOOL DISTRICT No. 83 (North Okanagan Shuswap)**

## **2018/19 K-12 REGULAR ENROLMENT AUDIT REPORT**

### **SCHOOL DISTRICT No. 83 (North Okanagan Shuswap)**

#### **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. 83 (North Okanagan Shuswap) reported a total of 6,353.4709 FTEs or 6,239 students, including 46 students for English Language Learners (ELL) and 1,152 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 return K-12 Regular Enrolment audit was conducted in School District No. 83 (North Okanagan Shuswap) during the week of April 1, 2019. The schools audited were:

- Salmon Arm Secondary School
- Salmon Arm Storefront (Alternate)
- Pleasant Valley Secondary School

The total enrolment reported by these schools on September 28, 2018 was 1,080.3125 FTEs, of which 274 student files were reviewed. The review was extended to include all reported students for analysis when school-wide issues were identified by the audit team.

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 April 1, 2019 with the Superintendent and each school's Principal, the District Principal-Inclusive Education, the Director of Instruction-Inclusive Education, the Secretary Treasurer, the District Principal-Career Education, the Principal-Indigenous Education, school clerical and one teacher from the Alternate Education Program 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 April 5, 2019 with the Superintendent and each school's Principal, the District Principal-Career Education, the Principal-Indigenous Education, school clerical and one 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
- School-Age Grade 10-12 Course Claims
- Alternate Education Programs
- Adult Student Claims
- English Language Learning Supplemental Claims
- Aboriginal Education Supplemental Claims
- Reciprocal Exchanges
- Post-Secondary Transition Programs with Post Secondary Institutions and Industry Association partners
- District Created Academies

Prior to the audit visit, the auditors undertook a verification of the school-assigned teachers' status with the Teacher Regulation Branch verifying that there was one non-certified teacher teaching in one of the schools audited.

### **Observations**

The auditors found that:

- 1.0625 school-age Grade 10-12 FTEs and 0.5000 non-graduated adult FTEs claimed for funding were enrolled in and attending fewer courses than reported at the Data Collection claim date.
- 3.1250 school-age Grade 10-12 FTEs were without evidence of attendance as 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).

- Based on the observations and recommendations regarding Alternate Education programming from the District's 2017/18 audit report: the school, with new administrators as at November 2018, had begun the process of addressing issues including the decision to generate an Individualized Educational Plan (IEP) for each student and the creation of a transparent and consistent intake process.
  - Remaining areas of consideration for alignment with the Alternate Education Program processes were:
    - Limited evidence of the individualized enhanced services based on each student's needs. The School uses a management system to document services for students, yet the support references reflected generalized comments which were alike for the majority of the students.
    - Services offered to students did not always correspond with IEP goals and objectives.
    - The IEPs for designated students were not consistent with the IEP requirements aligned with the [Ministerial Order](#) and the [Special Education Guidelines](#).
    - Students have limited access to the number of hours they can attend Salmon Arm Storefront which impedes their ability to complete their educational program towards graduation in a timely manner (identified as a transition goal for many of the students).
    - Specialized and enhanced service provision for students was inconsistently dated or not dated at all.
- 2.7500 school aged Grade 10-12 FTEs were claimed for Ministry Authorized Work Experience 12 (WEX). There was no verifiable evidence aligned with the required directives of the [Elective Work Experience Courses and Workplace Safety Policy](#), the [Work Experience Order M237/11](#), or the [Program Guide for Ministry-Authorized Work Experience Courses](#). Similar findings contrary to the Ministry directives were found to persist despite the observations and recommendations noted in the District's 2010/11 and 2017/18 K-12 Regular Enrolment audit reports.
  - At both secondary schools there were a number of students enrolled in WEX12 courses in which it was verified that there was no evidence of an educational program aligned with the Ministry directives for WEX12 claims. It was verified that the schools did not consistently follow the written direction set out by the District's Career Coordinator.
  - At Pleasant Valley Secondary there was no evidence that students reported as taking both WEX12A and WEX12B were enrolled in two separate and distinct educational options. The training plans did not show progression of duties in a specific job, nor evidence of differentiated duties within the same job placement, or evidence of a separate plan for use by the student and employer that articulated the skills and areas of knowledge to be developed in each of the work placements. It was verified that the teacher photocopied the plans from WEX12A to use for WEX12B with students continuing to only accumulate hours from the original WEX12A placement. The Form 1701 Instructions clarifies that: *"Schools must ensure when tracking hours related to the work study program segment of WEX 12A/B and WRK11A/B and WRK 12A/B that each of these four credit courses are only claimed once regardless of the number of reporting periods the student requires to complete the work placement component"*.
  - Signed documents were seldom dated; examples of the September 2018 WEX12 claims were for work assignments indicating placement began as far back as September 2017; most of the September 2018 claims identified students began a Moodle option in May

2018 of the previous school year with very few signed or dated agreements in evidence for those students on District sanctioned work placements early into the 2018/19 school year; there was evidence indicating student hours of work was recognised from the 2018 summer months with the auditors advised that most students “finished the course” in September or early October 2018. The 84 WEX12 courses scheduled in the second semester at the time of the April audit were without any or limited evidence of adherence with the WEX12 directives.

- There were significant challenges to verifying work placement hours and establishing dates when the WEX12 agreements were created. Little to none of the documentation was dated and work placement hours were tallied when the student had completed the work assignment with the teacher obtaining the information from the employer. In an effort to verify the claims, the audited schools were given an extensive amount of time to locate and present additional evidence to support the funded WEX12 claims.
- The District provides a “teacher observation form” for documenting worksite visits. There was evidence that this form (as well as other written records of staff visits/check-ins for students at work sites) were not consistently used. In several instances the site visits occurred after the student had completed the WEX12 course.
- At Pleasant Valley Secondary it was determined that many of the students reported as undertaking Independent Directed Studies (IDS) were provided with for credit educational options that met the definition in the [Graduation Program Order](#) (M302/04) and delivered demonstrable examples of individualized elective opportunities initiated by students towards graduation.
- 3.1250 school-age Grade 10-12 FTEs were reported as IDS which did 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.*
  - While it was identified that the purpose of these two drop-in sessions were options to assist with student behaviour management, there was no evidence of curriculum or course content for the two four-credit options reported for funding as elective courses towards graduation. The Principal confirmed that there was no specific course or plan but an option where students dropped in for behavioural assistance and self-regulation. It was verified that none of the students were designated with special needs nor provided with any educational program towards graduation in these sessions.
  - There was no evidence that the blocks reported as four-credit course options met the definition of a course in accordance with the Form 1701 Instructions, the [Student Credentials Ministerial Order MO 164/96](#) or the Graduation Program Order M302/04 which says: *"course" means an organized set of learning activities in a subject area that meet the learning outcomes set out in the applicable educational program guide listed in Ministerial Order 333/99, the Educational Program Guide Order, and includes a Board Authorized Course, a Ministry Authorized Course, and independent directed studies*".
- Overall the Aboriginal Education supplemental programs provided in the schools audited had comprehensive evidence of service to the students.

- Four students reported as receiving an Aboriginal Education Program and/or Service 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](#).
  - Three students were verified as not enrolled and/or attending as at the September claim date. It was confirmed that these non-attending students did not receive any supplemental program and/or support services.
  - One student was not of aboriginal ancestry nor was there evidence the student received any related supplemental services.
- 8.1250 school aged Grade 10-12 FTEs were funded for courses taught by a non-certified individual with no evidence of a Letter of Permission (LOP) or certification from the Teacher Regulation Branch (TRB). The individual was hired to provide a Hair Styling program of courses at Pleasant Valley Secondary.
  - The District was aware prior to September 3, 2018 that the certified instructor for these courses would not be returning due to illness. Students finished the first half of their Hair Styling program in the 2017/18 school year and the School chose to maintain the program for the 2018/19 school year which led the District staff to pursue hiring a non-certified individual who would require a Letter of Permission (LOP) from the Teacher Regulation Branch (TRB).
  - A required criminal record check was undertaken on October 2, 2018 with the individual hired to teach the Hair Styling program (a cohort of five different classes) to 14 students. Evidence verified that the placement was considered part time. While the School Act Section 19-Employee qualifications says: *“A board may employ a person who possesses qualifications approved by the board, but does not meet the requirements of subsection (1) if that person is (a) employed for 20 or fewer consecutive teaching days...the district staff decided to interpret the requirement as 40 half days. This time period was recognised by District staff to be a part-time placement. As there was no evidence of educational oversight by a TRB certified district staff member, the audit team were told the individual was supervised by the career educator and the school principal during the part-time placement. The District staff required the individual to apply for their LOP while working during the part-time placement.*
  - The audit team were advised that by December 5, 2018, District staff determined the individual would teach the entire program full time, without certification and without supervision by a TRB certified District staff member. The individual performed all of the duties of a teacher including writing report cards. The individual reported on the students, providing a final letter grade and anecdotal comments for the course, and did so not using their own name but under the name of the initial certified teacher who was away on sick leave.
  - The individual’s employment was terminated when they did not meet their obligation to apply for a LOP. The next semester the Hair Styling Program was cancelled.
  - In accordance with the *School Act* and as outlined in the [K-12 Funding-General Policy](#): *“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 individual employed full time to provide the funded educational option was not certified or provided with a LOP to teach the series of courses claimed for funding, no supervisory oversight was

undertaken by a TRB certified District staff member during the individual's full time placement, nor was the individual eligible to evaluate the educational program through student progress reports under their own name or, as was undertaken, using an educator's name who was away on leave.

- Another instance of non-certification was investigated. It was determined that the individual did begin the application process to the TRB in August 2018 but the process was delayed pending the submission by the individual of additional documentation required to complete the process. The certification process was finalized by the TRB in March 2019. While there was no follow up at the District end to the TRB and the individual had been without TRB certification since the start of the school year, it was recognised that the process was initiated prior to the start-up of classes for the 2018/19 school year and the delay was due to TRB procedural requirements.
- 0.6250 school aged Grade 10-12 FTEs were reported for the same career courses reported by two of the District's secondary schools. The Form 1701 Instructions state that "*Students are not allowed to take the same course at the same time whether in different schools or the same school*". The duplication of claims was identified when verifying the eligibility requirements of the career claims that the same courses had been reported by another district school.

### **Recommendations**

The auditors recommend that:

- Schools claim only those students who are enrolled and attending as at the Data Collection claim date.
- 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 8-12 claims.
- The secondary schools ensure the accuracy of the reported courses including verification that no duplicate claims are made.
- District school staff ensure that self-paced courses are only claimed as one course regardless of the number of reporting periods the student requires to complete the learning standards for the course, including WEX12 options.
- The District ensure schools refrain from incorrectly labelling drop-in sessions as IDS and in consultation with District staff, amend the current use of IDS course codes for options that do not align with the eligibility requirements.
- The District 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.
- The District ensure that all funded educational options leading to graduation are provided by an educator with a valid teaching certificate (or a valid letter of permission) and that all responsibilities are in accordance with the *School Act*, the K-12 Funding-General Policy, as well as the duties of teachers outlined in the [School Regulation](#).
- 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 prior to the claim dates and that a tracking process regarding educators' pending status be implemented.*

- The District staff ensure the following requirements are met when schools claim funding for the Ministry Authorized WEX12 courses:
  - students must have an in-school orientation;
  - there is a plan in place for use by student and employer articulating the skills and areas of knowledge to be developed during the work placement;
  - there must be a duly signed Work Experience Agreement Form;
  - there is evidence that students are at sites where WorkSafeBC coverage is in place;
  - school personnel monitor students in accordance with Board guidelines;
  - a District staff educator, with valid teaching certificate evaluates the performance of the students and assign final percentages.
- All secondary schools be required to adhere to the written directions set out by the District Career Coordinator and ensure those school assigned staff follow District's Work Experience Process.
- The District's secondary schools ensure that only eligible student FTEs are claimed for WEX12 and that the students are receiving an educational program and instructional component in accordance with all Ministry directives related to WEX12 including evidence of this to verify those claims.
- The District ensure student workhours undertaken prior to the start of WEX12 are not used for the work placement portion of the course.
- As identified in the District's 2011/12 and 2017/18 school year audit reports, the District staff ensure that all the required directives of the [Elective Work Experience Courses and Workplace Safety Policy](#), the [Work Experience Order M237/11](#), and the [Program Guide for Ministry-Authorized Work Experience Courses](#) are met.
  - the practice of offering WEX as an educational option to students once they have a job must still align with the WEX directives that:
    - paid hours used for work experience are only to be recognized as part of the educational option after the school has contacted the employer and a training plan has been developed;
    - these courses are not intended as 'instant credits' for students who have a part-time job.

To meet the eligibility requirements for the WEX12 course claims the following is required to align with the policy, legislative order and the program guide's Work Experience Standards including:

- evidence Board established guidelines are in place regarding conduct, supervision, evaluation and participation of students reported as taking funded WEX12 options;
- educators have established a plan for use by the student and employer that articulates the skills and areas of knowledge to be developed during the work placement;
- familiarizing the student with the responsibilities and expectations associated with participating in a work experience placement;
- monitoring the student during the placement;
- teaching the student about workplace safety before work placements begin;
- endeavouring to place the student in appropriate situations;

- all required parties sign a Work Experience Agreement Form before any work placement begins;
- reminding all employers of their responsibility to orient the student to workplace safety practices;
- visiting any new work site to meet the employer or supervisor;
- informing workplace sponsors about the intent of the work experience placement;
- evaluating the student using established criteria measuring student achievement in relation to the Prescribed Learning Outcomes/competencies/standards for the course;
- ensuring the workplace atmosphere is free of exploitation and harassment; and
- verification that paid work assignment(s) are covered by WorkSafeBC.

Once again, should District schools chose to disregard these directives, credit could be awarded to students for WEX12, if so determined by District educators, but in these instances would not be funding eligible.

- The District ensure students reported as receiving an Alternate Education School Program are in attendance at the claim date and are receiving the required service provision in accordance with the [Alternate Education School Program Policy](#).
- The District ensure that only those students provided with Aboriginal Education support programs and/or services in accordance with the [Form 1701 Data Collection Instructions](#) and the [K-12 Funding-Aboriginal Education Policy](#) are reported for supplemental funding.
- As it was verified that non-compliant issues still remain in secondary school practice and without initiative to undertake a Ministry sanctioned workshop, the District be scheduled for another return audit to ensure Ministry directives are being followed by all secondary schools.

### **Auditors' Comments**

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