



**Ministry of Education
Resource Management Division**

2018/19 Continuing Education Enrolment Audit

AUDIT REPORT

**SCHOOL DISTRICT No. 40
(Pearson Adult Learning Centre)**

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Background

The Ministry of Education conducts Continuing Education audits, in selected school districts, to verify enrolment reported on *Form 1701: Student Data Collection* (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.

Continuing Education centres provide adults who have not graduated from secondary school the option of obtaining a B.C. Adult Graduation Diploma or a regular Dogwood Diploma by taking courses offered through school districts, and effective September 1, 2008 boards that have passed motions may offer graduated adults specific courses tuition-free. In certain situations, school-age students may also enrol in Continuing Education courses.

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 58,810.2237 full-time equivalent (FTE) students. School District No.40 (Pearson Adult Learning Centre) reported 694 Continuing Education students or 218.1250 FTEs for the September 2018 reporting period.

Purpose

The purpose of the Continuing Education 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 Continuing Education enrolment audit was conducted in School District No. 40 New Westminster's Pearson Adult Learning Centre the week of March 11, 2019. The total enrolment reported at September 28, 2019 was 218.1250 FTEs, of which 225 student files were reviewed. While the audit team identified school-wide issues, due to the inability to resolve a number of clarifications, there was insufficient time to review claims outside the sample.

An entry meeting was held with the Assistant Superintendent and the Continuing Education 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, and the Principal provided information about the programs offered by the Continuing Education Centre. The administrators and the audit team discussed the procedures that would be followed to undertake the audit.

The auditors worked out of the Pearson Adult Learning Centre. The audit team followed a process, which gave District 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

Centre's staff. To minimize the likelihood of missing relevant data, the staff was also given the opportunity to seek further information on all student claims when there was a discrepancy in the FTE calculation. Throughout the audit the Principal was kept apprised of any issues.

An exit meeting was held with the Continuing Education Centre's Principal as well as with the two Assistant Superintendents and the Secretary Treasurer. 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 found to be certified by the Teacher Regulation Branch.

Description of the Program

The New Westminster School District's continuing education program is offered at one site and is referred to as the Pearson Adult Learning Centre (PALC). The Centre has been in operation for over 30 years. The Centre primarily supports the educational needs of adult learners including new immigrants. The students are attending for a number of reasons including: education upgrades, completion towards high school graduation, or taking English Language Learning courses.

The Centre is open year round in order to accommodate the schedules of adult learners. Grade 11 and 12 courses are offered as self-paced or classroom based courses. Moving forward the District advised they will be changing their course offerings to only a classroom based model as a mechanism to improve completion rates.

Currently, the majority of students are enrolled in Literacy Foundation English and Math courses. These students generally take multiple courses at the same time. The Foundation English courses are classroom based. With the exception of Foundation Math 7, the Foundation Math courses are self-paced and instruction is offered in a drop-in lab or through tutorials, offered three times a week. Both of these instructional choices are optional for students and attendance is not taken. The school year encompasses three terms (Fall, Winter and Summer) although enrolment for new courses occurs weekly throughout the year.

Observations

The auditors found that:

- 0.6250 non-graduated and 0.2500 graduated adult FTEs were claimed for courses in September where there was no evidence of the student taking the number of courses reported for funding.
- 4.7500 non-graduated adult FTEs reported for funding were enrolled in self-paced courses verified as duplicated claims having been undertaken in previous data collection periods. The Form 1701 Instructions states that: "*Courses encompass only one organized set of learning outcomes/standards. While completion of the course's learning outcomes/standards may be over a number of registration periods, only one course is undertaken and therefore eligible for only one funding claim*". The completion of each of the course's learning outcomes was ongoing yet only taken once by the students.

- 4.1250 non-graduated adult FTEs claimed for funding did not meet the attendance requirement for eligible courses. The [Adult Funding Policy](#) states that “*Eligible courses will be funded if they are documented on a Course Enrolment Form and if the student taking the course(s) meets the attendance requirements*”. “Attendance is defined to be over one registration period AND either 1) a minimum of 10 hours of instruction in a classroom or learning centre for each course or a demonstrated completion of 10% of the course requirements. The auditors noted a significant number of students in the sample were enrolled in courses had no record of completed work.
- Due to the prevalence of ineligible claims identified at the time of the audit, the District’s Director of Instruction undertook a systemic review of all February claims. This investigation yielded evidence of courses which were:
 - claimed in error; and
 - eligible claims reported in February that did not meet the attendance requirement until after the February claim date.

The District resolved to work with their adult education staff and teachers to make improvements to their policy, process and practices to ensure the procedures align with Ministry policies and directives and provide educational programming that supports student success.

- 22.3750 non-graduated adult FTEs were verified by the District as being ineligible claims for the February 2019 claim period.
- There was evidence of a number of students (the majority of which were undertaking their educational service during the summer months) with no completed work and met only the minimum ten hours of attendance.
- Classroom records and the student information system records were in some instances not aligned and actual instruction time was difficult to corroborate.
- There were a number of discrepancies between final course marks and classroom progress records, including evidence of a student completing one assignment reflective of 10% of the course’s learning standards who received a final mark of 40% while another student completed eight modules of the course with an average of 87% and received a final mark of 40%. The Centre had a practice of awarding 40% as a final mark if the student had not completed the course, regardless of how much work was undertaken nor at what achievement level. It was verified that final marks on student transcripts did not reflect actual student achievement.
- The District and Centre staff have developed a robust residency policy specifically addressing the many challenges of verifying B.C. residency for a population of newly arrived individuals from outside Canada.
- The District does not have a Board Withdrawal policy as required in the [Provincial Letter Grades Order](#). There was no evidence students were assigned a Withdrawal (“W”) grade when courses were dropped prior to completion. The Centre assigns a Fail (“F”) grade, but auditors found no evidence of an Incomplete (“I”) grade having been previously assigned as required in the Provincial Letter Grades Order.
- A review of student transcripts indicated that some students were assigned and claimed for the same course multiple times (including up to 14 times over a period of years).
- There was little evidence of staff follow up when students stopped attending classes.
- Foundations Math 1 through 6 were offered as self-paced courses in a tutorial/lab setting. Attendance is not taken, yet the student was shown on school records as having been present for four classes (10 hours) based on the completion of one unit of course work. Recording

in-class attendance must be based on evidence of actual attendance. Course progress/achievement is a separate requirement and is to be recorded as part of a teacher's record of marks.

- Students were not assigned to structured classes. Students had the option of dropping into the math lab and/or the option of attending math tutorials which are offered three times a week if they require assistance or instruction. There was no requirement for students to attend either the lab or the tutorials. During the verification process aligned with the Adult Funding Policy's attendance requirement, the auditors had no evidence to verify attendance, as attendance was not taken. As a result, in an attempt to verify claims, reviews were based on completion of work to determine if the FTE claim met the attendance requirement (completion of 10% of the course or 10 hours of attendance - the 10/10 rule). In a number of instances, the evidence of course work undertaken was also unavailable. The evidence to meet the attendance requirement issue was systemic but due to time constraints attempting to verify the sampled FTEs, there was no ability to extend reviews outside the sample.
- The audit team had many unanswered questions with respect to how students were placed in the various levels of Foundation Math courses and to a lesser degree Foundation English options. There were many instances of students repeating the same course over a dozen times. It was verified that a 62 year old Canadian born student whose first language was English was assigned to Foundations English 1. There were also instances of students after successfully completing Foundations English 2 with a mark of 90% then being placed in Foundation English 1.
- The registration process did not appear to consider student course history and achievement in a number of instances. One teacher stated that during the enrolment process teachers would not access the student data system to check previous records, but rather treated each student as a new enrolment.

Recommendations

The auditors recommend that:

- The District follow through with their commitment to work with their adult education staff and teachers to improve their current practices ensuring all procedures align with Ministry policies and directives to provide educational programming that supports student success.
- The District's Continuing Education Centre only report courses for funding where the student claim meets the attendance requirements.
- The District's Continuing Education Centre 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.
- The District's Continuing Education Centre ensure that students claimed on Form 1701 are enrolled and attending the courses in accordance with Ministry requirements.
- Attendance records reflect only actual attendance under the instructional lead of a certified teacher.
- Only attendance records taken by the student's designated teacher are to be reflected in the student information system.
- Only actual student achievement, as determined by a certified teacher, is to be reflected on student transcripts.
- The District develop a Withdrawal Policy in accordance with in the Provincial Letter Grades Order.

- Before assigning a Fail letter grade of “F” a student must have received an Incomplete “I” as per the Provincial Letter Grades Order.
- The Centre explore means of ensuring non-attending students are encouraged to re-engage in their learning of the funded educational options.
- Literacy Math Foundations courses not offered in a structured class must not have attendance records stating attendance is based on progress.
- The Centre review its assessment strategies for determining placement of students in the Foundation English and Math courses.
- The Centre amend registration practices to ensure students are appropriately placed in relevant courses.
- A return audit be scheduled to ensure the recommendations in accordance with Ministry directives are put into practice.

Auditors’ Comments

The auditors wish to express their appreciation to the District and program staff for their help throughout the audit process.