



**Ministry of Education  
Resource Management Division**

**2011/12 K-12 Regular Enrolment Audit**

**AUDIT REPORT**

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

## **2011/12 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 Resource Management Division 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 2011/12 school year, boards of education reported a total of 536,597.4754 FTEs in Kindergarten through Grade 12. School District No.83 (North Okanagan-Shuswap) reported a total of 6,556.6251 FTEs or 6,519 students, including 114 students for English Language Learners (ELL) and 944 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**

For each of the schools audited, a segment of the students reported in the 2011/12 school year was selected for review. An entry meeting was held with the Superintendent and each school's Principal 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. In each school the audit team gave administrators and program staff opportunities to locate and present additional evidence when such evidence was not available in the documentation presented by the school. Exit meetings were held with each Principal and the Superintendent. At each exit meeting the auditors presented their preliminary results and clarified any outstanding issues.

The audit included the enrolment reported in the 2011/12 school year. The areas audited were:

- September 30<sup>th</sup> enrolment and attendance for all grade levels

- Ordinarily Resident
- School-Age Grade 10-12 Course Claims
- Alternate Education Programs
- Adult Student Claims
- English Language Learners Supplemental Claims
- Aboriginal Education Supplemental Claims
- Reciprocal Exchanges
- Career and Dual-credit Transition Programs with Post Secondary Institutions and Industry Association partners

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:

- 2.5000 school-age Grade 10-12 FTEs claimed for funding were enrolled in and attending fewer courses than reported at September 30, 2011.
- 0.1250 adult FTEs claimed for funding were enrolled in and attending fewer courses than reported at September 30, 2011.
- 20.0000 school-age Grade 10-12 FTEs were claimed for a course which the school did not intend to offer. According to school personnel, the course was a place-holder for students who had not signed up for a full course load. School personnel entered the course on individual September 30, 2011 student timetables. The school staff member listed as the teacher for the course was not trained nor experienced in the subject matter and stated that he did not teach such a class.
- 0.3750 school-age Grade 10-12 FTEs reported as support blocks were verified to be ineligible study blocks. It was determined that this was a drop-in class and attendance was not required. It was classified as a block during which the student could get assistance or support. The Form 1701 Instructions state...*“Each support block is to be considered equivalent to the 120 hours of instruction of a regular 4-credit course, instructional service is provided and documented by a teacher, regular attendance is expected, and does not include independent study time, drop-in sessions, , voluntary study halls, tutorial sessions or time spent on courses at another school.”*
- 22.5000 school-age Grade 10-12 FTEs were reported for XSIEP block claims where the student did not have an IEP, nor designation as a special needs student. These sessions had the attributes of a drop-in study block. In accordance with the Form 1701 Instructions XSIEP codes were created as *“a set of generic non-credit codes that meet the Ministry funding requirements as accepted activities for identified special needs students on an IEP”*.
- 13.0000 school-age FTEs claimed through the Alternate School did not have documentation to meet the requirements of the Alternate Education School Program Policy. The policy states...*“Each Alternate Education Program will have: 1) An intake process to facilitate district referrals or self-referral; 2) A regularly reviewed learning plan for each student whether it be an official Individual Education Plan (IEP) or a Student Learning Plan created by the school 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”.*

- 2.1250 school-age Grade 10-12 FTEs were claimed for ineligible student exchanges. Two non-resident students participating in a Rotary exchange were identified as reciprocal with resident students where one resident student graduated in June 2011 and the second resident student was unable to take part in the exchange. According to school district personnel a resident student from a neighbouring district acted as the reciprocal exchange student. Per the Form 1701 Instructions the exchange is to be undertaken within the same board of education and further states that *“Boards receive funding only for the ordinarily resident student. During a one in/one out reciprocal and equal exchange, the non-resident student acts as a placeholder for the funded local student during that student’s absence. Claiming funding for a non-resident student after the resident student has graduated (and no longer enrolled with the Board and therefore no longer eligible for funding) does not meet the reporting requirements.”*
- 2.0000 school-age Grade 10-12 FTEs were claimed for non-resident international students. In accordance with Form 1701 Instructions: Out-of-Province/International students are not eligible for provincial funding.
- 0.5000 school-age Grade 10-12 FTEs were reported for Secondary Apprenticeship Program course claims without evidence as required in accordance with the Program Guide for Secondary School Apprenticeship. There was no evidence these students: were registered as youth apprentices by the Industry Training Authority (ITA); had completed ITA registration forms; had sponsors recognized by the ITA; or, had established training plans.
- 66.7500 adult FTEs 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 OR 2) meets the active policy for distributed learning”*.
- 5.6250 adult FTEs were claimed for self-paced courses. Documentation identified the students began the course in the 2009/10 or 2010/11 school year and were reported for further funding for the continuation of their learning in the same self-paced course for the 2011/12 school year. Self-directed courses have an open-ended timeline but encompass only one organized set of learning outcomes. The student proceeds through the course(s) at their own pace as they work towards meeting all the learning outcomes. The completion of each of the course’s learning outcomes was ongoing but were only undertaken once by the student.
- 24.1250 adult FTEs were claimed for graduated adults who were taking ineligible courses. In accordance with the Adult Funding Policy, *“For **graduated adult students**, eligible courses include only courses listed in Appendix 1 of the Education Guarantee Information page”*.
- 0.5000 adult FTEs were claimed for Work Experience. There was no verifiable documentation reflecting 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.
- 4.5000 adult FTEs reported as Work Experience courses were granted course credit, or were awarded credit through a prior learning assessment, based on their past or current

employment. There was no verifiable documentation reflecting the required Ministry directives for Work Experience nor was an educational session reflective of a four-credit course provided. In addition to the above requirements for Work Experience, the Form 1701 Instructions state that prior learning assessment credit granting are not secondary courses and are not to be reported through Form 1701.

- 0.1250 adult FTEs were claimed for Planning 12 when it was verified the student had previously completed Planning 10. Adults in the Adult Dogwood program receive Grade 12 credit recognition based on the previous completion of Planning 10 – not a duplicated funding claim. Per the Handbook of Procedures for the Graduation Program Manual P.71 *“if schools decide to re-report [To the Ministry’s Student Certification Branch] a PLAN 10 course with the PLAN 12 Adult Grad course code, they must use the completion date of the PLAN 10 course.”*
- 1.7500 adult FTEs were reporting for XSIEP blocks. As previously noted, these set of generic non-credit codes are specifically for identified special needs students on an IEP. None of these claims were representative of students over the age of 19 who were reported in the previous school year as having special needs working towards the goals set out in their IEP. Also, in accordance with Form 1701 Instructions, in consideration of support block claims – adults are ineligible for support block claims.
- 7.00 students claimed for ELL supplemental funding did not have documentation to demonstrate requirements related to the provision of services for each student were being met as required in the ELL/ESL Policy and Guidelines manual and, as identified in the Form 1701 Instructions, there must be evidence of support provided by September 30<sup>th</sup>. There was no evidence of additional services or support provided. For two of the student claims, services were not provided the request of the parents.
- 29 students claimed for Aboriginal Education supplemental funding did not have documentation to meet the evidence requirements as required in the Form 1701 Instructions. The Form 1701 Instructions state that for a student to be reported as receiving an Aboriginal Education Program and/or Services, there must be: *“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, *“A plan for the delivery of these Aboriginal Education Programs and/or Services must be in evidence at the time of the September 30, 2011 claim. Aboriginal Education Funds...must not be used for the delivery of BC First Nations Studies 12, English 12 First Peoples or the delivery of any other courses leading to graduation. Cultural events may form part of an Aboriginal Education program but do not constitute a program in and of themselves.”*
  - 24 students had no evidence of receiving a program/service that was in addition to any other programs and services to which they are entitled.
  - 5 students had no evidence of parental consultation and no evidence of receiving a program/service that was in addition to any other programs and services to which they are entitled.

- While it is a requirement for schools reporting students for Aboriginal Education supplemental claims that there be a *“A plan for the delivery of these Aboriginal Education Programs and/or Services must be in evidence at the time of the September 30, 2011 claim”*, three of the Storefront Alternate Program schools did not have such a plan.
  - The auditors noted that a number of the Aboriginal students not receiving supplemental service were considered students with strong academic backgrounds who did not require or want services and/or support, yet were reported for supplemental funding.
  - Both secondary schools had a plan for the delivery of their Aboriginal Education Programs.
- It was noted that a number of students reported with special designations in the Alternate Program schools did not have current IEPs.
  - Student Learning Plans for alternate program students tended to focus mainly on the student’s education plan for graduation. Specialized services provided by the schools are not noted on any of the student plans yet are an integral part of the program offered by these schools.
  - Salmon Arm Storefront and Sicamous Storefront are currently reported as School Facilities Type 3 but do not meet the requirements of an alternate school as defined in the Alternate School Program Funding Policy or in accordance with the Form 1601 Instructions. The District must either bring the school into compliance with the criteria required for all alternate schools or take steps to remove the School Facility Type 3 code from this educational facility when reported in subsequent school years. The Form 1601 Instructions define Alternate Education schools – Type 3 facilities as those that: *“focus on the educational, social and emotional issues for those students whose needs are not being met in a traditional school program. An alternate education school provides its support through differentiated instruction, program delivery and enhanced counselling services based on student need. In order to be classified as a Alternate school all of the requirements in the Alternate Education School Policy must be met.”*
  - A significant number of documents provided as evidence were not dated.
  - The District had a written policy on “Student Residency Requirements”. It notes that the *School Act* *“states that a student is resident in BC if the student and the guardian of the student are normally resident of BC”*. However, the District’s policy also states that *“In some instances, parents from other Canadian jurisdictions wish to have their son/daughter enrol in the North Okanagan-Shuswap School District. If the Canadian parent, by letter temporarily assigns guardianship to a relative who is resident within the district, then the student will be given permission to enrol.”* The District’s policy statement as currently written is misleading. Districts can enrol but cannot claim non-resident students for provincial funding. In accordance with the *School Act* and as stated in the K-12 Funding General Policy: *“To be eligible for provincial funding, Boards of Education must ensure that students are: ordinarily resident in BC (and where applicable for school-age students) with their parent/legal guardian”*. Students living with relatives in British Columbia are not ordinarily resident and therefore ineligible for provincial funding.

## **Recommendations**

The auditors recommend that:

- The District and the schools ensure there is documentation of all students’ annual timetables as at September 30<sup>th</sup> to verify the Fall Data Collection funding claims, and that all courses

reported for funding are on each student's annual timetable as at September 30<sup>th</sup>. As noted in the Form 1701 Instructions, "*The Ministry strongly advises schools to retain student attendance and participation documentation for each reporting claim to facilitate in the resolution of duplicate enrolment and to assist in the enrolment audit process.*"

- Schools claim only those school-age students who are enrolled and attending as at September 30<sup>th</sup>.
- For Grade 10-12 school-age students, schools report only those eligible courses that are scheduled on each student's timetable as at September 30<sup>th</sup>, including evidence to verify the eligible Grade 10-12 funded courses.
- Schools ensure that self-paced/self-directed courses are only claimed as one course regardless of the number of reporting periods the student requires to complete the learning outcomes for the course.
- All schools reporting support blocks ensure that only eligible support blocks are claimed for course funding; and, when reporting support blocks in a student's plan of study the combined number of courses and support blocks cannot exceed eight, as set out in the Form 1701 Instructions.
- The District ensure that all funded support block claims meet the eligibility for funding criteria and are coded appropriately as support blocks when reported.
- Only eligible designated special needs students with an IEP are to be reported for funded XSIEP blocks.
- The District and the Alternate School(s) ensure there is documented evidence for each non-graduated school-aged student that meets all the requirements of the Alternate Education School Program Policy, including evidence of additional services required for the students, and ensuring the stated intake process is met and documented for each of the school-age students.
- The District ensure all schools offering Exchange Programs adhere to the directives and reporting requirements for "Exchange Students" found in the Form 1701 Instructions and the Eligibility of Students for Operating Grant Funding Policy when claiming students for an exchange program including the retention of verification documentation that clearly identifies when each of the eligible resident student and non-resident student's reciprocal exchange from the same board for the same length of time is to take place. Reporting both resident and non-resident student during the same funding period – and/or – reporting a non-resident student for funding without confirmation of the enrolled eligible resident student's reciprocal absence from the District does not meet the requirement that "*Boards receive funding for the ordinarily resident student*".
- The District ensure only eligible 'ordinarily resident' students are claimed for funding. International and Out of Province individuals are non-resident, ineligible for a provincially funded education, and are not to be claimed for funding.
- The District must amend its policy and processes on Student Residency Requirements and align their policy with Section 1 and Section 82 of the *School Act* as well as the directives set forth in the Eligibility of Students for Operating Grant Funding Policy which defines "guardian of the person" and contains clear identifiers that do not include temporary guardianship. The District's policy must clarify that non-resident students with a relative who has been assigned temporary guardianship do have the ability to enrol but are not eligible for a provincially funded education. The statement as currently written suggests funding eligibility for non-resident students. Assignment of temporary guardianship

contravenes the requirements for provincial funding eligibility. The district must ensure that all student residency requirements are in accordance with stated directives for ensuring students are ordinarily resident in B.C. and in the case of school-age students with their legal guardian to be eligible for a provincially funded education.

- The District ensure that only eligible student FTEs are claimed for the funding of Work Experience and that the students are receiving an educational program and instructional component in accordance with all Ministry directives related to Work Experience including evidence of this to verify those claims.
- The District ensure all schools offering dual credit or pre-employment program options through a post-secondary institution or technical training provider, as an educational option for students, are aware of and adhering to the requirements stated in the Recognition of Post-Secondary Transition Programs for Funding Purposes policy.
- The secondary schools ensure all established requirements and guidelines are followed before claiming students for career programs including Secondary School Apprenticeship courses.
- Adult students only be claimed for funding when the requirements as outlined in the Adult Funding Policy are met, including evidence to meet the attendance definition.
- The District ensure that all schools enrolling adult students are aware of and adhering to the Adult Funding Policy, including the course claim eligibility for Graduated Adults.
- The District ensure that the requirements for supplementary ELL funding as set out in the Form 1701 Instructions and ELL Policy and Guidelines manual are met before each student is reported for this supplemental funding.
- All schools ensure there is documented evidence demonstrating additional programs and/or services are provided to each of the students claimed for ELL supplemental funding and that these support services are in evidence at the time of the September 30<sup>th</sup> claim.
- The District ensure that each of the students claimed for Aboriginal Education supplemental funding are provided services that are in addition to any other programs and services to which the student is eligible and provide a continuum of substantive learning experiences and/or support services throughout the school year.
- All schools ensure there is documented evidence demonstrating that additional programs and/or services have been provided to each of the students claimed for Aboriginal Education supplemental funding.
- All schools ensure that only students who have self-identified as being of Aboriginal Ancestry as at September 30<sup>th</sup>, and participate in the Aboriginal Education programs/services are reported for funding.
- The District ensure that all schools are aware of and adhering to the supplemental funding reporting requirements outlined in the Form 1701 Instructions.
- The District ensure that student timetables are completed by the student, with parent and counselling support, and that there are acceptable practices in place when courses are added or dropped.
- The District review their adult education programs to ensure courses are being offered in accordance with the Adult Funding Policy.
- The District ensure that all courses offered meet the standards within the Student Credentials Ministerial Order.
- The District review the intake process for school-age students in Alternate Education Program schools to provide more specificity and consistency in the student referral process,

including establishing procedures for self-referrals, school-based team referrals, referrals from other agencies, referrals from administration or any other group or person involved.

- The District and the Alternate Education Program schools review the goals set for school-age students in Alternate Programs to ensure that, in addition to educational goals, there are goals related to attendance, behaviour and social needs.
- The District be considered for a return K-12 Regular Enrolment audit as well as an audit of the District's adult claims and special education supplemental claims.

### **Auditors' Comments**

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