



**Ministry of Education  
Resource Management Division**

**2012/13 Continuing Education Enrolment Audit**

**AUDIT REPORT**

**SCHOOL DISTRICT No. 91 (Nechako Lakes)**

## **2012/13 CONTINUING EDUCATION ENROLMENT AUDIT REPORT SCHOOL DISTRICT No. 91 (Nechako Lakes)**

### **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 Continuing Education 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.

Continuing Education centres provide adults who have not graduated from secondary school the option of obtaining a BC 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 2012/13 school year, boards of education reported a total of 7,144.2662 full-time equivalent (FTE) students. School District No.91 (Nechako Lakes) reported 368 Continuing Education students or 97.6250 FTEs for the September and February reporting periods.

### **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. 91 (Nechako Lakes) the week of April 22, 2013.

An entry meeting was held with the Superintendent, two Directors of Instruction, and the Secretary Treasurer 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 information about the programs offered by the Continuing Education Department was provided. The administrators and the audit team discussed the procedures that would be followed to undertake the audit.

The auditors worked out of three sites which included two Continuing Education Centres (located in Fort St. James and Burns Lake) and the Board Office in Vanderhoof. The audit team followed a process which gave District staff the opportunity to locate and present additional evidence when the team found that such evidence was not available in the documentation presented by the school. To minimize the likelihood of missing relevant data, the staff were 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 Director of Instruction, responsible for overseeing the Continuing Education Program, was kept apprised of any issues.

An exit meeting was held with two Directors of Instruction, the Secretary Treasurer, the Regional Director of the College of New Caledonia, and a teacher from the Lakes Learning Centre in Burns Lake (housed at the College of New Caledonia). At the exit 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 Programs**

The description of the Continuing Education Program is based on an interview with the Director of Instruction who oversees the District's Continuing Education Program. The Director of Instruction stated that as a result of the 2011/12 K-12 Regular Enrolment audit findings, the District is transitioning from Alternate Programs offered through the local high schools to one District Continuing Education Program.

In this interview on April 23, 2013, with the Lead Auditor, the Director of Instruction indicated that the 2012/13 school year was a transition year. He stated that although Continuing Education is a District program, during the 2012/13 school year, the newly formed Continuing Education Centres are still supervised by the administration of the secondary schools. The four sites are Riverview Learning Centre (Vanderhoof), Fort Centre for Alternate Education (Fort St. James), Fraser Lakes Continuing Education (Fraser Lakes) and Lakes Learning Centre (Burns Lake).

The Director of Instruction stated that the basis of the development of the Continuing Education Program for the District are the Ministry's Audit Criteria for Continuing Education as well as the educational needs of the population in School District No.91 (Nechako Lakes). A further point was made that the focus of the 2012/13 school year is to develop consistency in all the Continuing Education Centres for the overall Program related to registration processes, course overviews, and assessment strategies.

### **Observations**

The auditors found that:

- 1.2500 adult FTEs (0.1250 non-graduate reported in September; 0.8750 non-graduate reported in February and 0.2500 graduate reported in February) were claimed for courses where there was no evidence of the student taking the number of courses claimed for funding.

It was verified that there were instances where students had been enrolled for a course but never attended and/or there was no evidence of any student work.

- 2.0000 FTEs (0.2500 school-age reported in February, 0.5000 non-graduate adults reported in September and 1.2500 non-graduate adults reported in February) claimed for Work Experience did not meet the Work Experience requirements. Form 1701 Instructions (P.13) state that “*Work Experience 12A and 12B claims must meet the directives of the Elective Work Experience Courses and Workplace Safety Policy, the Work Experience Order MO237/11 and in accordance with the Program Guide for Ministry-Authorized Work Experience Courses.*”. In accordance with the Elective Work Experience Courses and Work Place Safety Policy: “*In order to be reported as a Ministry-authorized work experience course, the work experience must be supported and monitored by the school and **consist of authentic workplace experiences**...An educator with a valid teaching certificate must **evaluate** all work experience courses and assign a percentage...evaluation should be based on clear criteria and should include a variety of assessment strategies*”. And in accordance with 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*”. There was no evidence school personnel had monitored students in accordance with board guidelines. There was no evidence that after the completion of the work study program portion of WEX that a District educator (with valid teaching certificate) evaluated the work experience course and assigned a percentage.

It was verified that there were instances where Work Experience courses were claimed, based on student’s past or current employment. The Work Experience Order (MO237/11) states that “*a board may **recognize a student’s current or past paid employment** as Work Experience, provided that **as part of Graduation Transitions**, the student satisfies the board that the employment provides or provided for coverage for student under the Workers Compensation Act as confirmed in writing by the student’s employer.*”

Also in accordance with the Program Guide (P.8) – specific to paid work experience, requirements include: “*In those cases where paid employment for credit for Work Experience 12A or Work Experience 12B may be in a student’s best interests:*

- ✓ *the paid employment must coincide with a student’s Focus Area,*
  - ✓ *the school must contact the employer to establish a training plan and evaluation criteria*
  - ✓ *the training plan should include such information as hours to be worked, duties or tasks to be performed, employability skills to be practised, and workplace-specific skills to be developed*
  - ✓ *the paid hours to be used for work experience may only begin after the school has contacted the employer and a training plan has been developed.*”
- 0.1250 graduated adult FTEs was reported in February for taking a self-paced course previously claimed for funding. It was verified that the student began the course back in 2003, withdrew in June 2012 then restarted in September 2012. The student log stated “continuing on with English 12”. The course was divided into nine units with the student undertaking unit seven this school year. Self-paced courses have an open-ended timeline but encompass one organized set of learning outcomes. The student proceeds through the course at their own pace as they work towards meeting all the learning outcomes. While the completion of the course’s learning outcomes may have been over a number of terms only one course was undertaken.

- 0.2500 non-graduated adult FTEs were claimed in February for courses where the student did not meet the attendance/active requirements. The February Form 1701 Instructions (P.14) state: *“Students who have not met the attendance requirements for any course between September 29, 2012 and February 15, 2012 are not to be included in the CE February 1701 file.”*
- 4.8750 non-graduated adult FTEs were claimed in February for post-secondary transition courses at the College of New Caledonia. The February Form 1701 Instructions (P.12) and the Recognition of Post-Secondary Transition Programs for Funding Purposes policy both state that post-secondary courses are recognized for funding purposes if they are part of the school-age students’ planned program of study leading to graduation. Adults are ineligible. It was also verified that these students were charged a tuition fee and claimed for funding. In accordance with the Adult Funding Policy, *“Adults may be charged fees for courses that are not eligible courses”*; these ineligible courses are not to be claimed for additional provincial funding.
- 0.3750 school age FTE were claimed in February for funding of post-secondary courses where the student paid tuition. The Recognition of Post-Secondary Transition Programs for Funding Purposes Policy states that *“The school district pays any tuition costs for the post-secondary courses reported for funding.”* Additionally, there was no evidence to meet the K-12 Funding-General Policy requirement that to be eligible for provincial funding, the board 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.
- 0.3750 school age FTEs were claimed in February for a student who was enrolled in the District’s Alternate Education Program School as well as in the Continuing Education Program. The Form 1701 Instructions (P.3 and P.14) state that *“School-aged students in grades 10-12 or SU in Alternate programs may **only be reported in one school within a Board** and only by one Board or Authority unless they are enrolled in a Grade 10-12 Distributed Learning Course.”* *“School-aged students in Grades 10-12 or SU enrolled in a Continuing Education School may be reported in more than one school, except if enrolled in an Alternate school... operated by a Board”*.
- The Lakes Learning Centre (Burns Lake) is housed in the College of New Caledonia. The District has an agreement with the College to provide instructional services for up to 140 adult FTEs and ten District approved non-adult FTEs. The agreement identifies that the *“College will provide educational services as required by the District set out in provincial curriculum, the School Act, regulations and audit rules.”* The agreement also states *“The College is an independent contractor and is not the servant employee or agent of the District.”* The agreement identifies that the College will maintain appropriate records as required by the Ministry Education and the District for student enrolment, attendance, course progress and completion, providing such records to the District upon request. The College’s employee, Scott Zayac, identified himself as having a Principal’s role at the Centre, clarifying that he does not teach the Continuing Education courses but has an active role in overall program direction and oversees curriculum development at the Centre.
- Prior to the audit one of the evidence requirements for the District was the provision of course plans. None were provided until late in the audit process and one Centre’s teacher did not know they were required. The Distributed Learning Active Policy states, *“A clear course plan must be on file for each course. This course plan must link to the course's learning outcomes, performance standards, required resources and assessment strategies. This course*

*plan is the evidence supporting the requirement that assigned work is meeting the learning outcomes”.*

## **Recommendations**

The auditors recommend that:

- The District’s Continuing Education Centre ensure that students claimed on Form 1701 are enrolled and attending the courses in accordance with Ministry requirements.
- The District ensure student FTEs claimed for funding, including Work Experience, are receiving an educational program and instructional component in accordance with Ministry directives, including the establishment of required District guidelines, and that there is evidence to verify those claims.
- The District ensure student arranged work experience where the board chooses to recognize a student’s current or past paid employment as Work Experience is specific to the portion of the Graduation Transitions 30 hour requirement for those student taking the BC Graduation Program per the directives of Section 5 of the Work Experience Order and not a mechanism to claim funding for WEX12A and WEX12B.
- 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 outcomes for the course.
- The District’s Continuing Education Centre only claim for courses where the student claim meets the attendance/active requirements.
- The District follow the directives of the Recognition of Post Secondary Transition Programs for Funding Purposes Policy (Ref. Form 1701 Instructions, P. 12) which identifies that Post-secondary courses are only eligible for school-age students. Adults are not eligible for Post-Secondary options; school-age students are not charged tuition fees for District offered educational options that are claimed for funding; and, no claims for funding are made when adult students are charged tuition for non-fundable/ineligible courses.
- The District and the Continuing Centre staff ensure only eligible courses provided by the Continuing Education Centre are reported for funding.
- The District’s Continuing Education Centre refrain from reporting those non-graduated school age students enrolled in the District’s Alternate program school(s).
- As the District’s Continuing Education Centre uses DL Active as their determinate for attendance, all Continuing Education staff must be aware of the requirement to retain course plans that meet the DL Active Policy’s definition, and that the District ensure there are clear course plans for all subjects taught through the Continuing Education Centre(s).
- The District must review their agreement and the provision of instructional services provided by the College of New Caledonia to ensure any provincial funding claims related to these instructional services are in accordance with funding claim eligibility. Specifically, the ineligibility of funding claims through the District’s Continuing Education Centre for adults taking post-secondary delivered courses. The collaboration with post-secondary institutions is to provide transition programs that are educational options which combine secondary and post-secondary courses leading to Grade 12 graduation for school-age students only. Further, as stated in the Recognition of Post-Secondary Transition Programs for Funding Purposes Policy *“The school district pays any tuition costs for the post-secondary courses reported for funding”*.

- Based on the “Adult Education Delivery & Funding Arrangement Agreement” the District currently has with the College of New Caledonia and the findings specific to eligible student claims where tuition was charged, the District’s Continuing Education Program and all related sites be scheduled for a return audit to ensure all aspects of the provision of adult education and post-secondary transition claims reported for provincial funding are met.

**Auditors’ Comments**

The auditors wish to express their appreciation to the District and program staff.