



**Ministry of Education
Knowledge Management & Accountability Division**

2014/15 Distributed Learning Enrolment Audit

AUDIT REPORT

**PATHWAYS ACADEMY
(057 96841)**

2014/15 DISTRIBUTED LEARNING ENROLMENT AUDIT REPORT
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Background

Distributed Learning (DL) programs and courses are alternatives to regular classroom-based instruction for students in Kindergarten to Grade 12 providing a method of instruction that relies primarily on indirect communication between learners and BC certified educators, including internet, other electronic-based delivery, teleconferencing, and correspondence. DL takes place when a student is primarily at a distance from the teacher.

The Ministry of Education funds Independent School Authorities based on the Authorities' reported DL enrolment in September, February and May each year. Independent School Authorities report students undertaking DL programs or courses to the Ministry on [*Form 1701: Student Data Collection Completion Instructions for Independent Schools*](#) (Form 1701).

The Knowledge Management & Accountability Division conducts DL Enrolment audits to verify enrolment reported on Form 1701. The outcomes of these audits could result in funding implications if adjustments are recommended. Funding recoveries are expanded to include full-time equivalents (FTEs) outside the audit sample where the auditors can make a clear link between the audit findings in the sample and those FTEs outside the sample.

Purpose

The purpose of the DL Enrolment audit is to provide assurance to the Ministry of Education and Independent School Authorities that Ministry directives and policies are being followed. The audits are based on *Form 1701: Student Data Collection, Completion Instructions for Independent Schools*, current Distributed Learning requirements and standards as well as related Ministry policies.

Description of the Audit Process

A Distributed Learning audit was undertaken to verify the FTE claims reported by Pathways Academy during the week of May 16, 2015. The total enrolment reported at October 17, 2014 was 213.1875 FTEs, of which 116 student files were reviewed. The review was extended to include all reported students for analysis when the audit team identified school-wide issues.

An entry meeting was held with the Principal and the Distributed Learning Centre's staff 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 program offered by the Distributed Learning Department was provided. The administrators and the audit team discussed the procedures that would be followed to undertake the audit.

As Pathways Academy operates out of various residential satellite locations, the audit team were required to work out of a standard accommodation at a local inn. The auditors sought evidence to determine that the courses claimed met the active criteria by the activation submission date and other related Ministry directives. Throughout the audit there were ongoing discussions with

the staff to ensure the audit team members had an understanding of all aspects of the program. All recommended adjustments were discussed with the staff during the course of the audit, providing them with every opportunity to locate the necessary evidence. The review was extended to include all reported students for analysis when the audit team identified school-wide issues.

An exit meeting was held with the Principal where the audit team presented their preliminary results and clarified any outstanding issues.

Prior to the audit visit, the Lead Auditor undertook a verification of the school-assigned teachers' status with the Teacher Regulation Branch. All of the teachers had a current and valid TRB certificate and none of the teacher certificates indicated restrictions for courses they were eligible to teach.

Description of the Program

Pathways Academy is a small, private Christian Distributed Learning school, serving K-12 students from all across BC. There is no facility for the school, no office or home base, and all of the certified teachers work out of their own homes. The majority of the instructors are from the Prince George/Salmon Arm area but there are others from all over the Province. Parents supervise the students enrolled in the DL program, however, teachers contact the family by phone, Skype, email, online and also make at least one visit per year for a Face-to-Face meeting when practical (depending on the location of the family in conjunction with their teachers, some families will receive regular home visits or group classes). The School is set up in such a way that teachers work with families, and not grades of students, so one teacher is responsible for the majority of the teaching, planning and assessment for each specific family. Other educators are involved if the teacher's area of expertise is not a good match for the senior student's programs.

Observations

The auditors found that:

- All members of the teaching staff of Pathways Academy are currently certified with the Teacher Regulation Branch.
- The teachers lead the educational programs of their students.
- The teachers communicate with students in a variety of ways to support their learning including: Skype, email, telephone, online and face-to-face with home visits.
- The teachers generally evaluate and assess their students on an on-going basis and for all progress reports and interim reports, however, through the review of evidence there were many examples (particularly in Math, Physical Education and most electives) where the students marked and submitted their work to the teacher. There was little evidence that the teacher was evaluating the work (a few instances had indications of reporting done by Skype). The English courses had good demonstrations of assessment and feedback by the teachers, as well as of the work done and submitted.
- The School is in accordance with the [Distributed Learning-Independent Schools](#) and [Distributed Learning-General Policy](#) regarding financial reimbursements to third party providers.
- The School follows the [Distributed Learning-BC Residency Policy](#).

- The School follows the Authority’s policy and procedures for ‘ordinarily’ resident in B.C.
- The School did not follow the [Distributed Learning Active Policy](#) with respect to the date of activation for K-9 claims. Students were activated on registration, however, no adjustments were required, as there was evidence of sufficient work done prior to the claim date, and participation three weeks after. For Grade 10 to 12 students, the teachers must be cognisant of and ensure they only activate students once the minimum 5% substantive student course work is completed. The audit team were able to verify the criteria with few adjustments, as evidence was found to verify the required work was completed prior to the claim date.
- Some student claims for IDS courses did not meet the [requirements for IDS](#) as the School was using this educational option as a “placeholder”. In other instances the IDS claim did not meet the hours required for the number of course credits claimed. It was verified that IDS claims representative of two-credits were reported as four-credit claims. As well, the IDS courses were not always based on the learning outcomes of an elective course and students did not always initiate their own learning.
- There were two students enrolled in Work Experience courses. It was verified that there was no documentation reflecting the compulsory directives for a Ministry Authorized Work Experience (WEX) course including the lack of a student orientation session, no evidence of WorkSafeBC verification and no duly signed WEX agreement. One of the students was verified as being granted course credit based on their past employment and claimed for funding.
- Student permanent record files/learner records were incomplete. Student permanent record files were lacking up-to-date 1704 PR cards. There were very few files with report cards and for the one IEP student file reviewed, the IEP was not included in the file, however, it was available electronically. According to Schedule “A” - Office Of The Inspector Of Independent Schools Distributed Learning, *(1.3.1-page 2) the authority must have student record policy consistent with all applicable legal requirements, including but not limited to the retention of permanent record 1704 form, pertinent medical and legal information, parent and non-graduated adult learner legal residency verification, legal verification of age (birth certificate), two previous report cards, IEP's to support learners when supplementary special-education funding is provided and any other information requested by the province.*
- Many student assignments were not dated or lacked reference to the year. It was difficult to ascertain when the students did the work as activation was done without the context of the day, month and year. There was an inconsistent practice throughout the School of how this information was recorded, or if it was recorded at all.

Audit Sample Findings

The auditors found that:

- 0.5000 Grade 10-12 school-age FTEs had no evidence that the student claims were active at the October activation submission date as required by the DL-Active Policy. In each case there was no evidence of substantive student work on file, and the School was unable to produce evidence upon request.
- 0.1250 non-graduated adult FTE was funded for a course reported in an ineligible claim period. There was no evidence the claim met the active requirement in accordance with the Form 1701 reporting timelines and per directives of DL Active Policy.
- 0.2500 FTEs (0.1250 school-age and 0.1250 non-graduated adults) were reported for Work Experience. There was no verifiable documentation or evidence 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](#). It was verified that one of the students was granted course credit based on their past employment and claimed for funding for an educational session not provided or aligned with Ministry directives. Credit granting does not equate to funding eligibility.

- 0.8750 FTEs (0.7500 school-age and 0.1250 adults) were claimed for Independent Directed Studies (IDS) where the criteria for IDS courses were not met. IDS courses were being used as placeholders for funding claims. These were later changed to a different educational option; students were not directing their own areas of interest; and, the courses were not used to satisfy elective graduation requirements. Additionally, two students were claimed for a four credit IDS course when it was verified the study program's hours of instruction equated to two credits. As well, IDS options are ineligible for students undertaking the Adult Graduation Program.

Recommendations

The auditors recommend that:

- The School report for funding only claims for those students who are active in accordance with the Form 1701 Instructions, and the DL Funding and Active Policies.
- Due to the unique nature of the School (lacking a school facility location or a common meeting place with operations undertaken at the school staff's individual homes), all staff must be made aware of and become conversant with the Form 1701 instructions and all Ministry eligibility requirements associated with the School's various course offerings to ensure future activation claims are eligible.
- Teachers must document the evaluation and assessment of their students on an on-going basis and for all progress reports and interim reports. Assessment is to be done in accordance with **Schedule "A" - Office Of The Inspector Of Independent Schools Distributed Learning**, which states "(2.2.3 page 4) *teachers evaluate and assess learner progress based on their professional assessment and where appropriate input from parents or guardians and the learner is received. Assessment is both of learning and for learning; i.e. assessment is used to describe relative mastery but it is also used as a feedback tool to correct student misunderstandings and diagnose required remediation. It must be frequent and timely with teacher feedback and follow-up.*" And 2.4.1 states (in the role of the parent/guardian) that *SLP's and assessment activities clearly reflect teacher direction.*
- The School implement a process to effectively track student claims from the time of registration until reported, to ensure the claims are eligible for funding in accordance with the Form 1701 Instructions and related DL policies.
- The School staff implement practices to ensure all active requirements are identified by course and dated in accordance with the directives of the DL Active Policy.
- The School staff ensure that student courses are reported in the funding period during which they meet the DL Active criteria and in accordance with the reporting claim directives of the Form 1701 Instructions.
- The School 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. Students participating in paid work experience must still meet all work experience standards and learning outcomes in the WEX program guide.

Further, paid hours being used for WEX may only begin after the school has contacted the employer and a training plan is developed.

- All School staff refrain from loading timetables with educational options other than those that actually represent the student's educational program. The process of utilizing placeholders is an ineligible reporting practice not reflective the Form 1701 reporting instructions. DL Programs report:
 - K-7 student claims according to the DL Active Policy;
 - the student's annual plan of courses for active students in grades 8-9; and
 - all new courses leading to graduation in which the Grade 10-12 student (including adults) has become active within the timeline determined for each specific data collection period.
- IDS course claims must meet all of the [policy requirements](#) and related directives in the [Handbook of Procedures for the Graduation Program](#) (P.59) which enables the students to initiate their own area of learning and must be under the direction of a teacher, each credit is equivalent to 30 hours of instruction, only eligible as an elective option, leads to graduation, has a maximum credit value of four, there is a clear plan that outlines the course which is created with a teacher and a student, and the plan is signed off by the principal. IDS are not eligible for credit in the Adult Graduation Program and all IDS course claims must still meet the DL Active requirements specific the defined learning outcomes not the process to create an IDS learning option.
- School staff ensure that all course claims are reported in accordance with their actual credit value and verified as accurate prior to submitting on Form 1701 for funding.
- School staff ensure all student files contain evidence that demonstrates the student has met all the active requirements before reporting funding claims, including evidence to support the substantive student course activity.
- All student permanent record files/learner records be retained in accordance with Schedule "A" - Office Of The Inspector Of Independent Schools Distributed Learning, (1.3.1-page 2).
- School staff ensure that all student work is consistently dated and that the teacher's evaluation and comments are also dependably dated.
- School staff work to maintain a consistent practice for evaluating, monitoring and dating student work leading to activation, including the determination of where at least five percent of the learning activities reside in each course plan and aligning with the student's substantive course work to that course's learning outcomes. The course plan is required to be the evidence supporting the requirement that assigned work is meeting the learning outcomes.
- The School consider a compliance workshop to aid with any aspects of reporting eligibility that may not be known to the School's staff population.

Auditors' Comments

The auditors wish to express their appreciation to the school staff for their cooperation during the audit.