



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

2014/15 Distributed Learning Enrolment Audit

AUDIT REPORT

**REGENT CHRISTIAN ONLINE ACADEMY
(063 96767)**

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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 conducted at Regent Christian Online Academy during the week of March 16, 2015. The total enrolment reported at October 17, 2014 was 863.2500 FTEs, of which 305 student files were reviewed. The review was extended as a systemic issue was identified where students with special needs classifications were automatically claimed for eight courses (1.0000 FTE).

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 Regent Christian Online Academy was explained. The auditors were initially given training on the OTIS student information system which would be used throughout the audit for all grades and then were later given training on both the MYRCOA and BCOS systems where further information to support Grade 8 to 12 claims could be found.

The audit team worked out of the Regent Christian Online School offices in Victoria. 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 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.

An exit meeting was held with the Principal and School staff 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 teachers were certified for their teaching assignments.

Description of the Program

Regent Christian Online Academy is a K-12 independent school with students primarily from Vancouver Island and the Lower Mainland. While all students are participating in DL programs there are many opportunities for K-7 students to participate in face-to-face classes and K-12 students to participate in additional clubs and experiences. The basic program is tuition free but many opportunities have a user-based fee associated with them. Teachers who reside in many different communities offer the face-to-face classes and fieldtrips to the students in their areas. The School offers a broad B.C. Ministry of Education curriculum as well as many BAA courses specific to the School's community needs and faith.

Regent Christian Online Academy uses three different software programs to offer educational programs, track student progress, record student forms and achievement, and report to parents. Staff, parents and students all have access to these systems.

Observations

The auditors found that:

- All members of the teaching staff of Regent Christian Online Academy are currently certified with the Teacher Regulation Branch. All teachers with restrictions are teaching within their areas.
- The teachers lead the educational programs of their students.
- The teachers communicate with students in a variety of ways to support their learning.
- The teachers evaluate and assess their students on an on-going basis and for all progress reports and interim reports.
- The School is in accordance with the [DL-Independent Schools](#) and [DL-General Policy](#) regarding financial reimbursements to third party providers. The evidence to support the \$600 per student allocation was clear and transparent.
- The School follows the [DL-B.C. Residency Policy](#) and uses the form suggested as "best practice" provided to all independent schools.
- The School follows the District's policy and procedures for 'ordinarily' resident in B.C.
- The School did not follow the [DL Active Policy](#) and the [DL Funding Policy](#) with respect to:
 - Using the appropriate terminology for identifying records (Student Learning Plan, Course

Selection/Registration Form, Course Plan).

- Using the correct terminology for ensuring the student course claim meets the active criteria. The term “Activation Assignment” is being used when the School should be recognizing the active evidence in accordance with the DL-Active Policy directives which is the retained evidence of substantive student course activity representing at least five percent of the student’s course work which is directly linked to the curriculum outcomes required in each course’s learning activities.
- Students were claimed for funding for courses that had no evidence provided.
- Some students were claimed for two or more courses when only one set of substantive student course activity was submitted as verification of the active criteria.
- Students were claimed for course funding that had not met the active criteria.
- Students with special needs classifications were automatically claimed for eight courses (1.0000 FTE) regardless of the number of courses in their education program, and without participation and required course activity for each course claim. According to the School staff, the student information system had been programmed with a 1.0000 FTE default when these students were reported.
- Courses were claimed in two consecutive funding periods. The reclaimed course was verified to be a continuation of learning in the same course.
- A two credit course (Car Maintenance) was claimed as a four credit course.

Audit Sample Findings

The auditors found that:

- All Kindergarten to Grade 9 FTEs claimed on the Form 1701 were active in the program.
- 0.9375 Grade 10-12 school-age FTEs were enrolled in fewer courses than claimed.
- 0.6250 Grade 10-12 school age FTEs had no evidence to verify substantive student course work had been submitted to meet the ‘active’ requirements at the October submission date as required by the DL-Active Policy. The School advised that no evidence was available. Through the review it was verified that in addition to no evidence or without the provision of substantive student work, course descriptions were identical for two reported claims and without evidence of direction or evaluation by a teacher, and as indicated through the student information system undated course work was undertaken after the Fall Data Collection claim date.
- 0.6250 Grade 10-12 school-age FTEs were for the continuation of the student’s learning in the same course from a prior school year. While the submission of the course’s learning outcomes were over a number of reporting periods, it was verified only one course was undertaken and therefore eligible for only one funding claim.
- 0.3750 Grade 10-12 school-age FTEs used the same substantive student activity as evidence to activate more than one course. In accordance with the DL Active Policy “*evidence includes activity demonstrating that a minimum of five percent of each course’s learning activities have been covered*”.
- 2.6250 FTEs (consisting of 2.1250 Grade 10 to 12 school-age and 0.5000 adults) were incorrectly reported for funding due to a computer programming error and did not meet the active participation requirements. The OTIS student information system had been programmed to claim a full FTE (representative of eight 4-credit course claims) for each student with a special needs designation. The team reviewed all student reporting impacted by this default setting to verify the eligibility of each claim.

- 0.1250 Grade 10-12 school-age FTEs were adjusted to reflect actual two-credit courses claimed as four-credit courses.

Recommendations

The auditors recommend that:

- The School recognise and identify their evidence documents to align correctly with the DL policies, agreement and standards. Specifically: Student Learning Plan, Course Selection/Registration Form, Course Plan and substantive student course activity be clearly titled, categorized, signed and dated as required.
- The School report for funding only claims for those students who are active in accordance with the DL Active policy and in accordance with Form 1701 reporting instructions.
- The 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.
- The School staff ensure that all courses meet the definition of course with clear connections to the learning outcomes for each individual course and that the substantive student course activity is clearly linked to the learning outcomes for each unique course.
- 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 and aligned with Form 1701 reporting timelines.
- The School staff ensure that all student claims including students with Special Needs classifications are verified and claimed only for those courses that meet active participation in distributed learning as identified in all related DL requirements, in the appropriate funding claim period.
- The School's tracking system must be immediately reconfigured to ensure there are no defaults enabling ineligible claims.
- The School staff ensure that student courses are claimed for the funding period during which they meet the DL Active Policy criteria and in accordance with the reporting claim directives of the Form 1701 Instructions. In instances where the timelines are not followed, there must be documentation to verify the course was not previously claimed along with an explanation of why Form 1701 directives were not followed.
- The School staff ensure the on-going learning in a course is reported for funding once regardless of the number of reporting periods the student takes to complete the outcomes.
- Adult students only be claimed for funding when the requirements as outlined in the DL Active Policy are met.

Auditors' Comments

The auditors wish to express their appreciation to the school staff for their assistance, cooperation and hospitality during the audit.